



**Santa Clara Valley
Urban Runoff
Pollution Prevention Program**

March 2015

FY 2015-2016 Work Plan



Sections 1-16

**Program, Co-permittee,
and Regional Activities**

**Campbell • Cupertino • Los Altos • Los Altos Hills • Los Gatos • Milpitas • Monte Sereno • Mountain View • Palo Alto
San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Santa Clara Valley Water District**



SECTION 1

INTRODUCTION

INTRODUCTION

This document contains a Work Plan for the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP or Program) and its Co-permittees for fiscal year (FY) 2015-2016. Actions described in the Work Plan are intended to serve as and in support of implementation tasks required by the Municipal Regional Stormwater NPDES Permit (MRP) for the San Francisco Bay Area. The Work Plan was developed in coordination with the development of the Program's FY 2015-2016 approved¹ budget and is consistent with the level of effort represented by the budget items. The Work Plan is for internal Program use².

The Work Plan includes clearly defined actions, responsibilities and schedules to be implemented by the Co-permittees in each individual jurisdiction and collectively through Program area-wide activities, as well as through collaborative efforts being coordinated by Phase I stormwater programs as part of Bay Area Stormwater Management Agencies Association (BASMAA). The Work Plan was developed to include new, expanded or redirected efforts required by the MRP, which was adopted October 14, 2009 and became effective December 1, 2009. Additionally, to the extent possible, it includes tasks associated with requirements anticipated in the reissued MRP.

The Program's FY 2015-2016 Work Plan is comprised of the following components:

- 1) Work Plan Tables for each MRP Provision; and,
- 2) FY 2015-2016 Program Budget Summary.

The MRP Provision Work Plan Tables include a description of all actions required for each MRP provision, organized by sub-provision (e.g., C.3) of the MRP. The tables include a goal statement for each sub-provision, the proposed action(s), implementation schedule and completion dates, and whether actions will be implemented at the Program level, Co-permittee level, and/or coordinated at the Regional level³. In this way, the Program's Work Plan can serve as a Co-permittee work plan or assist Co-permittees in developing their own more refined work plans. Please note that the numbering of the actions in the Work Plan tables does not always begin at #1 and/or numbers are skipped to remain consistent with numbering in tables from previous FY Work Plans.

The implementation schedules are shown by shaded cells for the four quarters of FY 2015-2016. Completion dates presented in **bold** are due dates specified in the MRP, and dates presented in *italics* are internal due dates based on the MRP-required completion dates. The format allows Co-permittees to quickly identify when actions/tasks should be underway; the date to expect the completion of Program and/or Regional (BASMAA) product(s); and, dates when Co-permittee products are required to be completed.

¹ The SCVURPPP Management Committee approved the FY 15-16 budget on December 18, 2014. Contact the Program Manager and/or key staff Dr. Adam Olivieri, P.E. (awo@eoainc.com), Ms. Jill Bicknell, P.E. (jcbicknell@eoainc.com) and Mr. Chris Sommers (csommers@eoainc.com) regarding any questions.

² Formal submission of the Work Plan to the Water Board and approval by the Water Board staff is not required by the MRP, however, it is valuable for Program budgeting and management.

³ Table Legend: "X" = will implement at this level (Program or Co-permittee); "A" = assist with or develop guidance for implementation. Co-permittee assistance with a Program- or regional-level activity can consist of participation in ad hoc task groups or committees, review and approval of products, and/or sponsoring projects of regional benefit.



SECTION 2

MUNICIPAL OPERATIONS

Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.2.a. Street and Road Repair and Maintenance									
Goals: Develop and implement appropriate BMPs at street and road repair and/or maintenance sites to control debris and waste materials during road and parking lot installation repaving or repair maintenance activities, such as those described in the CASQA Handbook for Municipal Operations.									
Actions –									
a.1. Implement existing/modified Street and Road Repair and Maintenance BMPs		X						Ongoing	a.ii.(1)&(2)
a.3. Report on implementation of and compliance with street and road repair and maintenance BMPs in each Annual Report.	A	X						9/15/2015	a.iii.
C.2.b. Sidewalk/Plaza Maintenance and Pavement Washing									
Goal: Implement, and require to be implemented, BMPs for pavement washing, mobile cleaning, pressure wash operations in such locations as parking lots and garages, trash areas, gas station fueling areas, and sidewalk and plaza cleaning, which prohibit the discharge of polluted wash water and non-stormwater to storm drains.									
Actions –									
b.1. Implement existing/modified Sidewalk/Plaza Maintenance and Pavement Washing BMPs.		X						Ongoing	b.i.
b.4. Report implementation and compliance with these BMPs in the Annual Report.	A	X						9/15/2015	b.ii.
C.2.c. Bridge and Structure Maintenance and Graffiti Removal									
Goal: Implement appropriate BMPs to prevent polluted stormwater and non-stormwater discharges from bridges and structural maintenance activities directly over water or into storm drains. Implement BMPs for graffiti removal that prevent non-stormwater and wash water discharges into storm drains.									
Actions –									
c.1. Implement existing/modified Bridge Structure Maintenance and Graffiti Removal BMPs.		X						Ongoing	c.ii.(1)(2)(3)
c.3. Report implementation and compliance with these BMPs in the Annual Report.	A	X						9/15/2015	c.iii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.2

Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.2.d. Stormwater Pump Stations									
Goal: Prevent the discharge of water with low dissolved oxygen (DO) from pump stations, and explore the use of pump stations for trash capture and removal to protect beneficial uses of receiving waters.									
Actions –									
d.5. Inspect and collect DO data from applicable pump stations.		X						Ongoing since July 2010	d.ii.(2)
d.6. Implement appropriate management actions, as required, at pump stations whose discharges have DO levels at or below 3 mg/l.		X						Ongoing	d.ii.(3)
d.9. Maintain records of inspection, maintenance and implementation of corrective actions. Submit to WB upon request.	A	X						Ongoing	d.iii.
C.2.e. Rural Public Works Construction and Maintenance									
Goal: Implement BMPs for erosion and sediment control during and after construction or maintenance activities on rural roads, particularly adjacent to or within stream channels or wetlands. Provide training to rural roads maintenance staff at least twice within the permit term.									
Actions –									
e.1. Implement existing/modified Rural Public Works BMPs.		X						Ongoing	e.ii.(1) & (2)
e.4. Provide training to public works maintenance staff at least twice within Permit term (need for training in FY 15-16 to be determined).	A	X						Twice during the Permit term (dates TBD) . Previous trainings 10/3- 4/2011 and 11/3-4/2013.	e.ii.(4)
e.5. Report implementation and compliance with BMPs, including reporting on increased maintenance in priority areas, in the Annual Report.	A	X						9/15/2015	e.iii.

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Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.2.f. Corporation Yard BMP Implementation									
Goal: Develop and implement site specific Stormwater Pollution Prevention Plans (SWPPPs) for corporation yards.									
Actions –									
f.1. Continue to assist with corporation yard BMPs and SWPPPs.	A							Ongoing as needed	f.ii.
f.2. Conduct inspections of each corporation yard annually, between September 1 and September 30.		X						Annually, Sept	f.ii.(2)
f.3. Report results of inspections and any follow-up actions in the Annual Report.		X						9/15/2015	
C.2.g. General Assistance									
Goal: Provide general assistance and guidance for implementing Provision C.2.									
Actions-									
g.1 Continue to provide guidance on BMP implementation, monitoring, data management, and reporting. Administer and participate in the Municipal Maintenance AHTG.	X							Ongoing as needed	a.,b.,c.,e.

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SECTION 3

NEW DEVELOPMENT AND REDEVELOPMENT (C.3)

Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.3.a. New Development and Redevelopment Performance Standard Implementation									
Goals: Update current legal authority, development review and permitting, environmental review, training, and outreach to address new C.3. requirements, and continue to implement. Encourage all projects not regulated by Provision C.3., but that are subject to the Permittees' planning, building, development, or other comparable review, to include adequate source control and site design measures.									
Actions –									
a.3. Continue to evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as under CEQA.		X						Completed 12/1/2009; ongoing	a.i.3
a.4. Conduct/attend Annual C.3. Workshop to train staff on C.3. requirements.	X	X						Annually	a.i.4
a.5. Provide training/assistance to internal department staff on C.3. requirements as appropriate	A	X						As needed	a.i.4
a.9.1. Continue updates to the C.3 Handbook and other guidance, based on experience with implementation of LID requirements, and updates to outreach flyers as needed.	X	A						Ongoing; Update completed April 2012; Completed additional updates in April 2015	a.iii.
a.10 Conduct a workshop or focus part of the Annual C.3 workshop on C.3 requirements and design of LID site measures for development community.	X	A						TBD	

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Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.3.b. Regulated Projects									
Goal: Implement requirements for different categories of new development or redevelopment projects regulated under C.3.									
Actions –									
b.3.1 Participate in and chair the BASMAA Development Committee (assume 12 meetings during FY 15-16) to oversee development of regional MRP products and share information about C.3 implementation strategies and experience.	X	X	A					Ongoing as needed	b.iii.
b.3.2 Provide staff support to Co-permittee development of local GI plans and implementation of GI projects, including development of scoping plan as guidance for development of GI plans; providing model documents and examples; conducting educational/outreach meetings for Co-permittee department staff; and developing standard specifications. A work plan for this task will be developed and forwarded to the BATG and C.3 AHTGs prior to initiating.	X	X	A					6/30/16 (schedule TBD)	b.iii.
b.4 Provide staff support to Co-permittee implementation of local green streets projects. Task includes participation in the Prop 84-funded GreenPlan Bay Area Technical Advisory Committee (assume 2 meetings during FY 15-16) and assistance as needed to facilitate application of the GIS tool GreenPlan-IT to two watersheds in Santa Clara County. Program staff time represents part of the in-kind match for SCVURPPP/San Jose.	X	X						Ongoing as needed	b.v.1 and 2
b.4.1 Participate in BASMAA discussions of regional guidelines and funding issues for green streets projects, and review regional products and reports on behalf of SCVURPPP. Manage and represent SCVURPPP at the MRP 2.0 Steering Committee's Green Infrastructure (GI) Work Group and other regional GI meetings (assume 8 meetings during FY 15-16).								Ongoing as needed	
b.5.1 Continue to provide guidance and assistance with annual reporting of C.3. information.	A	X						Annually (9/15/2015)	b.v.1

