

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)	Corresponding Permit Section											
	A.1.b.4.a: Overall Planning											
	A.1.b.4.b					A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT	Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
					Local MS4 Dept	SIE, Regional Organization or Co-permittee						
E. PROVISIONS FOR ALL TRADITIONAL SMALL MS4 PERMITTEES												
E.1. RENEWAL TRADITIONAL SMALL MS4 PERMITTEES												
E.2. NEW TRADITIONAL SMALL MS4 PERMITTEES												
E.3. NON-TRADITIONAL SMALL MS4S PERMITTEES												
E.4. SMALL MS4 ASBS PERMITTEES												
	E.4 (C: I.A)	Point & Non-Point Source Discharges - Discharges composed of storm water runoff shall not alter natural ocean water quality in an ASBS.	Within 6 years all dischargers must comply with the requirement that their discharges into the affected ASBS maintain natural ocean water quality.	Compliance by 2018	5	Resource Management Agency - Division of Public Works (RMA-DPW)	x	No	x	x	x	x
	E.4 (C: I.A.1.c)	The discharge of trash is prohibited.		Compliance by 2018	5	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.1.d)	Only discharges from existing storm water outfalls are allowed.	Any proposed or new storm water runoff discharge shall be routed to existing storm water discharge outfalls and shall not result in any new contribution of waste to an ASBS (i.e., no additional pollutant loading). "Existing storm water outfalls" are those that were constructed or under construction prior to January 1, 2005. "New contribution of waste" is defined as any addition of waste beyond what would have occurred as of January 1, 2005. A change to an existing storm water outfall, in terms of re-location or alteration, in order to comply with these special conditions, is allowed and does not constitute a new discharge.	2014	1	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.2.)	Point Source Compliance Plan	Discharger shall specifically address the prohibition of non-storm water runoff and the requirement to maintain natural water quality for storm water discharges to an ASBS in an ASBS Compliance Plan to be included in its SWMP or a SWPPP, as appropriate to permit type. If a statewide permit includes a SWMP, then the discharger shall prepare a stand-alone compliance plan for ASBS discharges. Draft written ASBS Compliance Plan written to the State Water Board Executive Director 18 months after effective date of exception; Final compliance plan, based on results of runoff and receiving water monitoring is submitted within 30 months from the effective date of the exception.	2015	2	RMA-DPW	x	No	x	x	x	Compliance Plan deadline should be tied to ASBS RMP.
	E.4 (C: I.A.2.a)	Compliance Plan Components - Map of drainage area	Prepare concurrent with updates to existing outfall maps - include (a) The surface drainage area of storm water runoff with sheet runoff, prioritize discharges and describe any structural BMPs currently in place or planned. (b) Storm water conveyance system including pipes, culverts, open channels and bridges, outfalls. (c) Should identify the location of treatment facilities, landslides potential, areas prone to erosion, and waste and hazardous materials location. (d) Include procedure for updating map	2015	2	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.2.a/b)	Compliance Plan Components - Describe measures to eliminate non-authorized, non-storm water runoff discharges (dry weather flows); how to maintain measures over time, and how measures should be monitored	This may include an inventory and characterization of dry weather flows that could also be include in the map.	2015	2	RMA-DPW	x	No	x	x	x	x

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	E.4 (C: I.A.2.c)	Compliance Plan Components - Construction, Business and Industrial Facility Inspections	Minimum Frequency: Construction site: once per week during rainy season; Industrial facility: monthly during rainy season; Commercial facilities: twice during rainy season; Storm water outfall drains greater than 18 inches in diameter inspected once before and once during rainy season and maintained to remove trash and other debris	2014	1	RMA-DPW, RMA-Building Services Division (RMA-BSD)	x	No	x	x	x	x
	E.4 (C: I.A.2.d)	Compliance Plan Components - Address wet weather flows and pollution reduction strategy through BMPs	Structural controls that are necessary for compliance will be operational within 6 years of the effective date of the Exception. Structural BMPs need not be installed if the discharger can document to the satisfaction of the State Water Board Executive Director (statewide permits) or Regional Water Board Executive Officer (Regional Water Board permits) that such installation would pose a threat to health or safety	2018	5	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.2.d)	Compliance Plan Components - BMPs to achieve: Table B Instantaneous Maximum Water Quality Objectives in Chapter II of the Ocean Plan; or a 90% reduction in pollutant loading during storm events	Baseline = effective date of the Exception	Baseline data year 2012	0	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.2.e)	Compliance Plan Components - Erosion control and sedimentation prevention plan	Natural habitat conditions will not be altered due to anthropogenic sedimentation	n/a	n/a	RMA-DPW, RMA-BSD	x	No	x	x	x	x
	E.4 (C: I.A.2.f)	Compliance Plan Components - Describe non-structural BMPs including education and outreach efforts. Include structural BMPs and LID measures and implementation schedule	Non-structural controls that are necessary for compliance will be implemented within 18 months of the effective date of the Exception. Applicants must consider and use where feasible LID practices to reduce pollutants from entering the ASBS.	2013	1	RMA-DPW	x	No	x	x	x	x
	E.4 (C: I.A.3)	Demonstrate BMPs to reduce flows or reduce pollutant loading – if results of monitoring indicate an alteration of natural water quality in the ASBS, a report will be submitted to the State Water Board including: constituents and sources of constituents altering storm water; describe BMPs currently in use; new or modified implementation schedule for BMPs	If the initial results of post-storm receiving water quality testing indicate levels higher than the 85th percentile threshold of reference water quality data and the pre-storm receiving water levels, then the discharger must re-sample the receiving water, pre- and post-storm. If after re-sampling the post-storm levels are still higher than the 85th percentile threshold of reference water quality data, and the pre-storm receiving water levels, for any constituent, then natural ocean water quality is exceeded. If the results of the receiving water monitoring indicate that the storm water runoff or other nonpoint source pollution is causing or contributing to an alteration of natural ocean water quality in the ASBS, the discharger shall submit a report to the State Water Board and Regional Water Board within 30 days.	2018	5	RMA-DPW	x	No	x	x	x	x
	E.4 (C: II)	Additional Requirements for Parks and Recreation Facilities - ASBS Compliance Plan or an ASBS Pollution Prevention Plan to address storm water runoff from parks and recreation facilities	Pollutant sources include, but are not limited to, roadside rest areas and vistas, picnic areas, campgrounds, trash receptacles, maintenance facilities, park personnel housing, portable toilets, leach fields, fuel tanks, roads, piers, and boat launch facilities. Include signage at camping, picnicking, beach and roadside parking areas, and visitor centers, or other appropriate measures, which notify the public of any applicable requirements of these Special Protections and identify the ASBS boundaries	2018	5	Local (Not Applicable)	x	No	x	x	x	x
	E.4 (C: III)	Additional Requirements for Parks and Recreation Facilities - Waterfront and Marine Operations Management Plan (Waterfront Plan)	Contain appropriate Management Measures/Practices to address nonpoint source pollutant discharges to the affected ASBS.	2018	5	Local (Not Applicable)	x		x	x	x	x
	E.4 (C: IV)	Monitoring Requirements - Monitoring is mandatory for all dischargers to assure compliance with the Ocean Plan. Monitoring requirements include both: (A) core discharge monitoring, and (B) ocean receiving water monitoring	Central Coast ASBS RMP approved December 2012. To be implemented 13/14 and 14/15 wet seasons. State and Regional Water Boards must approve sampling site locations and any adjustments to the monitoring programs. All ocean receiving water and reference area monitoring must be comparable with the Water Boards' Surface Water Ambient Monitoring Program (SWAMP).	2015	3	Regional (ASBS RMP)	x	No	x	x	x	x

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E.5 SEPARATE IMPLEMENTING ENTITY													
Admin	E.5	SIE	Entities can develop a SIE to implement and manage all or various aspects of the Phase II Permit.	2014	1	RMA-DPW	Monterey Regional Storm Water Management Program (MRSWMP)	MOA or letter of Agreement required	Equivalent	x	x	x	Equivalent structure that is administrative in function
E.6 PROGRAM MANAGEMENT ELEMENT													
3-4.a	E.6.a.i	Review and Revise Local Ordinances	By year 2 Permittee to review and revise local ordinances to effectuate enforcement capability of control of pollutant discharges	2015	2	RMA-Planning Division (RMA-PD), County Counsel		x	no	x	Enhance existing Ordinances	x	The elements of the new permit are more restrictive and protective of local water quality, i.e. the new post construction requirements.
3-4.b 3-4.c 3-5.a	E.6.a.ii	Authority to:	a. Prohibit non-stormwater discharges; b. Detect and eliminate illicit discharges and illegal connections. C. respond to discharges of spills. D. require parties to address excess "incidental runoff" per Discharge Prohibition B.4. (a-e). f. Construction sites to employ BMPs. g. require information to assess compliance, h. enter private property, i. require dischargers cease and desist and cleanup (72 hours - high risk spills, 30 days uncontrolled pollutants, Permittee to clean up and abate spill and bill responsible party, cease and desist authority) notification to RWQCB in 5 days when cleanup can not be completed within time frame set. j. ability to levy fines, cost recovery mechanism. k. impose civil or criminal sanctions when warranted.	2015	2	Board of Supervisors, County Counsel, Environmental Health Bureau (EHB), RMA-BSD, RMA-PD, RMA-DPW		x	no	x	Cease	x	New permit is more prescriptive in nature and requires more collaboration amongst entities, thus leading to better protection of local water quality.
none	E.6.b	Legally Responsible Person to Certify Program	Legally Responsible Person (Duly Authorized Representative / Principal Executive Officer) to certify that permittee has and will maintain full legal authority to implement and enforce each of the requirements contained in this Order.	2014	1	RMA-DPW		x	no	x	Cease	x	It is assumed that requiring a City Leader to be the signatory authority for the program will lead to enhanced program awareness which should lead to greater involvement in the program.
none	E.6.b.i	Authorized rep to certify	Authorized rep to certify in annual report that agency has the legal authority to comply with the Permit	2014	2	RMA-DPW		x	no	x	Cease	x	The prescriptive nature of the new permit lends itself to being more protective of water quality.
none	E.6.b.ii	Implementation Level	Certification statement shall include: (a) Identification of all departments that conduct storm water-related activities and their roles and responsibilities. (b) Citation of storm water runoff related ordinances, identification of the topics each ordinance addresses; (c) Identification of the local administrative and legal procedures and ordinances available to mandate compliance. (d) A description of how storm water related-ordinances are reviewed and implemented. (e) A statement that the municipality will implement enforcement actions consistent with its Enforcement Response Plan developed pursuant to Section E.6.c.	2014	2	RMA-DPW		x	no	x	x	x	The prescriptive nature of the new permit lends itself to being more protective of water quality.
none	E.6.b.iii	Implementation Level	Reporting – Submit in first year, a statement signed certifying the Permittee has adequate legal authority to comply with all Order requirements.	2014	1	RMA-DPW		x	no	x	Cease	x	Having buy-in from decision making personnel and personal accountability should lead to the implementation of BMPs that will be more protective of local water quality.
none	E.6.c.i. ii, (a,b,c)	Develop & Implement ERP	By year 3 Permittee shall develop and implement an Enforcement Response Plan to include:	2016	3	RMA-BSD-Code Enforcement		x	no	x	Cease	x	Although the existing approach is successful, it may be beneficial to transition over to new permit to create regional consistency and uniformity.
none	E.6.c.ii.d.1	Determine & Refer non-filers	When discovered "report" all non-filers of facilities requiring a CGP and / or IGP to the State Water Board	2016	3	RMA-DPW		x	no	x	x	x	No equivalent BMP exist, thus this BMP will be an improvement in the area of local water quality protection.
none	E.6.c.ii.d.2	Determine & Refer non-filers	Report recalcitrant violators of CGP and / or IGP to the State Water Board	2016	3	RMA-DPW		x	no	x	x	x	No equivalent BMP exist, thus this BMP will be an improvement in the area of local water quality protection.

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none	E.6.c.ii.e	Tracking System	Track and monitor recalcitrant violators	2016	3	RMA-BSD, RMA-DPW		x	no	x	x	No equivalent BMP exist, thus this BMP will be an improvement in the area of local water quality protection.	
none	E.6.c.ii.f	Enforcement Response Plan	This would coincide with the Enforcement Response Plan to include reporting chronic violators to reduce the rate of recidivism.	2016	3	RMA-BSD- Code Enforcement, RMA-DPW		x	no	x	Cease	Since the new requirement is similar to the existing it is proposed that the existing requirement be discontinued and that the Group transition over to the new permit format for regional consistency purposes.	
throughout	E.6.c.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	2016	3	RMA-DPW		x	no	x	Cease	The new permit requires the implementation of the Effectiveness Assessment Improvement Plan element which will ensure that local water quality will be protected to the maximum extent practical by employing the latest and greatest technologies and approaches	
E.7 EDUCATION AND OUTREACH PROGRAM													
E.7.a Public Outreach and Education													
none	E.7.	Community Based Social Marketing	RWQCB to notify permittee within 3 months of permit adoption date if CBSM will be required.	2014	1	Regional Water Quality Control Board		x	Similar	x	Expand	The implementation of a CBSM will be an expansion of current program requirements, thus leading to enhanced water quality protection.	
1-1.a	E.7.a	Program Development / Implementation	Determine, develop and implement program structure.	2014	1	Regional (MRSWMP)		x	Similar	x	Expand	The implementation of a CBSM will be an expansion of current program requirements, thus leading to enhanced water quality protection.	
1-1.a	E.7.a	Reporting Requirements to Maintain	Report on which approach to PE / PO program Permittee will do. If collaborative, include copy of signed agreement in Annual Report	2014	1	Regional (MRSWMP)		x	no	x	no equivalent	Documenting which approach Permittees will employ will likely lead to more ownership, thus increased water quality protection.	
1-1.a	E.7.a.i	Program Development / Implementation	Develop and implement a comprehensive PE / PO program to measurably increase the knowledge and awareness of the target audience.	2015	2	Regional (MRSWMP)		x	no	x	Expand	Most, if not all of the existing BMP task are covered in the very prescriptive new permit, thus most will just be assimilated into the new program requirements.	
1-1.a	E.7.a.ii.a	Program Development / Implementation	PE / PO Program to include: task schedule, who handles what, how the BMP's address specific water quality issues, target audiences in the community (i.e. POC) and anticipated task effectiveness.	2015	2	Regional (MRSWMP)		x	no	x	Cease	The more prescriptive nature of the new permit will foster more program ownership since it will identify who handles which task, thus leading to better protection of local water quality.	
1-1.a	E.7.a.ii.b	Program Development / Implementation	At least 2 surveys during permit term to gauge awareness and effectiveness of PE / PO tasks	2 times	2x	Regional (MRSWMP)		x	no	x	Cease	Since the new requirement is similar to the existing it is proposed that the existing requirement be discontinued and that the Group transition over to the new permit format for regional consistency purposes.	
2-1.a - 2-3.a	E.7.a.ii.c	Focused PE / PO	PE / PO Message to focus on: 1. Local POC, 2. Target audience, 3. Regional WQ issues	2015	2	Regional (MRSWMP)		x	no	x	Cease	Since the new requirement is similar to the existing it is proposed that the existing requirement be discontinued and that the Group transition over to the new permit format for regional consistency purposes.	
2-1.a - 2-3.a	E.7.a.ii.d	TV, Radio, Print	PE / PO Message to be multi-pronged (Print, air, storm drain stenciling) and in applicable languages.	2015	2	Regional (MRSWMP)		x	no	x	Cease	Since the new requirement is similar to the existing it is proposed that the existing requirement be discontinued and that the Group transition over to the new permit format for regional consistency purposes.	

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2-1.a - 2-3.a	E.7.a.ii.e	Public Involvement & Participation Program	Public input must be utilized when developing the PE / PO Program.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The existing permit required some public involvement, but not to the detail specified within the new permit. Thus it is likely that the new permit's approach will create greater community buy in, thus leading to greater water quality protection.	
1-1.a, 2-1.a - 2-3.a	E.7.a.ii.f	Program Development / Implementation	PE / PO Message to be multi-pronged based upon public input phase.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The existing permit required some public involvement, but not to the detail specified within the new permit. Thus it is likely that the new permit's approach will create greater community buy in, thus leading to greater water quality protection.	
none	E.7.a.ii.g	Program Development / Implementation	PE / PO Messaging to include benefits of water-efficient and stormwater friendly landscaping.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.	
3-1.a 3-1.b 2-1.a - 2-3.a	E.7.a.ii.h	Program Development / Implementation	PE / PO Messaging to include how to report Illicit discharges, spills, to authorities through a central contact. If 911 is selected then a list of non-emergency contacts must be developed and voice mail must be checked daily	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	Since the new requirement is similar to the existing it is proposed that the existing requirement be discontinued and that the Group transition over to the new permit format for regional consistency purposes.	
1-1.a & 1-1.b,	E.7.a.ii.j	Schools & Experiential Learning	Permittee shall implement environmental place-based learning or equivalent in local schools (public & private).	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The proposed methodology for school based training has proven to be very successful in other areas (i.e. Sacramento), thus it is likely that it will foster greater interest amongst the youth in water quality protection.	
3-6.a	E.7.a.ii.k	Pressure Washing, Car Washing, Irrigation Practices	PE PO messages to include specifics on reducing discharges from organized car washes, mobile & pressure washing cleaning activities and landscape irrigation.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.	
3-6.a	E.7.a.ii.l	Pressure Washing, Car Washing, Irrigation Practices	PE PO regarding organized car washes to follow Sacramento SW Quality Partnership's River Friendly Carwash Program.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.	
3-6.a	E.7.a.ii.m	Pressure Washing, Car Washing, Irrigation Practices	PE PO specific messages pertaining to mobile cleaning and pressure wash businesses.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.	
throughout	E.7.a.iii	General	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	2014	1	Regional (MRSWMP)	x	no	x	Cease	x	The new permit requires the implementation of the Effectiveness Assessment Improvement Plan element which will ensure that local water quality will be protected to the maximum extent practical by employing the latest and greatest technologies and approaches	
	E.7.b	Staff & Site Operator Training / Edu.											
3-3.a, 4-2.a, 4-3.a, 4-4.b	E.7.b.1.i	Staff & Site Operator Training / Edu.	Training Program - all permittee staff who, as part of their normal job responsibilities, may be notified of, come into contact with, or otherwise observe an illicit discharge or illegal connection to the storm drain system.	2016	3	EHB, RMA-BSD, RMA-DPW, Water Resources Agency (MCWRA) Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.	

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					Local MS4 Dept	SIE, Regional Organization or, Co-permittee							
3-3.a, 4-2.a, 4-3.a, 4-4.b	E.7.b.1.ii	Staff & Site Operator Training / Edu.	Training Program to include: a. Identifying Illicit Discharges (ID) & Illicit Connections (IC); b. proper ID & IC reporting and response criteria, c. follow-up training as needed, d. annual assessment of staff knowledge, e. training of new hires who jobs necessitate ID & IC training, f. fleet vehicles to include how to guide on ID & IC., g. focused training on identified ID & IC locations	2016	3	EHB, RMA-DPW	Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive, thus it will likely lead to greater protection of local water quality.
	E.7.b.1.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	2016	3	EHB, RMA-BSD, RMA-DPW, MCWRA	Regional (MRSWMP)	x	no	x	Cease	x	The implementation of the EAIP approach will create opportunities for program modifications to increase water quality protection.
E.7.b.2 Construction Outreach & Education													
3-3.a, 4-2.a, 4-3.a, 4-4.b	E.7.b.2.a.i	Implementation Level	Ensure that all staff implementing the construction site SW runoff control program are adequately trained.	2015	2	RMA- BSD, RMA-DPW, MCWRA		x	No	x	Cease	x	The new permit's training requirements are more prescriptive, thus ideally leading to staff with more skills, knowledge and abilities, thus leading to consistency in program implementation and greater water quality protection.
	E.7.b.2.a.ii	Certifications	Staff to be trained: Plan reviewers and permitting staff (QSD or supervised by QSD), Erosion Sediment Control Inspectors (QSD or QSP or supervised by same) or Third party plan reviewers are QSD.	2015	2	RMA-BSD, RMA-DPW, MCWRA		x	No	x	Cease	x	The new permit's training requirements are more prescriptive, thus ideally leading to staff with more skills, knowledge and abilities, thus leading to consistency in program implementation and greater water quality protection.
throughout	E.7.b.2.a.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	2015	2	RMA-DPW	Regional (MRSWMP)	x	No	x	Cease	x	The implementation of the EAIP approach will create opportunities for program modifications to increase water quality protection.
4-4.b	E.7.b.2.b.i	Informational Materials	Develop and distribute educational materials to construction site operators.	2016	3	RMA-BSD, RMA-DPW	Regional (MRSWMP)	x	no	x	Cease	x	The new permits educational and outreach requirements are much more prescriptive and require community involvement in the development of the program and related materials, thus likely creating more buy-in. Coupled with the use of the EA IP the end result should be enhanced water quality protection.
	E.7.b.2.b.ii	Informational Materials	(a) Each year, provide information on training opportunities for construction operators on BMP selection, installation, implementation, and maintenance as well as overall program compliance. (b) Develop or utilize existing outreach tools (i.e. brochures, posters, etc.). (c) Distribute to all construction operators disturbing land within the MS4 boundary. The Permittee's contact information and website shall be included in these materials. (d) Update existing storm water website, as necessary, to include information on appropriate selection, installation, implementation, and maintenance of BMPs.	All	All		Regional (MRSWMP)	x	no	x	Cease	x	Providing additional information sources to contractors outside of just two training events should provide more opportunities for them to develop the necessary skills, knowledge and abilities to adequately protect local water quality. The new permit is more prescriptive, thus lending itself to more program consistency regionally which should lead to more effective water quality protection.
throughout	E.7.b.2.b.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	All	All		Regional (MRSWMP)	x	no	x	Cease	x	The implementation of the EAIP approach will create opportunities for program modifications to increase water quality protection.
E.7.b.3 Pollution Prevention													