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Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
b.6. Continue to assist Co-permittees with implementation of C.3 and LID on projects, including assistance with questions on specific projects and LID applicability and feasibility criteria, and other technical support and presentations. Continue to assist with the C3PO AHTG and work group meetings and action items.	X							Ongoing	b.i. & ii.
C.3.c. Low Impact Development									
Goal: Reduce runoff and mimic a site's predevelopment hydrology by minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, and/or biotreating stormwater close to its source. Develop guidance, criteria, procedures and specifications for implementing the new LID requirements.									
Actions –									
c.1. Require all Regulated Projects to treat 100% of C.3.d. runoff with LID measures, onsite or at a joint treatment facility, unless infeasibility is demonstrated.		X						Ongoing beginning 12/1/2011 (12/1/2012 for public projects)	c.i.2.b.
C.3.d. Numeric Sizing Criteria for Stormwater Treatment Systems									
Goal: To ensure that stormwater treatment systems constructed for Regulated Projects meet the appropriate hydraulic sizing criteria.									
Actions –									
d.1. Continue using the numeric sizing criteria for Regulated Projects.	A	X						12/1/2009, ongoing	d.i.
d.2. Continue implementing guidelines on using infiltration devices.	A	X						12/1/2009, ongoing	d.iv.

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Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.3.e. Alternative Compliance									
Goal: To allow a Regulated Project to treat a portion of runoff with LID measures at an offsite project in the same watershed or pay an in-lieu fee to a regional project.									
Actions –									
e.2. Apply LID Treatment Reduction Credit to Special Projects as needed.	A	X						12/1/2011; Ongoing	C.3.e.ii
e.4. Track and report Special Projects to the Water Board on March 15 and September 15 of each year.	A	X						9/15/2015	c.3.e.vi.
C.3.f. Alternative Certification of Stormwater Treatment Systems									
Goal: Allow a qualified third party reviewer to certify the adequacy of design of stormwater treatment measures (per C.3.d. and f.).									
Actions –									
C.3.g. Hydromodification Management (HM)									
Goal: Implement final HM requirements on applicable Regulated Projects, to protect receiving streams from increase in runoff peak flows, volumes and durations.									
Actions –									
g.2. Implement new HM requirements at applicable Regulated Projects. Program staff provide guidance on implementation of HM requirements, including use of the Bay Area Hydrology Model to size HM facilities.	A	X						Ongoing since 12/1/2009	g.i.
g.3. Report information on approved HM Projects per C.3.b.v. and C.3.g.iv.	A	X						Annually since 9/15/10	g.iv.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.3

Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.3.h. Operation and Maintenance of Stormwater Treatment Systems									
Goal: Implement an Operation and Maintenance (O&M) Verification Program to ensure the proper O&M of installed treatment control BMPs.									
Actions –									
h.1. Continue to implement a BMP O&M Verification Program. Program staff continue to assist with implementation of BMP O&M verification programs.	A	X						Ongoing	h.i.
h.3. Provide the list of newly installed stormwater treatment systems and HM controls to the County Vector Control District and Water Board by October 1 of each year.	X	A						Annually (10/1/2015)	h.ii., h.iv.
h.6. Continue to maintain and update a database of Regulated Projects that have installed stormwater treatment systems and HM controls.	A	X						Ongoing since 2003	h.ii.
h.10. Provide training for O&M inspectors and landscape maintenance staff and facility managers, as part of the C.3 or construction workshops.	X	A						Spring/Summer 2015	h.ii.
h.11 Provide updated guidance on O&M for LID treatment measures as needed.	X	A						Ongoing	h.ii
C.3.i. Required Site Design Measures for Small Projects and Detached Single-Family Home Projects									
Goal: Require small projects to implement LID site design measures.									
Actions –									
i.4 Require development project applicants to implement requirements for site design measures for single family homes and small projects, and update outreach materials and other resources (such as standard specifications) as needed.	A	X						Ongoing since Dec 2012	C.3.i

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.3



SECTION 4

INDUSTRIAL AND COMMERCIAL SITE CONTROL

Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.4.a. Legal Authority for Effective Site Management									
Goals: Establish sufficient legal enforcement authority to obtain effective stormwater pollutant control on industrial sites.									
Actions –									
a.1. Implement existing/revised legal authority.		X						Ongoing	a.i
C.4.b. Industrial and Commercial Business Inspection Plan (Inspection Plan)									
Goal: Develop and implement an inspection plan that will serve as a prioritized inspection work plan.									
Actions –									
b.1. Update and maintain a list of industrial and commercial facilities that could cause or contribute to pollution of stormwater runoff.	A	X						Annually	b.ii
b.2. Review existing inspection plans and update annually to include list of facilities to be inspected, priorities, mechanism to include newly opened businesses, and frequency of inspections.	A	X						Annually	b.ii
b.3. Implement current/revised inspection plans as appropriate.		X						Ongoing	b.ii
b.3.1. For each facility identified, maintain a database with the address, description of activity or pollutant source, inspection priority, frequency, and coverage under General Permit.	A	X						Ongoing	b.ii
b.4 Report list of all industrial and commercial facilities requiring inspections	A	X						9/15/2015	b.iii
b.5 Continue identifying PCBs and PCB-containing equipment during inspections.		X						Ongoing	C.12.a.iii
C.4.c. Enforcement Response Plan (ERP)									
Goal: Have an ERP that will serve as a reference document for inspection staff to take consistent actions to achieve timely and effective compliance from commercial and industrial site operators.									
Actions –									
c.3. Maintain adequate records to demonstrate compliance and appropriate follow-up enforcement responses for facilities inspected per the ERP.	A	X						Ongoing	c.ii.(4)

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.4

Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
c.4 As needed and directed, modify and maintain database developed by the Program and used by individual Co-permittees.	X	A						Completed 4/1/2010, Ongoing as needed	
c.5. Report summary of inspection activities in Annual Report.	A	X						9/15/2015	c.iii
C.4.d. Inspections									
Goal: Conduct inspections according to Inspection Plan and ERP									
Actions-									
d.1 Conduct inspections to observe; 1) appropriate BMPs, 2) evidence of unauthorized discharges, illicit connections, and potential discharges to stormwater, 3) noncompliance with Permittee ordinances, and 4) verification of coverage under Industrial General Permit	A	X						Ongoing	d.ii
d.2 Maintain adequate records of inspections	A	X						Ongoing	d.ii
d.3. Submit inspection data and results in the Annual Report each year.	A	X						9/15/2016	d.iii
C.4.e. Staff Training									
Goal: Provide focused training for inspectors annually, as required by the MRP									
Actions –									
d.1. Annually provide inspectors with focused training.	X	A						<i>Annually</i>	d.ii
d.2. Include training dates, training topics and percentage of inspectors attending the training in the Annual Report	A	X						9/15/2015	d.iii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.4



SECTION 5

ILLICIT DISCHARGE DETECTION AND ELIMINATION

Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.5.a. Legal Authority									
Goals: Establish sufficient legal enforcement authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve compliance.									
Actions –									
a.1. Implement current/revised legal authority.		X						Ongoing	a.ii.
C.5.b. Enforcement Response Plan (ERP)									
Goal: Have an ERP that will serve as a reference document for inspection staff to take consistent actions to achieve timely and effective abatement of illicit discharges.									
Actions – No actions for FY 14-15; all actions completed in FY 09-10.									
C.5.c. Spill and Dumping Response, Complaint Response, and Frequency of Inspections									
Goal: Provide a central contact point for Permittee staff and the public for spill and dumping complaints and response. At a minimum, the central contract point shall include a phone number. As feasible, a user friendly web reporting form should be included.									
Actions –									
c.1. Have a central contact point including a phone number for complaints and spill reporting, and publicize this number to both internal Permittee staff and the public	A	X						Completed 7/1/2010	c.i
c.1.1 Update Permittee website with central contact point to report spills and dumping.		X						Complete by 6/30/16	c.ii
c.2. Complete and maintain spill/dumping response flow chart and phone tree or contact list for internal use that shows the various responsible agencies and their contacts, including who would be involved in illicit discharge incident response that goes beyond the Permittees immediate capabilities.	A	X						Ongoing, Completed 7/1/2010	c.1, c.ii
c.3. Submit: 1) spill and dumping phone number and, if used, web address 2) screen shot of Permittee's website showing central contact point, and 3) discussion of how the phone number and if used, web address is being publicized.	A	X						9/15/2016 and 9/15/2019	c.iii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.5

Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.5.d Control of Mobile Sources									
Goal: Establish oversight and control of pollutants associated with mobile business sources									
Actions –									
d.4 Use an outreach and education strategy (e.g. distrubtion of education materials) for outreach to mobile businesses operating within the Permittee's jurisdiction.	A	X						Ongoing	d.ii.(c)
d.5 Inspect mobile businesses as needed, on a complaint basis or as part of the commercial facility inspection plan.		X						Ongoing	d.ii.(d)
d.6. Cooperate regionally in implementing programs for mobile businesses, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education, coordinating with BASMAA as appropriate.	A	A	X					Ongoing	d.ii.2.
d.7. Report implementation of minimum standards and BMPs for mobile businesses and their enforcement strategy in each Annual Report.	A	X						9/15/2015	d.iii.
C.5.e. Municipal Separate Storm Sewer System (MS4) Map Availability									
Goal: Make the maps of MS4 available									
Actions –									
e.1 Make maps of MS4 publicly available, either electronically or in hard copy, through a single point of contact.	A	X						Completed 7/1/2010	f.ii
e.1.1 Publicize availability of MS4 map through directories and websites	A	X						Ongoing	f.ii
e.2. Discuss how maps are made available to the public and how they are publicized (in 2016 and 2019 Annual Reports	A	X						9/15/16 and 9/15/19	f.iii.