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)		Corresponding Permit Section											
		A.1.b.4.a: Overall Planning											
		A.1.b.4.b					A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT	Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))	
					Local MS4 Dept	SIE, Regional Organization or, Co-permittee							
3-3.a, 4-3.a, 6-1.a, 6-4.a, 6-7.g, 6-8.a	E.7.b.3.i	Program Development / Implementation	Biennial training, evaluation of employees P3 alternate years, train new hires whose jobs will involve P3 / GH practices within 1 year of hire date.	2015	2	RMA, RMA-DPW	Regional (MRSWMP)	x	no	x	Cease	x	The new permit requirements are more prescriptive and enhanced, thus likely resulting in greater staff knowledge and abilities which should equate to greater water quality protection.
	E.7.b.3.i	Skills Knowledge and Abilities Assessment	Determine staffs knowledge annually	2015	2	RMA, RMA-DPW	Regional (MRSWMP)	x	no	x	Cease	x	Annual staff knowledge assessments should lead to increased knowledge, skills and abilities resulting in greater water quality protection.
	E.7.b.3.ii	Skills Knowledge and Abilities Assessment	Municipal Operations (MO) Good Housekeeping (GH) training shall include: a biennial training to include clear guidance on BMPs to employ / use; general SW education, new technologies, operations or responsibilities that evolve and permit requirements that apply to staff being trained. (b) Annual assessment of trained staff's knowledge of P2 & GH and implement EA IP if necessary, (c) Hired contractors must to perform O&M activities shall be contractually required to comply with all of the storm water BMPs, good housekeeping practices, and standard operating procedures described above. (d) The Permittee shall provide oversight of contractor activities.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The new permit requirements are more prescriptive and enhanced, thus likely resulting in greater staff knowledge and abilities which should equate to greater water quality protection. Also, the annual staff knowledge assessments should lead to increased knowledge, skills and abilities resulting in greater water quality protection.
	E.7.b.3.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	All	All		Regional (MRSWMP)	x	no	x	Cease	x	The implementation of the EAIP approach will create opportunities for program modifications to increase water quality protection.
E.8 PUBLIC INVOLVEMENT AND PARTICIPATION PROGRAM													
Public Involvement & Participation Program													
2-1.a, 2-3.a	E.8.i	Public Involvement & Participation Program	Involve public in program development & implementation; encourage volunteerism, public comment and input on policy, and activism.	2015	2		Regional (MRSWMP)	x	No	x	Cease	x	The proposed permit will create more buy-in by the public which should lead to a more successful program.
	E.8.i	IRWMP	Agency to be involved in IRWMP or equivalent watershed level planning effort	2015	2		Regional (MRSWMP)	x	Equivalent	x	Equivalent standard in place	x	Since the group already is involved in the IRWMP, the switch over to the new permit for regional consistency should not result in a reduction in water quality protection.
	E.8.ii	Program Development / Implementation	Program Element To: (a) PP & PI program establishes who is responsible for specific tasks and goals. (b) Consider development of a citizen advisory group. (c) Create opportunities for citizens to participate in the implementation of BMPs through sponsoring activities, (d) Ensure the public can easily find information about the Permittee's storm water program. and (e) Actively engage in the agency's IRWMP or equivalent watershed level planning effort.	2015	2		Regional (MRSWMP)	x	No	x	Cease	x	The proposed permit will create more buy-in not only by staff, but by the public which should lead to a more successful program.
	E.8.iii	Program Effectiveness Assessment and Improvement Plan (EA IP)	Submit summary of last years activities to include a summary to address the relationship between these activities and the EA IP.	All	All		Regional (MRSWMP)	x	No	x	Cease	x	The implementation of the EAIP approach will create opportunities for program modifications to increase water quality protection.
E.9 ILLICIT DISCHARGE DETECTION AND ELIMINATION													
3-2.a	E.9.a	Outfall Mapping - Create and maintain accurate outfall map including a site visit to each outfall	Implementation includes combining land use maps with outfall maps, and identifying priority areas.	2015	2	RMA-DPW		x	No		Cease	x	Outfall mapping completed for MRSWMP and not required for renewal permittees. However, maps should be updated in Year 2 to incorporate additional information.
	E.9.b	Illicit Discharge Source/Facility Inventory											

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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Element	PERMIT SECTION AND ELEMENT	Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))	
					Local MS4 Dept	SIE, Regional Organization or, Co-permittee							
3-3.b	E.9.b	Create inventory of all industrial/commercial facilities and update annually	Implementation requires additional information about each facility than existing documentation in MRSWMP, and expands types of facilities to be included in the inventory.	2015	2	RMA-DPW		x	No	3-3.b. Using the "Inventory of businesses to be inspected" and the "Business inspection checklists contained in Appendix E, prioritize the businesses to be inspected, and perform compliance inspections on these businesses to identify illicit connections and illegal discharges and take action to correct any observed violations of the storm water ordinance. Discharges to Environmentally Sensitive Areas, discharges to Areas of Special Biological Significance, restaurants/fast food chains, auto repair shops, and gas stations will receive top prioritization in scheduling these inspections.	Cease	x	Recommend updating inventory in Year 2 per new permit
3-5.a	E.9.b			2015	2	EHB		x	Yes	3-5.a. Using the "Inventory of campgrounds, RV parks and boat marinas" and the Business inspection checklists for these facilities contained in Appendix E, inspect each RV park, campground, and boat marina annually, and take action to correct any observed violations of the discharge ordinance	Cease	No demonstrable water quality improvement from business inspections once per permit cycle	Discuss with Regional Board; few such facilities within MRSWMP permittees, not a type of facility required under new permit.
3-3.a 3-3.b	E.9.b		Business inspections not required except for ASBS dischargers	2015	2	EHB, RMA-DPW		x	Yes	3-3.a., 3-3.b. Using the training materials contained on pages F-2 through F-7 of Appendix F, train inspection personnel and other municipal staff, and obtain resources necessary to inspect businesses.	Cease for non-ASBS permittees	No demonstrable water quality improvement from business inspections once per permit cycle	x
3-3.c	E.9.b			2015	2	Regional (MRSWMP)		x	Yes	3-3.c. Create hotline for public reporting of illicit connections	Maintain	x	x
2-2.e		Assess priority areas once during Permit term		2017	4	EHB, RMA-DPW		x	Yes	2-2.e. Within the MRSWMP area, the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body	Maintain	x	See comment under monitoring
	E.9.c	Field Sampling to Detect Illicit Discharges											
	E.9.c	Sample ANY flowing outfalls while conducting E.9.a		2015 (Summer 2014)	2	RMA-DPW		x	yes		Cease	Task complete	x
2-2.d	E.9.c	Annually sample PRIORITY area outfalls determined in E.9.a.		Summer 2015	3	Regional (MRSWMP)		x	no	2-2.d. Based on existing scientific studies and data, the MRSWMP Group will implement a pollution reduction component that identifies with specificity the geographic areas within the jurisdiction of each municipality that are sources of pollution, including T. Gondii and other pathogens, impacting California sea otters. Once the geographic areas are identified the MRSWMP group will create and implement a program to reduce and eliminate the sources of pollution identified as impacting sea otters.	Cease	ASBS monitoring studies to be implemented for majority of MRSWMP monitored outfalls, will provide more extensive data	Study complete.
3-3.e	E.9.c					RMA-DPW		x	No	3-3.e. Perform source tracking of manholes in the "Designated Hot Spot areas" listed in Appendix E to determine source of pollutants	Reduce	Revise based on PRIORITY outfalls	Limited outcomes in identifying source of pollutants through this BMP

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)		Corresponding Permit Section										
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	E.9.c	Conduct follow up investigation within 72 hours if action levels exceeded	2015 (Summer 2014)	2	EHB, RMA-DPW		x	No	x	x	x	NEW - partially implemented by PG and Monterey through Urban Watch programs
	E.9.d	Illicit Discharge Detection and Elimination Source Investigations and Corrective Actions										
3-1.c	E.9.d	Develop written procedures for investigations and corrective actions	2015 (Summer 2014)	2	EHB, RMA-BSD - Code Enforcement, RMA-DPW		x	yes	3-1.c. Using the "Protocol for responding to reports of illegal discharges and illicit connections" and the "Protocol for taking action against violators" contained in Appendix E and the enforcement provisions of the appropriate MS4 storm water ordinance, investigate and take appropriate action on each report of illicit discharge that is received.	Maintain	Update if appropriate	x
	E.9.d	Once source of discharge is identified, require responsible party to correct within 72 hours of notification and verify with follow-up investigation	2015 (Summer 2014)	2	EHB, RMA-DPW		x	yes	x	Maintain	Update if appropriate	NEW - but also partially provided for in existing stormwater ordinances
	E.9.d	Conduct follow up investigation within 72 hours if action levels exceeded	2015 (Summer 2014)	2	EHB, RMA-DPW		x	yes	x	Maintain	Update if appropriate	NEW
3-1.a 3-1.b	E.9.d		2015 (Summer 2014)	2		Regional (MRSWMP)	x	yes	3-1.a., 3-1.b: Create and maintain a unified place for public to call to report potential illicit discharges	Maintain	x	x
3-4.a	E.9.d		2015 (Summer 2014)	2	Board of Supervisors, County Counsel, EHB, RMA, BSD-Code Enforcement		x	Yes	3-4.a. Using the guidance document pertaining to illicit connections and illegal discharges and model stormwater ordinance in Appendix E, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.	Maintain	Update if appropriate	
	E.9.e	Spill Response Plan	Develop plan	2014	1	EHB, RMA-BSD-Code Enforcement	x	No	x	x	x	NEW
E.10 CONSTRUCTION SITE STORM WATER RUNOFF CONTROL PROGRAM												
	E.10.a	Construction Site Inventory										
	E.10.a.i	Task Description	By year 1 the permittee shall maintain an inventory of all projects subject to local stormwater ordinance	2014	1	RMA-BSD	x	no	x	x	x	Inventory requirements under the new permit are much more detailed than the existing system. Thus, this should result in better protection of local water quality.
	E.10.a.ii	Implementation Level	The inventory shall contain, at a minimum: a. contact information for each project b.basic site information c. location of project with respect to all waterbodies d. project threat to water quality e. current construction phase f. required inspection frequency per local storm water ordinance g. project start and anticipated completion dates h. date the permittee approved the erosion and sediment control plan	2014	1	RMA-BSD	x	no	x	x	x	The new permit requires much more detailed information with respect to each construction site, including the site's threat to water quality, and data for sites covered by the CGP. Thus, this should result in better protection of local water quality.
	E.10.a.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2014	1	RMA-BSD, RMA-DPW	x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to buy-in of the new permit requirements. This should result in better protection of local water quality.
	E.10.b	Construction Plan Review and Approval Procedures										