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Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.5.f. Tracking and Case Follow-up									
Goal: To log and track follow-up, response to, and resolution of discharges reported to the complaint/spill system									
Actions –									
f.1 Provide template Excel tabular system and update database, as directed.	X	A						Completed FY 09-10	
f.2. Create and maintain water quality spill and discharge complaint tracking and follow-up information in an electronic database or equivalent tabular system. Update Program database as needed.	A	X						Completed 4/1/2010; ongoing maintenance as needed	f.ii.
f.3. Report relevant data (as required Provision C.5.d.iii) in each Annual Report.	A	X						9/15/2015	f.iii.
C.5.g. Staff Training									
Goal: Provide focused training for inspectors annually (Note: Annual training not required in MRP but identified as need by Co-permittees)									
Actions –									
g.1. Annually provide staff with focused training. Combine training with Industrial Inspector training.	X	A						Annually	

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SECTION 6

CONSTRUCTION SITE CONTROL

Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.6.a. Legal Authority for Effective Site Management									
Goals: Have adequate legal authority to address new C.6. requirements, and continue to implement.									
Actions – no actions for FY 15-16; all actions completed .									
C.6.b. Enforcement Response Plan (ERP)									
Goal: Have an Enforcement Response Plan (ERP) that will serve as a reference document for inspection staff to take consistent actions to achieve timely and effective compliance.									
b.1. Revisions / updates, as needed, to ERP based on Regional Board comments or changes in co-permittee procedures.	A	X						Ongoing, as needed	b.ii.
C.6.c. Best Management Practices Categories									
Goal: Require all construction sites to have specific, and seasonally- and phase-appropriate, effective BMPs in 6 categories: 1) erosion control, 2) run-on and run-off control, 3) sediment control, 4) active treatment systems (as needed), 5) good site management and 6) non-stormwater management.									
Actions –									
c.1. Provide outreach pieces on six BMP categories and other outreach as needed, working collaboratively with BASMAA.	A	A	X					Ongoing, as needed	c.ii.
C.6.d. Plan Approval Process									
Goal: Have adequate development review and permitting procedures to address new C.6 requirements including review of erosion control plans for consistency with local requirements, appropriateness and adequacy of proposed BMPs for each site before issuance of grading permits.									
Actions –									
d.3. Provide educational materials to site operators and developers.		X						Ongoing	d.ii.3

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.6

Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.6.e. Inspections									
Goal: Implement a construction site inspection program to ensure compliance with local ordinances and effectiveness of BMPs.									
Actions –									
e.1. Notify all site developers and/or owners disturbing one acre or more of soil to prepare for the upcoming wet season.		X						Ongoing, 9/1/2015	e.ii.1
e.3. Conduct monthly inspections during the wet season for sites disturbing one acre or more of land, hillside projects, and high priority sites.		X						Annually during wet season	e.ii.2
e.8. Track all inspections in an electronic database or tabular format.		X						Begin 12/1/2009, ongoing	e.ii.4
e.9. Summarize inspection information in Annual Reports	A	X						9/15/2015	e.iii
e.11. Continue to assist Co-permittees with inspection and enforcement issues, data collection efforts, data management, and reporting, as needed.	X	A						Ongoing	e.ii.& e.iii
C.6.f. Staff Training									
Goal: Provide training or access to training for staff conducting construction site stormwater inspections. The MRP requires training at least every other year.									
Actions –									
f.1. Provide training to construction inspectors and internal department staff on C.6 requirements as appropriate.	X	X						Annually	f.ii
f.2. Report on training topics covered, dates of training, and the percentage of inspectors attending each training in each Annual Report.	A	X						9/15/2015	f.iii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.6



SECTION 7

PUBLIC INFORMATION AND OUTREACH

Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.7.a. Storm Drain Inlet Marking									
Goals: To mark, inspect and maintain at least 80% of municipally-maintained storm drain inlets with no dumping message or equivalent once per 5-year permit cycle, and to require inlet marking by project developers of newly approved, privately maintained streets.									
Actions –									
a.1. Mark, inspect and/or maintain markings of at least 80 percent of municipality-maintained storm drain inlets to ensure they are legibly labeled with a no dumping message or equivalent, once per permit term.		X						Ongoing	a.ii
a.2. For newly developed, privately maintained streets, require inlet marking by the project developer upon construction and maintenance of markings through the development maintenance entity. Verify markings prior to acceptance of the project.		X						Ongoing	a.i.
C.7.b. Advertising Campaigns									
Goal: Participate in or contribute to advertising campaigns on trash/litter in waterways and pesticides with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target audience.									
Actions –									
b.1. Continue to implement the Watershed Watch Campaign to raise awareness about stormwater pollution prevention, trash in waterways, and reducing the impact of urban pesticides. Program staff will work with AdManor (Watershed Watch Campaign consultant) to implement the Campaign.	X	A						Ongoing	b.i.
b.1.1. Continue to provide funding for a regional advertising campaign on litter, such as the Be the Street Campaign or the City of San Jose's outreach campaign with the Earthquakes Soccer Team.	A	X	X					Ongoing	b.i