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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Element	PERMIT SECTION AND ELEMENT		Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
						Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
4-2.b	E.10.b.i	Task Description	By year 1 the Permittee shall develop procedures to review and approve relevant construction plan documents.	2014	1	RMA-BSD, MCWRA		x	no	x	x	x	The new permit requires much more detailed information with respect to each construction site's ESC plan, including relevant permits. Thus, this should result in better protection of local water quality.
	E.10.b.ii	Implementation Level	The review procedures shall meet the following: a. Prior to issuing a permit the Permittee shall require each operator of a construction site to prepare and submit an erosion and sediment control plan with site-specific BMPs that meet minimum requirements of local storm water ordinance b. Require that Erosion & Sediment Control (ESC) plan include rationale for selected BMPs including soil loss calculations c. Require that ESC plan list applicable permits directly associated with grading activity and evidence that these permits have been obtained prior to commencing the soil disturbing activities authorized by the grading permit d. Conduct and document review of each ESC plan using a checklist or similar process e. A SWPPP developed pursuant to the CGP may substitute for the ESC plan, but Permittee is responsible for reviewing applicable portions of the SWPPP for compliance with local storm water ordinance.	2014	1	RMA-BSD, RMA-DPW, MCWRA		x	no	x	x	x	The new permit requires site specific BMPs and their rationale for use, including soil loss calculations, which should result in better site erosion and sediment control. Sites covered by the CGP must also be reviewed. Taken together, this should result in better protection of local water quality.
	E.10.b.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2014	1	RMA-BSD, MCWRA		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to buy-in of the new permit requirements. This should result in better protection of local water quality.
E.10.c Construction Site Inspection and Enforcement													
4-3.b	E.10.c.i	Task Description	By year 2 the Permittee shall use legal authority to implement procedures for inspecting public and private construction projects and conducting enforcement if necessary.	2015	2	RMA-BSD		x	no	x	x	x	Increased legal authority to perform inspections and enforcement should result in better protection of local water quality.
	E.10.c.ii	Implementation Level	Permittee shall conduct, at minimum, inspections at priority construction sites prior to land disturbance (during the rainy season), during and after active construction. Inspections shall include assessment of compliance with storm water ordinance. 1. pre-construction E&S BMP inspection; 2. active construction inspection; 3. post-construction inspection Inspect 100% of applicable construction sites in accordance with project priority: High: weekly during rainy season; Medium: at least twice during rainy season; Low: at least once during rainy season. Prioritization criteria shall be based on project threat to water quality. At conclusion of the project, Permittee must inspect site to ensure that all disturbed areas have been stabilized and temporary ESC measures are no longer needed.	2015	2	RMA-BSD		x	no	x	x	x	The new permit determines prioritization of construction sites by project threat to water quality, a corresponding schedule for inspection, and a more detailed list of items to inspect, thus leading to better protection of local water quality
4-4.a	E.10.c.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2015	2	RMA-BSD, MCWRA		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to buy-in of the new permit requirements. This should result in better protection of local water quality.
E.11 POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR PERMITTEE													
E.11.a Inventory of Permittee-Owned and Operated Facilities													
	E.11.a.i	Task Description	By year 2 the Permittee shall develop and maintain an inventory of Permittee-owned or operated facilities that are a threat to water quality, if applicable.	2015	2	RMA-DPW		x	no	x	x	x	No equivalent BMP exists, thus the new BMP should result in better protection of local water quality.
	E.11.a.ii	Implementation Level	Extensive list of Permittee-owned or operated facilities that are potential significant sources of pollution in storm water (see permit for list)	2015	2	RMA-DPW		x	no	x	x	x	No equivalent BMP exists, thus the new BMP should result in better protection of local water quality.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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						Local MS4 Dept	SIE, Regional Organization or Co-permittee						
	E.11.a.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2015	2	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
	E.11.b	Map of Permittee-owned or Operated Facilities											
	E.11.b.i	Task Description	By year 2 submit a map of the area within the permit boundary and identify where the inventoried Permittee-owned or operated facilities are located.	2015	2	RMA-DPW		x	no	x	x	x	No equivalent BMP exists, thus the new BMP should result in better protection of local water quality.
	E.11.b.ii	Implementation Level	The map identifying the location of Permittee-owned or operated facilities shall identify the storm water drainage system (e.g. storm water outfalls or other mechanisms in which storm water leaves the site) corresponding to each facility as well as the receiving waters to which these facilities discharge. The map shall also show the facility and the manager of each facility, including contact information.	2015	2	RMA-DPW		x	no	x	x	x	No equivalent BMP exists, thus the new BMP should result in better protection of local water quality.
	E.11.b.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2015	2	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
	E.11.c	Facility Assessment											
	E.11.c.i	Task Description	By year 3, for all inventoried Permittee-owned or operated facilities, the Permittee shall conduct a comprehensive inspection and assessment of pollutant discharge potential and identification of pollutant hotspots using the Center for Watershed Protections' (CWP) guide on Urban Subwatershed and Site Reconnaissance, or equivalent.	2016	3	RMA-DPW		x	no	x	x	x	Since the new permit requires a much more detailed inspection and assessment, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.c.ii	Implementation Level	Conduct an annual review and assessment of all municipally owned or operated facilities to determine their potential to impact surface waters. The assessment shall include a. Identification of hotspots (see permit for factors, prioritization, minimum hotspot facilities) b. Documentation of the comprehensive assessment procedures and results, including copies of any site evaluation checklists. <i>Note: "Hotspots" are specific operations in a subwatershed that may generate high storm water pollution.</i>	2016	3	RMA-DPW		x	no	x	x	x	Since the new permit requires a much more detailed review and assessment, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
6-7.a	E.11.c.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2016	3	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
6-7.b	E.11.d	Stormwater Pollution Prevention Plans											
6-7.c	E11.d.i	Task Description	By year 4 the Permittee shall develop and implement SWPPPs for pollutant hotspots. If permittee has an existing hazardous materials business plan, spill prevention plan, or other equivalent document, the Permittee is not required to develop a SWPPP.	2017	4	RMA-DPW		x	no	x	x	x	Since the new permit re-defines "hotspot", no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
6-7.d	E11.d.ii	Implementation Level	a. Develop and implement a site-specific SWPPP b. SWPPP shall be kept on site at each owned or operated facility and updated as necessary c. SWPPP shall address the minimum elements listed in the permit	2017	4	RMA-DPW		x	no	x	x	x	Since the new permit re-defines "hotspot", no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)	Corresponding Permit Section												
	A.1.b.4.a: Overall Planning												
	A.1.b.4.b						A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT		Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
						Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
	E11.d.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2017	4	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
6-11.b	E11.e	Inspections, Visual Monitoring and Remedial Action						x	x	x	x	x	x
	E.11.e.i	Task Description	By year 5 the Permittee shall conduct regular inspections of Permittee-owned and operated facilities.	2018	5	RMA-DPW		x	no	x	x	x	Since the new permit requires a much more detailed inspection and assessment, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.e.ii	Implementation Level	a. Quarterly visual inspections in accordance with inspection procedures and checklists developed by each Permittee, results shall be kept with the SWPPP including any noted deficiencies and corrective actions b. Annual hotspot comprehensive inspection, results shall be kept with the SWPPP including any noted deficiencies and corrective actions c. Quarterly hotspot visual observations, results shall be kept with the SWPPP including any noted deficiencies and corrective actions d. Inspect each non-hotspot inventoried facilities at least once per permit term.	2018	5	RMA-DPW		x	no	x	x	x	Since the new permit re-defines "hotspot", no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.e.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2018	5	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
	E.11.f	Storm Drain System Assessment and Prioritization						x	x	x	x	x	x
	E.11.f.i	Task Description	By year 2 the Permittee shall develop and implement procedures to assess and prioritize MS4 storm drain system maintenance, including receiving water bodies within the Permittee's urbanized area and detention basins. If flood control maintenance is undertaken by another entity, the Permittee shall coordinate with the flood conveyance management entity by year 3 to assess and prioritize maintenance of MS4 storm drain system.	2015	2	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for assessment and prioritization for system maintenance, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.f.ii	Implementation Level	A. Assess/prioritize MS4 storm drain system facilities within the Permittee's urbanized area based on criteria found in the permit	2015	2	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for assessment and prioritization for system maintenance, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.f.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2015	2	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
	E.11.g	Maintenance of Storm Drain System											

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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						Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
6-11.a	E.11.g.i	Task Description	By year 3 the Permittee shall begin maintenance of all high priority storm drain systems on an ongoing schedule.	2016	3	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for assessment and prioritization for system maintenance, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E.11.g.ii	Implementation Level	a. Inspect storm drain systems based on priorities assigned in Section E.11.f.ii(a), at minimum inspect all high priority catch basins and systems annually b. Clean storm drain systems c. Label catch basins d. Maintain surface drainage structures e. Dispose of waste materials (refer to permit for additional information)	2016	3	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for assessment and prioritization for system maintenance, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	E-191	E.11.g.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2016	3	RMA-DPW		x	no	x	x	x
E.11.h Permittee Operations and Maintenance Activities (O&M)													
6-10.b	E.11.h.i	Task Description	By year 3 the Permittee shall assess their O&M activities for potential to discharge pollutants in storm water and inspect all O&M BMPs on a quarterly basis.	2016	3	EHB, RMA-DPW		x	x	x	x	x	x
	E.11.h.ii	Implementation Level	a. Develop and implement a program to assess O&M activities and subsequently develop applicable BMPs (see permit for list of activities to included in assessment) b. Identify all materials that could be discharged from O&M activities and which materials contain pollutants c. Develop and implement a set of BMPs that when applied during O&M activities will reduce pollutants in storm water and non-storm water discharges, permittee shall use CASQA Municipal Handbook or equivalent d. Evaluate BMPs on a quarterly basis. (refer to permit for additional information)	2016	3	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for assessment, including site specific BMPs and reference to CASQA Municipal Handbook, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
	6-10.a	E.11.b.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2016	3	RMA-DPW		x	no	x	x	x
6-10.c Incorporation of Water Quality and Habitat Enhancement Features in Flood Management Facilities													
	E.11.i.i	Task Description	By year 3 the Permittee shall develop and implement a process for incorporating water quality habitat enhancement features into new and rehabilitated flood management facilities.	2016	3	RMA-DPW, MCWRA		x	no	x	x	x	Since the new permit requires a higher level of detail for water quality and habitat enhancement features, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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	Local MS4 Dept	SIE, Regional Organization or, Co-permittee											
6-10.d	E.11.i.ii	Implementation Level	The permittee shall develop and implement a process to incorporate water quality and habitat enhancement features in the design of all new and rehabilitated flood management projects that are associated with the MS4 or that discharge to the MS4.	2016	3	RMA-DPW, MCWRA		x	no	x	x	x	Since the new permit requires a higher level of detail for water quality and habitat enhancement features, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
6-10.e	E.11.i.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2016	3	RMA-DPW, MCWRA		x	x	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
6-10.f	E.11.j Landscape Design and Maintenance												
6-2.a	E.11.j.i	Task Description	By year 2 the Permittee shall implement a landscape design and maintenance program to reduce the amount of water, pesticides, herbicides and fertilizers used during Permittee operations and activities	2015	2	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for evaluation, including limits based on federal regulations, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
6-3.a	E.11.j.ii	Implementation Tasks	At minimum, Permittee shall: a. Evaluate pesticides, herbicides and fertilizers used and application activities performed and identify pollution prevention and source control opportunities b. Implement practices that reduce the discharge of pesticides, herbicides, and fertilizers c. Record the types and amounts of pesticides, herbicides, and fertilizers used in the permit area (refer to permit for additional detail).	2015	2	RMA-DPW		x	no	x	x	x	Since the new permit requires a higher level of detail for evaluation, including limits based on federal regulations, no equivalent BMP exists. Thus, the new BMP should result in better protection of local water quality.
6-5.a	E.11.j.iii	Reporting	Permittee shall submit a summary of past year's activities to SMARTS and certify compliance with all requirements of this program element. The summary shall also address the relationship to the Permittee's Program Effectiveness Assessment and Improvement Plan.	2015	2	RMA-DPW		x	no	x	x	x	Certification from decision making personnel makes them accountable and will lead to a more concerted effort to meet the new permit requirements. This should result in better protection of local water quality.
6-6.a													
6-6.b													
6-7.e													
6-7.f													
6-8.b													
6-9.a													
6-4.a													
6-4.b													

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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					Local MS4 Dept	SIE, Regional Organization or, Co-permittee								
E.12 POST CONSTRUCTION STORMWATER MANAGEMENT PROGRAM														
E.12.a Post Construction Measures Regulate development to comply with the following sections, E.12.b through E.12.l														
E.12.b Site Design Measures														
5-2.b	E.12.b.i	Require implementation:	Require implementation of site design measures on projects that create or replace 2,500-5,000 SF impervious area (includes single family homes).	2015	2	RMA-DPW, MCWRA	Both	x	No New design measures include porous pavement, green roofs and soil quality improvement & maintenance.	Using the "Development projects plan review and inspection procedures" contained in Appendix E, review 100% of project plans subject to the post-construction requirements of the storm water ordinance for compliance with this ordinance during design and construction	x	x	x	
5-5.a	E.12.b.ii	Reporting Requirements:	Require use of the SMARTS Post-Construction Calculator or equivalent to quantify runoff reduction resulting from site design measures	2015	2	RMA-DPW, MCWRA			no	Summarize relationship between the program element activities and the Permittee's Program Effectiveness Assessment & Improvement Plan that tracks annual and long-term effectiveness of the storm water program	Develop municipality specific hydromodification control criteria	x	x	x
5-6.a										Select Applicability Thresholds for application of hydromod control criteria				
E.12.c Regulated Projects														
5-2.b	E.12.c.i	Implement standards:	Projects that create or replace >5,000 SF impervious area, aka Regulated Projects	2015	2	RMA-DPW, MCWRA			no	Road and Utility Projects creating 5,000 sf or more that are public or fall under planning authority of a city shall comply with LID except 85th % can follow EPA Guidance on green infrastructure	Using the "Development projects plan review and inspection procedures" contained in Appendix E, review 100% of project plans subject to the post-construction requirements of the storm water ordinance for compliance with this ordinance during design and construction	x	x	x
5-5.a										Develop municipality specific hydromodification control criteria	x	x	x	
5-6.a										Select Applicability Thresholds for application of hydromod control criteria				
5-2.b	E.12.c.ii	Shall Require:	Regulated Projects to implement measures for site design, source control, runoff reduction, storm water treatment and baseline hydromodification management as defined in this Order.	2015	2	RMA-DPW, MCWRA			no	Where a redevelopment projects results in an increase of more than 50% of the impervious surface of a previously existing development, runoff from the entire project, consisting of all existing, new, and/or replaced impervious surfaces, must be included to the extent feasible	Using the "Development projects plan review and inspection procedures" contained in Appendix E, review 100% of project plans subject to the post-construction requirements of the storm water ordinance for compliance with this ordinance during design and construction	x	x	x
5-5.a										Develop municipality specific hydromodification control criteria				
5-6.a										Select Applicability Thresholds for application of hydromod control criteria				
E.12.d Source Control Measures -														
5-3.a	E.12.d.i	Required to implement:	Standard permanent and/or operation source control measures as applicable on Regulated Projects with pollutant-generating activities and sources	2015	2	RMA-DPW, MCWRA		x	no	Use the "Post-Construction BMPs for New development and Redevelopment and the "Post-construction site inspection checklist" contained in Appendix E to inspect projects and/or require self certification by owner following completion of construction.	x	x	x	

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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					Local MS4 Dept	SIE, Regional Organization or Co-permittee							
5-3.b									Using the "Protocol for taking action against violators of Municipal Stormwater Ordinance." and the enforcement provisions of the each Permittee's storm water ordinance, MS4 will enforce post construction compliance with its storm water ordinance.				
5-4.c	E.12.d.i	Measures shall be design:	Consistent with recommendations from the CASQA Stormwater BMP Handbook for New Development & Redevelopment or equivalent manual	2015	2	RMA-DPW, MCWRA	Both	x	No New permit requirements include a more extensive list of pollutant generating activities and sources.	Implement hydromodification controls and LID for all applicable new and redevelopment projects. Develop municipality specific hydromodification control criteria	x	x	x
5-5.a									Select Applicability Thresholds for application of hydromod control criteria				
5-6.a									Make LID BMP Design Guidance available for all stakeholders.				
5-7.a									Develop guidance for achieving compliance with hydromod control criteria and LID requirements for project applicants.				
5-7.b									Implement procedures for the permit application review process to ensure LID applied to 100% of all applicable new development and redevelopment projects.				
5-7.e													
E.12.e LID Standards													
5-3.a	E.12.e.i	Regulated Projects to Implement:	LID standards to treat stormwater and provide baseline hydromod mgmt to meet numeric sizing criteria under E.12.e(ii)c	2015	2	RMA-DPW, MCWRA		x	no	Use the "Post-Construction BMPs for New development and Redevelopment and the "Post-construction site inspection checklist" contained in Appendix E to inspect projects and/or require self certification by owner following completion of construction.	x	x	x
5-3.b	E.12.e.ii	Adopt & Implement:	Requirements & standards to ensure design and construction of development projects achieve LID Design Standards detailed in this section	2015	2	RMA-DPW, MCWRA	Design Standards include Site Assessment, Drainage Management Areas, Numeric Sizing Criteria, Retention & Treatment, Sight Design Measures (E.12.b), Source Control (E.12.d), & Baseline Hydromodification management measures		No New permit requirements are more detailed for hydrolic sizing design criteria for water retention & treatment; Hydromodification management measures treats runoff not treated by site design measures	Using the "Protocol for taking action against violators of Municipal Stormwater Ordinance." and the enforcement provisions of the each Permittee's storm water ordinance, MS4 will enforce post construction compliance with its storm water ordinance.			
5-4.c	E.12.e.iii	Reporting through SMARTS to include:	Summarize relationship between the program element activities and the Permittee's Program Effectiveness Assessment & Improvement Plan that tracks annual and long-term effectiveness of the storm water program	2015	2	RMA-DPW		x	no	Implement hydromodification controls and LID for all applicable new and redevelopment projects. Develop municipality specific hydromodification control criteria	x	x	x
5-5.a									Select Applicability Thresholds for application of hydromod control criteria				
5-6.a									Make LID BMP Design Guidance available for all stakeholders.				
5-7.a									Develop guidance for achieving compliance with hydromod control criteria and LID requirements for project applicants.				
5-7.b									Implement procedures for the permit application review process to ensure LID applied to 100% of all applicable new development and redevelopment projects.				
5-7.e													
E.12.f Hydromodification Management													
5-3.a	E.12.f.i	Hydromodification Management procedures shall apply to:	All regulated projects that create and/or replace 1 acre or more of impervious area	2016	3	RMA-DPW, MCWRA		x	no	Use the "Post-Construction BMPs for New development and Redevelopment and the "Post-construction site inspection checklist" contained in Appendix E to inspect projects and/or require self certification by owner following completion of construction.	x	x	x

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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5-3.b	E.12.f.ii	Implement Hydromodification Standards that limit:	Post-project runoff not to exceed estimated pre-project flow rate subject to the project location's geomorphic province shown on Figure 1	2016	3	RMA-DPW, MCWRA		For cities within Monterey County, Post-project runoff shall not exceed estimated pre-project flow rate for the 2-year, 24-hour storm	no	Using the "Protocol for taking action against violators of Municipal Stormwater Ordinance." and the enforcement provisions of the each Permittee's storm water ordinance, MS4 will enforce post construction compliance with its storm water ordinance.	x	x	x
5-4.c	E.12.f.iii	Reporting through SMARTS to include:	Summarize relationship between the program element activities and the Permittee's Program Effectiveness Assessment & Improvement Plan that tracks annual and long-term effectiveness of the storm water program	2016	3	RMA-DPW		x	no	Implement hydromodification controls and LID for all applicable new and redevelopment projects.	x	x	x
5-5.a										Develop municipality specific hydromodification control criteria			
5-6.a										Select Applicability Thresholds for application of hydromod control criteria			
5-7.a										Make LID BMP Design Guidance available for all stakeholders.			
5-7.b										Develop guidance for achieving compliance with hydromod control criteria and LID requirements for project applicants.			
5-7.e										Implement procedures for the permit application review process to ensure LID applied to 100% of all applicable new development and redevelopment projects.			
E.12.g Enforceable Mechanisms													
5-1.a	E.12.g.i	Develop or modify:	Enforceable mechanisms to implement E.12.b - E.12.f	2016	3	RMA-PD, RMA-DPW	Both	x	no	Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.	x	x	x
5-2.a	E.12.g.ii	Review municipal codes, regulations, standards and specifications to:	Identify modifications and/or additions necessary to fill gaps, remove impediments, and resolve regulatory conflicts to effectively implement project-scale development requirements	2016	3	RMA-PD, RMA-DPW	Both	Complete a tracking report indicating the Permittee's accomplishments in education and outreach supporting implementation of LID requirements for new and redevelopment projects	no	Train appropriate staff on the "Development projects plan review and inspection procedures" contained in Appendix E	x	x	x
5-7.c										Provide appropriate education and outreach for all applicable target audiences, including specific guidance for LID BMP design and compliance with hydromod control criteria.			
5-7.d										Create and maintain a tracking report indicating education and outreach program activities addressing LID and hydromod control implementation.			
E.12.h Operation and Maintenance of Post-Construction Stormwater Management Measures													
5-7.f	E.12.h.i	Implementation of:	O&M verification program for stormwater treatment and baseline hydromod (defined in E.12.e.ii.f) on all regulated projects	2015	2	RMA-DPW, MCWRA	Regional	Local vector agency is not a regional entity.	Equivalent	Develop and maintain tracking report for use during the permit application review process that lists LID design principles and features that are incorporated into each applicable new and redevelopment project.	Maintain program element as detailed in Appendix E	x	x
	E.12.h.ii	Minimum O&M Verification Program shall include:	Documentation defining responsible maintenance parties, written implementation plan & database of all Regulated Projects that have installed treatment systems	2015	2	RMA-DPW, MCWRA	Regional	Develop Legal enforceable agreement or mechanism to grant Permittee site access to perform O&M inspections	Equivalent	Develop and maintain tracking report for use during the permit application review process that lists LID design principles and features that are incorporated into each applicable new and redevelopment project.	Maintain program element as detailed in Appendix E	x	x
	E.12.h.iii	Reporting through SMARTS to include:	Summarize relationship between the program element activities and the Permittee's Program Effectiveness Assessment & Improvement Plan that tracks annual and long-term effectiveness of the storm water program	2015	2	RMA-DPW, MCWRA	Regional	x	no	Implement hydromodification controls and LID for all applicable new and redevelopment projects.	x	x	x
E.12.i Post-Construction BMP Condition Assessment													

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)		Corresponding Permit Section											
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		A.1.b.4.b					A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT		Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
	Local MS4 Dept	SIE, Regional Organization or Co-permittee											
5-7.f	E.12.i.i	Inventory and assess:	The maintenance condition of structural post-construction BMPs within permittees jurisdiction	2016	3	RMA-DPW, MCWRA	Regional	x	no	Develop and maintain tracking report for use during the permit application review process that lists LID design principles and features that are incorporated into each applicable new and redevelopment project.	x	x	x
	E.12.i.ii	Implement a plan:	To inventory, map, and determine the relative maintenance condition of structural post-construction BMPs. Maintenance condition shall be determined through a self-certification program where Permittees require annual reports from authorized parties demonstrating proper maintenance and operations	2016	3	RMA-DPW, MCWRA	Regional	Appropriate escalating enforcement based on the Permittee Enforcement Response Plan to ensure proper maintenance of BMPs and <u>submission of self-certification annual reports</u>	no	x	x	x	x
	E.12.i.iii	Reporting through SMARTS to include:	Summarize relationship between the program element activities and the Permittee's Program Effectiveness Assessment & Improvement Plan that tracks annual and long-term effectiveness of the storm water program	2016	3	RMA-DPW, MCWRA	Regional	x	no	Implement hydromodification controls and LID for all applicable new and redevelopment projects.	x	x	x
E.12.j Planning and Development Review Process													
5-1.a	E.12.j.i	Review planning & permitting process:	To assess any gaps or impediments impacting effective implementation of these post-construction requirements specified in Section E.12, and where these are found to exist, seek solutions to promote implementation of these requirements within the context of public safety and community goals for land use.	2016	1-3	RMA-BSD, RMA-PD, RMA-DPW		x	no	Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.	x	x	x
5-2.a	E.12.j.ii	Conduct Review:	Using existing guide or template already developed	2016	1-3	RMA-BSD, RMA-PD, RMA-DPW		Prioritize review of landscape code to correct gaps and impediments impacting effective implementation of post-construction requirements (Review by Year 1, Complete by Year 2)	no	Train appropriate staff on the "Development projects plan review and inspection procedures" contained in Appendix E	x	x	x
5-7.c	E.12.j.iii	Conduct Review:	Summarize review process and any proposed or completed changes to the Permittee's program	2016	2-5	RMA-BSD, RMA-PD, RMA-DPW		Prioritize review of landscape code to correct gaps and impediments impacting effective implementation of post-construction requirements (Review by Year 1, Complete by Year 2)	no	Provide appropriate education and outreach for all applicable target audiences, including specific guidance for LID BMP design and compliance with hydromod control criteria.	x	x	x
5-7.d									no	Create and maintain a tracking report indicating education and outreach program activities addressing LID and hydromod control implementation.			
5-1.a									no	Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.			
5-2.a									no	Train appropriate staff on the "Development projects plan review and inspection procedures" contained in Appendix E			
5-7.c									no	Provide appropriate education and outreach for all applicable target audiences, including specific guidance for LID BMP design and compliance with hydromod control criteria.			