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.7

Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.7.c. Media Relations – Use of Free Media									
Goal: Participate in or contribute to a media relations campaign. Maximize use of free media/media coverage with the objective of significantly increasing overall awareness of stormwater pollution prevention messages and associated behavior change in target audiences, and to achieve public goals.									
Actions –									
c.1. Participate in the BASMAA Media Relations Campaign to conduct a minimum of six pitches per year at the county-wide program, regional, and/or local levels. Local media relations will be conducted as needed through Watershed Watch Campaign implementation.	A	A	X					Ongoing	c.i., c.ii.
c.2. Report on the details of each media pitch, such as the media, date, and content of the pitch conducted each year.	X		X					9/15/2015	c.iii.
C.7.d. Stormwater Point of Contact									
Goal: Create and maintain a point of contact (phone number or website) to provide the public with information on watershed characteristics and stormwater pollution prevention alternatives									
Actions –									
d.1. Continue to maintain and publicize the Watershed Watch website (maintained by AdManor with input from Program staff) and the SCVURPPP and Watershed Watch hotlines (maintained by Program staff).	X	A						Ongoing	d.i., ii.
d.2. Continue to maintain and publicize Co-permittee phone numbers for reporting illegal dumping.	A	X						Ongoing	d.i., ii.
d.3. Continue to maintain and publicize the BASMAA Baywise website.	A	A	X					Ongoing	
C.7.e. Public Outreach Events									
Goal: Participate in and/or host events (e.g., community events, street fairs and farmers markets) to reach a broad spectrum of the community with both general and specific stormwater runoff pollution prevention messages.									
Actions –									
e.1. The Program will annually participate in 8 outreach events and collect data on participation. Co-permittees and AdManor will help with staffing. Co-permittee may conduct additional outreach events locally.	X	X						Ongoing	e.i., ii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.7

Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
e.2. Develop and print brochures and other outreach materials as needed. Coordinate with Admanor as needed.	X	A						As needed	
e.3. In the Annual Report, provide details of each outreach event, data on participation, and assess the effectiveness of efforts.	X	X						9/15/2015	e.iii.
C.7.f. Watershed Stewardship Collaborative Efforts									
Goal: Support watershed stewardship collaborative efforts of community groups (e.g., the Santa Clara Basin Watershed Management Initiative, and "friends of creek" groups). Coordinate with existing groups to further stewardship efforts.									
Actions –									
f.1. Program will continue to participate in and support WMI activities including Steering Committee, Zero Litter Initiative, Land Use Subgroup and Product Action Subgroup. Co-permittees may continue to participate in and/or support the WMI and/or support other local creek groups or watershed councils.	X	A						Ongoing	f.i., ii.
f.1.1. Participate in and Chair the Land Use Subgroup if activated. Develop outreach pieces as needed and assist in implementing the Annual C.3. Workshop.	X	A						Ongoing	
f.1.1 Host and maintain WMI website.	X	A						Beginning 7/1/15, Ongoing	f.i., ii.
f.2. In each Annual Report, provide the level of effort, describe support given, activities implemented and evaluation of effectiveness.	X							9/15/2015	f.iii.
C.7.g. Citizen Involvement Events									
Goal: Individually or collectively support citizen involvement events, as required by C.7.g.ii., Table 7.2, which provide the opportunity for citizens to directly participate in water quality and aquatic habitat improvement, such as clean-up events, volunteer monitoring, community grants, etc.									
Actions –									
g.1. Program will continue to support creek cleanups by providing funding to advertise the 2015 National River Clean-up Day. The Program will also support programs at Alviso Education Center by continuing to fund a full-time interpretive specialist position at the Alviso Education Center to conduct the Watershed Watchers Program. Co-permittees may conduct additional activities locally.	X	X						Ongoing	g.i., ii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.7

Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
g.2. In each Annual Report, provide details of each citizen involvement event and evaluate the effectiveness of outreach.	X	X						9/15/2015	g.iii.
C.7.h. School-Age Children Outreach									
Goal: Implement outreach activities designed to change specific behaviors and/or increase awareness in school-age children (K through 12), with the objective of significantly increasing their overall awareness of stormwater and/or watershed message(s) and to cause behavior change(s).									
Actions –									
h.1. Continue to sponsor ZunZun school assemblies at elementary schools in Santa Clara Valley, and assess effectiveness of efforts.	X	A						Ongoing	h.i., ii.
h.2. Conduct outreach to school-age children through the Watershed Watchers Program at the Alviso Education Center and other local (Co-permittee) outreach programs, and assess effectiveness of efforts.	X	X						Ongoing	h.i., ii.
h.3. In each Annual Report, provide the level of effort, spectrum of children reached, methods used and effectiveness evaluation.	X	X						9/15/2015	h.iii.
C.7.i. Outreach to Municipal Officials									
Goal: To conduct outreach to municipal officials and increase overall awareness of stormwater and/or watershed message(s) among regional municipal officials.									
Actions –									
i.1. Make presentations to City/County managers, public works and planning officials, at least once per permit cycle, and assist Co-permittees with outreach materials as needed.	X	X						Ongoing	i.i.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.7