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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	A.1.b.4.b						A.1.b.4.c and d (Required for Renewal Permittees only)					
Element	PERMIT SECTION AND ELEMENT	Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
					Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
5-7.d								no	Create and maintain a tracking report indicating education and outreach program activities addressing LID and hydromod control implementation.			
5-1.a								no	Using the guidance document and model ordinance contained on pages E-84 through E-98 and E-137 through E-143 of Appendix E, each Participating Entity will adopt a storm water ordinance revised to be specific to each entity's needs through appropriate governing body procedures.			
5-2.a								no	Train appropriate staff on the "Development projects plan review and inspection procedures" contained in Appendix E			
5-7.c								no	Provide appropriate education and outreach for all applicable target audiences, including specific guidance for LID BMP design and compliance with hydromod control criteria.			
5-7.d								no	Create and maintain a tracking report indicating education and outreach program activities addressing LID and hydromod control implementation.			
E.12.k	Post Construction Storm Water Management Requirements Based on Assessment and Maintenance of Watershed Processes											
-none-	All applicable MS4s to comply with post-construction storm water management requirements based on a watershed-process approach		Not specified			RMA-DPW, MCWRA	x	no				
E.12.l	Alternative Post-Construction Storm Water Management Program											
-none-	For multiple benefit projects a permittee may propose alternative Post Const. Requirements (ones that address water quality, supply, flood control, habitat enhancement, open space preserve, recreation, climate change)		No date provided - permittee may propose if desired			RMA-DPW Regional	x	no				
E.13	WATER QUALITY MONITORING						2-2.d. Encourage general public participation in programs and activities designed to promote understanding and awareness of storm water pollution, such as cleanup events and restoration activities.					
E.13.a	ASBS Monitoring - MS4s that discharge to ASBS and are covered by an Ocean Plan exception comply with Attachment C	ASBS Scope of Work approved by State Water Board December 2012. Six receiving water sites to be monitored in MRSWMP area through Central Coast ASBS regional monitoring program.	2014	1		Regional (ASBS RMP)	x	no	x	x	x	x
3-7.a	E.13.b. TMDL Monitoring - MS4s w TMDLs must comply with Attachment G and consult with Regional Board within 1 year of effective date to determine monitoring requirements and schedule. And shall implement TMDL monitoring as specified by RB Executive Officer	Required only for Monterey County at this time; may be incorporated into Monterey Bay Regional Monitoring Program (tbd).	2014	1		RMA-DPW	x	no	3-7.a. Develop a watershed-specific Wasteload Allocation Attainment program to control fecal coliform concentrations in urban runoff due to stormwater, domestic animal waste and/or human fecal material discharges that enter the Pajaro River.	x	x	x

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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					Local MS4 Dept	SIE, Regional Organization or, Co-permittee							
2-2.d	E.13.c.	303(d) Monitoring - MS4s discharging to 303(d) listed waterbodies shall consult with Regional Board within 1 year of effective date to determine whether monitoring is necessary.	Required only for Monterey County and City of Monterey at this time; may be incorporated into Monterey Bay Regional Monitoring Program (tbd).	2014	1	RMA-DPW		x	no	2-2.d. Conduct monitoring on these additional outfalls for a similar set of constituents as are monitored under the Urban Watch and First Flush Programs. Monterey County will focus on 303(d) listed water bodies in Year 2, and will expand into the other water bodies over the remaining permit term.	x	x	x
2-2.e	E.13.d.	Receiving Water Monitoring and Special Studies (Select either Receiving Water Monitoring or Special Studies)		2014	1	Regional (MRSWMP)		x	yes	2-2.e. Within the MRSWMP area, the First Flush and Urban Watch monitoring programs will be expanded to include the following: Outfalls which receive drainage from commercial, industrial, or residential areas which meet the following criteria: (1) Are over 18" in diameter, and (2) are safe for volunteers/staff to access, including those that discharge to a 303(d) listed water body	Reduce	Recommend continuing to monitor non-ASBS sites within MRSWMP area until development of a regional program for long term data trends assessment	Discussion with Regional Board required
	E.13.d.1	Receiving Water Monitoring	Would Apply only to Monterey County (population >50,000), but Not Applicable due to its ASBS and TMDL monitoring requirements.	2014	1	n/a (RMA-DPW)		x	no		x	x	
	E.13.d	Select one urban/rural site and one urban area site to monitor		2014	1	n/a (RMA-DPW)		x	no		x	x	To be achieved through ASBS monitoring for the MRSWMP group
	E.13.d	Complete and have available a report that includes a summary of baseline data collections and discussion of monitoring program results		2015	2	n/a (RMA-DPW)		x	no	(ASBS) Reports to be prepared for rain years 13/14 and 14/15.	x	x	To be achieved through ASBS monitoring for the MRSWMP group
	E.13.d	Complete and have available a report that includes a comparison of data collection to baseline data and discussion of monitoring program results	Non-ASBS parties have less that 50,000 in population per entity - not required.	2018	5	n/a		x	no		x	x	To be achieved through ASBS monitoring for the MRSWMP group
2-3.a	E.13.d.2	Special Studies	Non-ASBS parties have less that 50,000 in population per entity - not required.	n/a	n/a	n/a		x	yes	2-3.a. A representative from the MRSWMP group will become an active participant in the Citizen Watershed Monitoring Network.	Cease		Not an active group/ meetings are infrequent
2-2.d	E.13.d			n/a	n/a	RMA-DPW		x	No	2-2.d. Prioritize Pollutants of Concern (see under the heading titled "Selection of BMPs and Measurable Goals" of Section 4 of the MRSWMP monitoring) data; conduct source tracking using upstream monitoring for the highest priority pollutants and use this to identify probable sources under Minimum Control Measure No. 3 and take appropriate corrective actions in accordance with BMPs 3-3.d and 3-4.a.	Reduce	x	Covered by IDDE program
2-2.d	E.13.d			n/a	n/a	Regional (MRSWMP)		x	yes	2-2.d. Provide financial support for, or assistance with, volunteer monitoring programs and public participation events such as: Urban Watch, First Flush, Snapshot Day, and Walk N' Talk Days	Reduce	x	Pending further discussions and input from Monterey Bay National Marine Sanctuary Water Quality Division and Regional Board. Cities of Monterey and Pacific Grove implement Urban Watch independent of the MRSWMP.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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2-2.d	E.13.d		n/a	n/a	not applicable to Monterey County		x	yes	Volunteer Monitoring Program (Urban Watch) (BMP 2-2.d): This has been done by the Cities of Monterey and Pacific Grove for several years. Volunteers are trained in May and monitor storm drain outfalls during the dry weather season between June and October/November. Volunteer groups take samples approximately twice each month and analyze the samples for specific indicators with an EPA-approved LaMotte testing kit. This is a good way to ascertain the baseline level of water quality for your city. It helps to pinpoint areas with problems from detergents, solvents, etc. Volunteers also act as educators to the public answering questions about their efforts.	Cease	x	Extensive monitoring to be implemented through ASBS RMP. Urban Watch to be continued by City of Pacific Grove, may be continued by Monterey.	
	E.13.d	Develop and implement special study monitoring program and submit to Regional Board for review and approval	Non-ASBS parties have less than 50,000 in population per entity - not required.	2014	1	n/a	n/a	x	No	MRSWMP monitoring during first permit term should cover this.	x	x	Discuss baseline data from first permit term with MBNMS and CC RWB
	E.13.d	Complete and have available a report that includes a summary of baseline data collections and discussion of monitoring program results	Non-ASBS parties have less than 50,000 in population per entity - not required.	2015	2	n/a	n/a	x	No	MRSWMP monitoring during first permit term should cover this.	x	x	x
	E.13.d	Complete and have available a report that includes a comparison of data collection to baseline data and discussion of monitoring program results	Non-ASBS parties have less than 50,000 in population per entity - not required.	2018	5	n/a	n/a	x	No	MRSWMP monitoring during first permit term should cover this.	x	x	x
E.14 PROGRAM EFFECTIVENESS ASSESSMENT													
throughout	E.14.A.i	Program Effectiveness and Improvement Plan	Develop and implement a Program Effectiveness Assessment and Improvement Plan that tracks annual and long-term effectiveness of the storm water program. The goal is to improve program effectiveness at reducing targeted pollutants of concern, achieving the MEP standard, and protecting water quality. Permittees to identify a strategy used to gauge the effectiveness of prioritized BMPs and program implementation as a whole.	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, requires an EA IP assessment over the Permit Term, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.ii.a	Program Effectiveness and Improvement Plan	EA IP to include: 1) Identification of overall program goals including POC and prioritized BMPs 2) Documentation of the level of implementation of storm water program elements 3) Identification and targeting of target audience(s) 4) Assessment of BMP performance at achieving outcome levels 5) Assessment of pollutant source reductions achieved by individual BMPs 6) Quantification of pollutant loads and pollutant load reductions achieved by the program as a whole 7) MS4 discharge quality, where available, including analysis of the data 8) Receiving water quality data, including analysis of the data 9) Identification of long-term effectiveness assessment, to be implemented beyond the permit term	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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throughout	E.14.a.ii.b	Program Effectiveness and Improvement Plan	Outcome Levels: 1) Storm water program activities 2) Awareness 3) Behavior 4) Pollutant load reductions 5) MS4 discharge quality (where assessment is supported by MS4 discharge quality data) 6) Receiving water conditions	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.ii.c	Program Effectiveness and Improvement Plan	The Program Effectiveness Assessment and Improvement Plan shall identify assessment methods for privately owned BMPs.	2015	2	RMA-DPW		x	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.ii.d	Program Effectiveness and Improvement Plan	(d) The Program Effectiveness Assessment and Improvement Plan shall identify assessment methods the Permittee will use to quantitatively assess BMP performance at reducing pollutant loads wherever feasible, using the following or equivalent methods: 1) Direct quantitative measurement of pollutant load removal for BMPs that lend themselves to such measurement (e.g., measuring sediment collected through street-sweeping activities); 2) Science-based estimates of pollutant load removal for BMPs where direct measurement of pollutant removal is overly challenging (e.g., removal of heavy metals through a bioswale); 3) Direct quantitative measurement of behaviors that serve as proxies of pollutant removal or reduction (e.g., the percentage of construction sites demonstrated by inspection to be in compliance with permit conditions); or 4) Visual comparison (e.g., using photographs to compare the amount of trash in a creek between one year and the next).	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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					Local MS4 Dept	SIE, Regional Organization or Co-permittee							
throughout	E.14.a.ii.e	Program Effectiveness and Improvement Plan	(e) The Program Effectiveness Assessment and Improvement Plan shall ask and answer the following Management Questions for prioritized BMPs for which answers to management questions can be based on quantitative data appropriate to the question being answered. 1) Were prioritized BMPs or group of BMPs implemented in accordance with the permit requirements? The Permittee shall develop quantitative data using the following or equivalent methods: a) Confirmation – Documenting whether an activity or task has been completed, expressed as positive or negative outcome (i.e., yes or no) b) Tabulation – Simple accounting expressed in absolute (e.g., number of people participating), or relative terms (e.g. percent increase in recycled household hazardous waste) 2) To what extent did prioritized BMPs or group of BMPs change the target audience's behavior? The Permittee shall develop quantitative data using the following or equivalent methods: a) Surveys or interviews to discern knowledge, attitudes, awareness, behavior of specific population, etc. b) Interviews of site personnel to discern awareness and behavior c) Inspections or site visits to directly observe or assess a practice. 3) To what extent did prioritized BMPs or group of BMPs reduce pollutant loads from their sources to the storm drain system?	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.ii.f	Program Effectiveness and Improvement Plan	(f) EA IP to include water quality monitoring data to determine: 1) To what extent did implementation of the BMP, group of BMPs, or storm water program enhance or change the urban runoff and discharge quality? 2) To what extent did implementation of the BMP, group of BMPs, or storm water program enhance or change receiving water quality? 3) Did exceedance(s) of water quality objectives or water quality standards persist notwithstanding implementation of the storm water program? The Program Effectiveness Assessment and Improvement Plan shall include documentation of the effectiveness of BMPs implemented to reduce the discharge of pollutants to the MS4 to the MEP and protect water quality.	2015	2		Regional (MRSWMP)	Needs to be based on regionally available data	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.iii	Program Effectiveness and Improvement Plan	EA IP (Part I) By the second year Annual Report complete and submit the Program Effectiveness Assessment and Improvement Plan. The Plan shall include the strategy the Permittee will use to assess the effectiveness of the program, the specific measures the Permittee will use to assess the effectiveness of BMPs and/or groups of BMPs, and how the Permittee will use the information obtained through effectiveness assessment to modify individual BMPs and the program as a whole to increase short and long-term effectiveness.	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.a.iii	Program Effectiveness and Improvement Plan	(EA IP (Part II) In subsequent Annual Reports, describe implementation of the Program Effectiveness Assessment and Improvement Plan, summarize data obtained through effectiveness assessment measures and the short and long-term progress of the storm water program, and provide an analysis of the data to improve program effectiveness, to achieve the MEP standard, protect water quality, and to document the Permittee's compliance with permit conditions. Permittees that have a Program Effectiveness Assessment and Improvement Plans, or equivalent, approved by the applicable Regional Board, or that have a schedule approved by the applicable Regional Board to develop and implement such a Plan, shall adhere to the Plan and/or schedule approved by the Regional Board unless otherwise directed by the Regional Board.	2016	3	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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	A.1.b.4.a: Overall Planning												
	A.1.b.4.b						A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT	Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))	
					Local MS4 Dept	SIE, Regional Organization or Co-permittee							
throughout	E.14.a.iii	Program Effectiveness and Improvement Plan	EA IP (Part III) By the fifth year annual report, complete and submit an analysis of the effectiveness of modifications made at improving BMP and/or program effectiveness. Coordinate with RWQCB on expectations, timing and frequency of BMP modifications.	2018	5	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.b.i	Program Effectiveness and Improvement Plan	Assess effectiveness of: removing pollutant loads, achieving MEP standard, and protecting water quality. Identify priority areas for program improvement, make changes as necessary per RWQCB approval	2015	2	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
throughout	E.14.b.ii	Program Effectiveness and Improvement Plan	(ii) Implementation Level – Within the fifth year of the effective date of the permit, the Permittee shall identify and summarize BMP and/or program modifications identified in priority program areas. Modifications shall include: (a) Improving upon BMPs that are underperforming (b) Continuing and expanding upon BMPs that proved to be effective, including identifying new BMPs or modifications to existing BMPs designed to increase pollutant load reductions; (c) Discontinuing BMPs that may no longer be productive and replacing with more effective BMPs; and (d) Shifting priorities to make more effective use of resources	2018	5	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	The proposed BMP is more effective of protecting water quality protection than existing comparable BMP.
throughout	E.14.b.iii	Program Effectiveness and Improvement Plan	Submit list of BMP and/or program modifications (E.14.c(ii)) for priority program areas, including identification of priority program areas and the schedule the Permittee will follow to complete identified modifications during the next permit term. The modifications shall be aimed at the goal of reducing pollutant loads, achieving the MEP standard and protecting water quality.	2018	5	RMA-DPW	Both (MRSWMP)	Prepare for both Regional Programs and for local implementation programs	no	x	Cease	x	The proposed BMP is more effective of protecting water quality protection than existing comparable BMP.
E.15 TOTAL MAXIMUM DAILY LOADS COMPLIANCE REQUIREMENTS													
3-7.a	E.15.a	Comply with all approved TMDLs (Attachment G)		2014	1	RMA-DPW		x	no	x	Cease	x	The new requirement will provide greater protection of local water quality.
3-7.a	E.15.b	Waste load allocations are incorporated herein by reference as enforceable parts of this Order		2014	1	RMA-DPW		x	no	x	Cease	x	The new requirement will provide greater protection of local water quality.
3-7.a	E.15.c	Regional Board reviews TMDLs within one year of effective date and may propose modifications to requirements		2014	1	RMA-DPW		x	no	x	Cease	x	The new requirement will provide greater protection of local water quality.
3-7.a	E.15.d	Report status of implementation via SMARTS		2014	1	RMA-DPW		x	no	x	Cease	x	The new requirement will provide greater protection of local water quality.
3-7.a	E.15.e	Comply with Clean Water Act Sections 303d,306b and 314		2014	1	RMA-DPW		x	no	x	Cease	x	The new requirement will provide greater protection of local water quality.
E.16 ANNUAL REPORTING PROGRAM													
	E.16.a	Use SMARTS to report and certify		2014-2018	All	RMA-DPW		x	x	x			
	E.16.b	Complete and retain annual reports and make available to RWQCB during working hours		2014-2018	All	RMA-DPW		x	x	x			
	E.16.c	Submit detailed written or oral report to RWQCB if directed.		2014-2018	All	RMA-DPW		x	x	x			
	E.16.d	May coordinate reporting if regional programs		2014-2018	All	RMA-DPW		x	x	x			
A ATTACHMENT A - COMMUNITY BASED SOCIAL MARKETING													