SECTION 8

WATER QUALITY MONITORING

Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.8.a. Compliance Options									
Goals: Define Monitoring Collaborative through a Regional Monitoring Collaborative (RMC) Work Plan; provide documentation to Water Board by July 1, 2010 confirming whether monitoring will be conducted individually or through monitoring collaborative; develop the tools necessary to effectively conduct creek status monitoring (per MRP requirements) and insure data quality; and, manage all aspects of water quality monitoring required by the MRP.									
Actions –									
a.9 Manage all aspects of SCVURPPP water quality monitoring required by Provision C.8 of the MRP	X							Ongoing	all
a.10 Continue participating in the BASMAA Regional Monitoring Coalition (RMC) on behalf of the Program including active participation and leadership in RMC workgroup meetings, review and comments on RMC products, and managing review of RMC products by Co-permittees	X	A						Ongoing	all
C.8.b. SF Bay Monitoring RMP									
Goal: Financially contribute to and participate in the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP).									
Actions –									
b.1 Financially contribute to the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP)	X							Annually	b.
b.2. On behalf of BASMAA, participate in RMP steering and technical review committees, and workgroups	X		X					Ongoing	b.
C.8.c. Creeks Status Monitoring									
Goal: Conduct creek status monitoring (per MRP requirements), including field work, sample collection and processing, and laboratory analyses in coordination with other participants of the BASMAA Regional Monitoring Coalition (RMC).									
Actions –									
c.6. Prepare for creek status monitoring, including equipment and field supply preparation, site reconnaissance, and final site selection.	X	A						Ongoing	c.ii
c.7. Conduct wet weather water toxicity monitoring.	X							Winter FY 15-16	c.ii
c.8. Conduct biological assessments, monitor chlorine, continuous general water quality (sondes), bedded sediment toxicity and pollutants, CRAM, and water column toxicity monitoring.	X	A						Spring/ Summer 2016	c.ii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.8

Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.8.d. Monitoring Projects									
Goal: Conduct monitoring projects: stressor/source identification, BMP effectiveness investigation, Geomorphic project.									
Actions –									
d.7 Continue conducting a follow-up/investigative monitoring project in Upper Penitencia creek to determine the potential causes of biological conditions observed via creek status monitoring.	X	A						Ongoing	d.i
C.8.e. Pollutants of Concern & Long-Term Trends Monitoring									
Goal: Assess inputs of Pollutants of Concern to the Bay from local tributaries and urban runoff, assess progress toward achieving wasteload allocations for TMDLs and help resolve uncertainties associated with loading estimates for these pollutants.									
Actions –									
e. 1 - Small Tributaries Loading:									
vii. Continue conducting POC monitoring at Guadalupe River and Pulgas Creek pumpstation (San Mateo County) stations at a level equal to approximately 33% of the overall regional costs associated with POC loads monitoring, using methodologies and sites described in the BASMAA RMC Multi-Year Plan.	X		X					Ongoing, began October 2012	e.i
e.2 - Long-Term Trends Monitoring:									
i. Track implementation of SWAMP's Statewide Pollutant Trends (SPoT) program to ensure compliance with MRP provision C.8.e. Prepare alternative strategy should SWAMP monitoring not sufficiently comply with MRP requirements.	X		X					Ongoing	e.ii
C.8.f. Citizen Monitoring									
Goal: Encourage citizen monitoring and incorporate applicable stakeholder information and comments into data analyses and reporting.									
Actions –									
f.1. Encourage Citizen Monitoring through coordination with existing monitoring groups (e.g., Stevens-Permanente Watershed Council).	X	X						Ongoing	f.i
f.2. Make monitoring plans and reports available to citizens and stakeholders for comment.	X							Ongoing	f.ii
f.3. Provide technical support to the Stevens-Permanente Watershed Council's Volunteer Monitoring and Assessment Program.	X	A						Ongoing	f.i

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.8

Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.8.g. Reporting									
Goal: Report on monitoring activities, results, conclusions and next steps consistent with MRP requirements.									
Actions –									
g.2. Develop and submit electronic creek status monitoring data to Water Board.	X							1/15/2016	
g.3. Develop and submit Urban Creeks Monitoring Report to Water Board.	X	A	X					3/15/2016	
C.8.h. Monitoring Protocols and Data Quality									
Goal: Coordinate and manage the programs quality assurance program and data management system for all Program-collected monitoring data									
Actions –									
h.1. Enter collected creek status monitoring data collected into the Program's information management system	X							Ongoing	
h.2. Conduct quality assurance procedures on creek status monitoring data.	X							Ongoing	
h.3. Manage POC Monitoring Subcontractor (SFEI) on data quality assurance procedures and information management	X		X					Ongoing	