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)	Corresponding Permit Section												
	A.1.b.4.a: Overall Planning												
	A.1.b.4.b					A.1.b.4.c and d (Required for Renewal Permittees only)							
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					Local MS4 Dept	SIE, Regional Organization or, Co-permittee							
1-1.a 1-1.b etal	A.1.i-iv	Program Development / Implementation	PE PO program options: (1) Countywide, (2) Regional, (3) Jurisdictional effort, or (4) Combination of 1 - 3.	2014	1		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
1-1.a 1-1.b etal	A.1.i-iv	Program Development / Implementation	Report on option chose 1 - 4 above and submit copy of region wide document supporting program chosen.	2014	1		Regional (MRSWMP)	x	no	x	Cease	x	This requirement just documents program participant obligations.
1-1.a 1-1.b etal	A.2.a.i	Comprehensive program	Develop and implement a comprehensive storm water public education and outreach program that shall (1) measurably increase the knowledge of targeted communities regarding the municipal storm drain system, impacts of urban runoff and non-storm water discharges on receiving waters, and potential BMP solutions for the target audiences and (2) measurably change the behavior of target audiences, thereby reducing pollutant releases to the MS4 and the environment.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
1-1.a 1-1.b etal	A.2.a.ii.a	Comprehensive program	Permittee shall (a) Develop and implement strategy based on water quality problems, target audiences, and anticipated task effectiveness. Identify responsible parties per task(s), identify task implementation schedule, and identify the budget. The strategy must demonstrate how specific high priority storm water quality issues in the community or local pollutants of concern are addressed. The Permittee shall use CBSM 1 strategies or equivalent.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
1-1.a 1-1.b etal	A.2.a.ii.b	Survey	Permittee shall (b) Implement two surveys during the permit term to gauge the level of awareness and behavior change in target audiences and effectiveness of education tasks.	2 x	2 x		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
1-1.a 1-1.b etal	A.2.a.ii.c	Research and Development	Permittee shall (c) Use CBSM strategies or equivalent to include: (1) Research on barriers to desired behaviors and benefits of desired behaviors (ex. Literature review, observation, focus groups). (2) Elicit commitment to implement desired behavior from target audience. (3) Provide prompts reminding target audience of desired behavior. (4) Use the concept of social norms/modeling of desired behavior. (5) Use education messages that are specific, easy to remember, from a credible source, and appropriate for the target audience. (6) Create incentives for the desired behavior. (7) Remove barriers to the desired behavior.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	Simply CBSM is the preferred strategy of the State Water Board.
1-1.a 1-1.b etal	A.2.a.ii.d		Permittee shall (d) Develop and convey a specific storm water message that focuses on: (1) Local pollutants of concern (2) Target audience (3) Behavior of concern (4) Regional water quality issues	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
1-1.a 1-1.b etal	A.2.a.ii.e	Multi-media	Permittee shall: (e) Develop and disseminate appropriate educational materials to target audiences and translate into applicable languages when appropriate (utilize various media);	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)	Corresponding Permit Section												
	A.1.b.4.a: Overall Planning												
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Element	PERMIT SECTION AND ELEMENT		Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
						Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
1-1.a 1-1.b etal	A.2.a.ii.f	PP / PI	Permittee shall: (f) Utilization of public input in the development of the program;	2015	2		Regional (MRSWMP)	x	No	x	Cease	New permit requirements will illicit more public involvement from the on-set thus likely leading to a more effective program.	The existing and new requirements are very similar thus a change will not result in additional water quality impairments.
1-1.a 1-1.b etal	A.2.a.ii.g	Objectives	Permittee shall: (g) Distribute educational materials to convey the program's message to 20% of the target audience each year;	2015	2		Regional (MRSWMP)	x	no	x	Cease	The requirement will ensure program consistency and continuity throughout the region which should improve the publics knowledge concerning water quality.	New permit sets measurable goals, thus it will likely result in greater water quality protection.
1-1.a 1-1.b etal	A.2.a.ii.h	Water Efficient Landscape Ordinance	Permittee shall: (h) Coordinate outreach programs with the Water Efficient Landscape Ordinance to explain the benefits of storm water-friendly landscaping;	2015	2		Regional (MRSWMP)	x	no	x	Cease	This requirement will bring two worthwhile elements together to enhance the protection of local water quality.	Existing permit doesn't specifically address the concept of "water efficient landscapes", but does address the concept of drought tolerant landscapes. Thus, the new requirement will likely result in a reduction in the use of herbicides, pesticides and fertilizers resulting in less discharge. Also, the new permit sets measurable goals, thus it will likely result in greater water quality protection.
1-1.a 1-1.b etal	A.2.a.ii.i	Water Efficient Landscape Ordinance	Permittee shall offer: (i) Technical and financial assistance and implementation guidance related to storm water-friendly landscaping;	2015	2		Regional (MRSWMP)	x	no	x	Cease	Water conservation programs have a direct impact on water quality.	Existing permit doesn't specifically address the concept of providing technical guidance and financial assistance to storm water-friendly landscaping, thus this BMP will likely result in a reduction of various pollutants long term.
3 IDDE 3-1.a 3-1.b	A.2.a.ii.j	Water Efficient Landscape Ordinance	Permittee shall: (j) Develop and convey messages specific to reduce illicit discharges with information about how the public can report incidents to the appropriate authorities;	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
IPM 1-1.a 1-1.b	A.2.a.ii.k	FIFRA	Permittee shall: (k) Develop and convey messages specific to proper application of pesticides, herbicides, and fertilizers;	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
IPM 1-1.a 1-1.b	A.2.a.ii.l	Schools & Experiential Learning	Permittee shall implement a: (l) Storm water education for school-age children. The Permittee may use California's Education and Environment Initiative Curriculum or equivalent.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.
3-6.a	A.2.a.ii.m	Charity car washes, pressure washers, mobile cleaning, etc	Permittee shall implement a PE PO program to: (m) Reduce discharges from charity car washes, mobile cleaning and pressure washing operations, and landscape irrigation.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The proposed section is more prescriptive in regards to the target audience thus ensuring that businesses of a similar water quality risk factor are treated equally creating uniformity and consistency in the program.
1-1.a 1-1.b etal	A.2.a.iii	Reporting Requirements to Maintain	Report on the public education strategy and general program development and progress.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The MRSWMP's PE / PO program is equivalent to the proposed program, thus we can switch over to the new requirements in order to bring continuity and uniformity to the region.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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					Local MS4 Dept	SIE, Regional Organization or Co-permittee							
1-1.a 1-1.b etal	A.2.a.iii A.2.b	Reporting Requirements to Maintain PE PO training	Summarize changes in public awareness and behavior resulting from the implementation of the program and any modifications to the public outreach and education program. Report on the public education and CBSM strategies such as pilot programs, survey results, research on barriers to desired behaviors and benefits of desired behaviors, commitments from target audience to implement desired behavior, prompts, implementation of the social norms/modeling, education messages, incentives for desired behaviors, methods for removing barriers to behavior change, development of education materials, methods for educational material distribution, public input, Water Efficient Landscape Ordinance, technical and financial assistance for storm water friendly landscaping, reporting of illicit discharges, proper application of pesticides, herbicides, and fertilizers, elementary school education, reduction of discharges from charity car washes, mobile cleaning and pressure washing operations, and landscape irrigation efforts. Annually report number of trainings, describe the technical and financial program and implementation, and the study and results to date. For each whole five years of the permit life, submit the online Annual Report summarizing the changes in public awareness and behavior.	2015	5		Regional (MRSWMP)	x	no	x	Cease	x	Overall moving to the EA IP approach will lead to a greater level of local water quality protection. The new permit follows a more well defined approach to EA and IP development, thus leading to more consistency and continuity in program development and implementation.
4-4.b	A.2.b.i	Program Development / Implementation	Permittee shall develop and implement a construction outreach and education program for construction sites smaller than one acre. The goals via a multi-media approach are to (1) measurably increase the knowledge of the construction community regarding the municipal storm drain system, impacts of urban runoff and non-storm water discharges on receiving waters, and potential BMP solutions for the target audiences and (2) measurably changes the behavior of the construction community, thereby reducing pollutant releases to the MS4 and the environment.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The new requirement is more prescriptive and requires inclusion of CBSM, thus likely leading to better water quality protection.
Attachment E	A.2.b.ii.a	Program Development / Implementation	(a) Permittee to develop a watershed-based inventory of the high priority residential and commercial construction sites within the Permittee's jurisdiction.	2015	2	RMA-DPW		x	no	x	Cease	x	The new permit is more prescriptive, thus likely to result in greater water quality protection long term.
4-4.b	A.2.b.ii.b	Program Development / Implementation	(b) Permitted to develop and implement a construction outreach and education strategy that establishes measurable goals and prioritizes education tasks based on water quality problems, target audiences, and anticipated task effectiveness. The strategy will identify responsible party(s) for implementing specific tasks and attaining measurable goals, a schedule for task implementation, and a budget. The strategy must include measurable goals designed to demonstrate how specific high priority storm water quality issues in the community or local pollutants of concern are addressed. Establish who is responsible for specific tasks and goals and a budget for meeting the tasks and goals.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The new permit is more prescriptive, thus likely to result in greater water quality protection long term.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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Local MS4 Dept					SIE, Regional Organization or Co-permittee							
Element												
no	A.2.b.ii.c.	Program Development / Implementation	Implementation of CBSM to address the MS4's highest priority water quality problems on a pilot project level. CBSM techniques found to be effective at the pilot project level shall be implemented jurisdiction-wide by permit year four. Pilot project and jurisdiction level CBSM shall include the following Permittee actions: (1) Research on barriers to desired behaviors and benefits of desired behaviors (ex. Literature review, observation, focus groups). (2) Elicit commitment to implement desired behavior from construction community. (3) Provide prompts reminding construction community of desired behavior. (4) Use the concept of social norms/modeling of desired behavior. (5) Use education messages that are specific, easy to remember, from a credible source, and appropriate for the target audience. (6) Create incentives for the desired behavior. (7) Remove barriers to the desired behavior.	2015	2	Regional (MRSWMP)	x	no	x	Cease	x	The new permit is more prescriptive, thus likely to result in greater water quality protection long term.
no	A.2.b.ii.d.	Annual Report	Report program progress and mechanisms used for outreach and education including measurable increases in the knowledge of the construction community and measurable changes in the construction community's behavior. This includes a watershed-based inventory of high priority residential and commercial construction sites, outreach and education strategy and implementation, implementation of CBSM, pilot project, research on barriers to desired behaviors and benefits of desired behaviors, commitments from target audience to implement desired behavior, prompts, implementation of the social norms/modeling, education messages, incentives for desired behaviors, methods for removing barriers to behavior change.	2015	2	Regional (MRSWMP)	x	no	x	Cease	x	The new permit in addition to being more prescriptive, also employs the EA IP (iterative process) that is likely to result in greater water quality protection.
	A.3.	Permittee staff training	Permittee staff training									
6-1.a 6-3.a 6-4.a 6-7.g 6-8.a	A.3.a.i	Program Development / Implementation	Permittee staff training	2016	3	Regional (MRSWMP)	x	no	x	Cease	x	The new BMP is much more prescriptive thus resulting in greater water quality protection.
6-1.a 6-3.a 6-4.a 6-7.g 6-8.a	A.3.a.ii	Program Development / Implementation	Permittee staff training (ii) Implementation Level – The training program shall include at a minimum: (a) Identification of an illicit discharge or illegal connection. (b) Proper procedures for reporting and responding to the illicit discharge or illegal connection. (c) Follow-up training shall be provided as needed to address changes in procedures, techniques, or staffing. (d) The Permittee shall annually perform an assessment of their trained staff's knowledge of illicit discharge response and shall provide refresher training as needed. (e) New staff that, as part of their normal job responsibilities may be notified of, come into contact with, or otherwise observe an illicit discharge or illegal connection shall be trained no later than six months after the start of employment. (f) Contact information, including the procedure for reporting an illicit discharge, shall be included in each of the Permittee's fleet vehicles that are used by field staff. (g) The Permittee shall conduct focused education in identified illicit discharge flow areas based on identified illicit discharge(s).	2016	3	Regional (MRSWMP)	x	no	x	Cease	x	The new BMP requires annual assessment of staff knowledge regarding Illicit Discharges which will ensure that staff are knowledgeable at detecting and addressing illicit discharges, thus resulting in greater water quality protection.
6-1 6-11	A.3.a.iii	Annual Report	Annual reports to include training rosters and staff IDDE knowledge evaluations	2016	3	Regional (MRSWMP)	x	no	x	Cease	x	The new BMP is much more prescriptive thus resulting in greater water quality protection.
	A.3.b	Staff training										
4-2.a 4-3.a 4-3.c	A.3.b.1.i	Staff training	All staff must be adequately trained	2015	2	Regional (MRSWMP)	x	no	x	Cease	x	The new BMP is much more prescriptive thus resulting in greater water quality protection.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

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no	A.3.b.1.ii	Certifications	All staff must be adequately trained (a) Plan Reviewers and Permitting Staff - Qualified SWPPP Developer (QSD), or working under a QSD (b) Erosion & sediment control inspectors - QSD or QSP, or working under same (c) Contract consultants performing plan review or site inspection must have appropriate certifications	2015	2	RMA-DPW	Possibly	x	no	x	Cease	x	The new BMP is much more prescriptive thus resulting in greater water quality protection.
no	A.3.b.1.iii	Annual Report	Annual report to include; (a) Training topics covered. (b) Dates of training. (c) Number and percentage of Permittee's staff, as identified in Sections a-c above, attending each training. (d) Results of any surveys conducted to demonstrate the awareness and potential behavioral changes in the attendees.	2015	2	RMA-DPW	Possibly	x	no	x	Cease	x	The new permit requires assessing staffs knowledge which will lead to a more involved participant in a training event, thus leading to greater water quality protection.
4-4.b	A.3.b.2.i / ii	Con Site Operator Training	Develop & Distribute Public Education Materials (a) Each year, provide information on training opportunities for construction operators on BMP selection, installation, implementation, and maintenance as well as overall program compliance. (b) Develop or utilize existing outreach tools (i.e. brochures, posters, etc.) aimed at educating construction operators on appropriate selection, installation, implementation, and maintenance of storm water BMPs, as well as overall program compliance. (c) Distribute appropriate outreach materials to all construction operators who will be disturbing land within the MS4 boundary. The Permittee's contact information and website shall be included in these materials. (d) Update the existing storm water website to include information on appropriate selection, installation, implementation, and maintenance of BMPs.	2016	3		Regional (MRSWMP)	x	no	x	Cease	x	The new requirements will ensure that adequate information is provided to contractors, builders and developers covering all aspects of construction site water quality protection measures.
no	A.3.b.2.iii	Annual Report	Annual report to include; include the following information: (a) Training topics covered; (b) Dates of training; (c) Number and percentage of Permittee's operators, inspectors, and number of Contractors attending each training; (d) Results of any surveys conducted to demonstrate the awareness and potential behavioral changes in the attendees. a	2016	3		Regional (MRSWMP)	x	no	x	Cease	x	The new permit requires assessing staffs knowledge which will lead to a more involved participant in a training event, thus leading to greater water quality protection.
no	A.3.c.i	Staff training	Train appropriate staff on pollution prevention and good housekeeping measures Permittee shall determine the need for interim training during alternate years when training is not conducted, through an evaluation of employee Pollution Prevention/Good Housekeeping knowledge. All new hires whose jobs include implementation of pollution prevention and good housekeeping practices must receive this training within the first year of their hire date.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The new permit requires assessing staffs knowledge which will lead to a more involved participant in a training event, thus leading to greater water quality protection.

County of Monterey - Phase II Small MS4 General Permit - Comparison Document

MRSWMP PERMIT COMPARABLE (DRAFT)	Corresponding Permit Section												
	A.1.b.4.a: Overall Planning												
	A.1.b.4.b						A.1.b.4.c and d (Required for Renewal Permittees only)						
Element	PERMIT SECTION AND ELEMENT		Detail & / or Existing	Permit Compliance Year (June 30th unless otherwise noted)	Permit Year	Responsible Implementing Party		Additional implementation notes (i.e., goals, milestones, etc.)	A Is/are existing locally specific SWMP BMP(s) more protective of water quality than minimum requirements of this order? [Y/N] If yes, complete column B. (Or Not Applicable)	Previous SWMP Measurable Goal. Complete this column only if Column A is Yes.	B If Column A is "Yes", indicate if you will Maintain, Reduce or Cease BMP(s) and complete Column C. If Reduce or Cease, also complete column D.	C Provide brief description of locally specific SWMP BMP(s) that is more protective of water quality, including measurable goal(s). Include specific reference to location in existing SWMP.	D Demonstrate that Reduction or Cessation of more protective BMP(s) is in compliance with this Order and the maximum extent practicable standard, and will not result in increased pollutant discharges (Justification for Reduction or Cessation of BMP(s))
						Local MS4 Dept	SIE, Regional Organization or, Co-permittee						
6-1.a 6-3.a 6-4.a 6-7.g 6-8.a	A.3.c.ii.a/d	Staff training	Bi-Annual PP / GH training to include: (a) Bi-annual training for all employees implementing this program element. This bi-annual training shall include a general storm water education component, any new technologies, operations, or responsibilities that arise during the year, and the permit requirements that apply to the staff being trained. Employees shall receive clear guidance on appropriate storm water BMPs to use at municipal facilities and during typical O&M activities. (b) A bi-annual assessment, occurring on alternate years between training, of trained staff's knowledge of pollution prevention and good housekeeping and shall revise the training as needed. (c) A requirement that any contractors hired by the Permittee to perform O&M activities shall be contractually required to comply with all of the storm water BMPs, good housekeeping practices, and standard operating procedures described above. (d) The Permittee shall provide oversight of contractor activities to ensure that contractors are using appropriate BMPs, good housekeeping practices and following standard operating procedures.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The new permit requires assessing staffs knowledge which will lead to a more involved participant in a training event, thus leading to greater water quality protection.
6-1.a 6-3.a 6-4.a 6-7.g 6-8.a	A.3.c.iii	Annual Report	Summarize oversight procedures and identify and track all personnel requiring training and assessment and records.	2015	2		Regional (MRSWMP)	x	no	x	Cease	x	The program element is more prescriptive in form, thus leading to increased program continuity and consistency
	Note: An "x" simply denotes that no information was required.												