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.8



SECTION 9

PESTICIDES TOXICITY CONTROL

Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.9.a. Maintain and Implement IPM Policy or Ordinance and Standard Operating Procedures									
Goal: To maintain an IPM Policy or Ordinance and written standard operating procedures (SOPs) for pesticide use that ensure implementation of the IPM policy or ordinance and require municipal employees and contractors to adhere to the IPM standard operating procedures.									
Actions –									
a.1. Require municipal employees and contractors to adhere to the IPM Policy/Ordinance and standard operating procedures.		X						Ongoing	a.i
a.2 Annually, Permitteess shall certify that they are implementingto the IPM Policy/Ordinance and standard operating procedures.	A	X						9/15/2016	a.iii (1)
a.3. Report on IPM implementation by showing trends in quantities and types of pesticide used, and suggest reasons for increases in use of pesticides that threaten water quality.	A	X						9/15/2015	b.ii.(1)
a.3. Annually, provide brief description of a minimum of three IPM actions implemented in the reporting yar, focusing to the extent possible on new or enhanced actions taken	A	X						9/15/2016	b.ii(2)
a.4. Maintain pesticide application standard operating procedures and submit upon request..		X						Ongoing	b.ii.(3)
C.9.b. Training of Municipal Employees									
Goal: To ensure that all municipal employees who, within the scope of their duties, apply or use pesticides that threaten water quality are trained in IPM practices and the Permittee’s IPM policy. Training frequency not explicit in MRP, but annual training recommended.									
Actions –									
b.1. Ensure that all municipal employees who, within the scope of their duties, apply or use pesticides that threaten water quality are trained in IPM practices and the Permittee’s IPM policy, receive annual training.	A	X						Ongoing	b.i
b.2. Annually, report on the percentage of municipal employees who apply pesticides and have received training in IPM Policy/SOPs within the last year	A	X						9/15/2015	b.ii.(1)
b.3 In the Annual Report, briefly describe the type of training (tailgate, external agency etc.)	A	X						9/15/2016	b.ii. (1)

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.9

Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
c.3. Compile training materials (e.g., course outline, date, attendees) for submittal to Water Board upon request.	A	X						As needed	c.ii.(2)
C.9.c. Require Contractors to Implement IPM									
Goal: To hire IPM-certified contractors and include contract specifications requiring contractors to implement IPM no later than July 1, 2010.									
Actions –									
c.1. Hire IPM-certified contractors or include contract specifications requiring contractors to implement IPM. Include evidence of compliance in each annual report.	A	X						Ongoing, starting FY 15-16	c.i
c.2. Provide guidance on potential future MRP requirements for Permittees to "observe contractor activities to verify full implementation of IPM techniques, or at a minimum, evaluate the lists of pesticides and amounts of active ingredients use."	A	X						Ongoing, starting FY 15-16	c.ii.
c.3 Provide guidance on potential future MRP requirements regarding Permittees "stating how contractor compliance with IPM policies was verified and any actions taken or needed to correct contractor performance."	X	A						9/15/2016	c.iii
C.9.d. Interface with County Agriculture Officials									
Goal: To maintain regular communications with county agricultural commissioners (or other appropriate State and/or local agencies) to get input and assistance on urban pest management practices and use of pesticides and use of pesticides; inform them of water quality issues related to pesticides; report violations of pesticides regulations (e.g., illegal handling) associated with stormwater management.									
Actions –									
d.1. Maintain communication with County Agricultural Commissioner's office to inform them of water quality issues related to pesticides and obtain their input and assistance on urban pest management practices and use of pesticides.	X	A						Ongoing	d.i
d.2. Report any violations of pesticide regulations (e.g., illegal handling) associated with stormwater management to the Ag. Commissioner.	A	X						Ongoing	d.ii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.9

Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
d.3.Report on improper pesticide usage reported to County Ag. Commissioner and follow-up actions to correct violations.	A	X						9/15/2015	d.ii
d.3. In the Annual Report, briefly describe each of the three types of communications with County Ag. Commissioner and follow-up actions to correct violations.	A	X						9/15/2016	d.ii
C.9.e. Track and Participate in Relevant Regulatory Processes									
Goal: Track and participate in relevant regulatory processes (may be done jointly with other Permittees, such as through CASQA or BASMAA and/or the Urban Pesticide Pollution Prevention project).									
Actions –									
e.1. Participate in CASQA Pesticides Subcommittee meetings, develop response letters to proposed regulations (as needed), participate in UP3.	X	A						Ongoing	e.
e.2. Report participation in relevant regulatory processes and list information submitted. Participation may be an individual or regional effort.	X	A						9/15/2015	e.ii
C.9.g. Evaluate Implementation of Source Control Actions Relating to Pesticides									
Goal: Evaluate the effectiveness of control measures implemented, attainment of TMDL targets, and identify improvements needed.									
Actions –									
No actions in FY 15-16 (all completed in FY 13-14)									

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.9

Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.9.e. Public Outreach									
Goal: To develop and implement public outreach related to reducing pesticide use and encouraging private landscare irrigation management that minimizes pesticide runoff.									
Actions –									
e.1. Conduct outreach to consumers at the point of purchase; provide targeted information on proper pesticide use and disposal, potential adverse impacts on water quality, and less toxic methods of pest prevention and control; and participate in and provide resources for the “Our Water, Our World” program or a functionally equivalent pesticide use reduction outreach program. Provide feedback on the regional OWOW Program.	X	A	A					Ongoing	e.ii (1)
e.2. In the Annual Report, provide a reference to the OWOW report that summarizes regional point-of-purchase outreach actions.	X	X	A					9/15/2015	e.iii
e.3. Conduct outreach to residents who use or contract for structural pest control. Provide tips for hiring structural pest control.	X	X	A					Ongoing	e.ii (2)
e.4 In the Annual Report, describe outreach to residents who contract for structural pest control or provide a reference to a report that summarizes this effort	X		A						e.iii
e.5 Continue to support the Santa Clara Countywide Eco-Gardens Program through Work Group meetings and provide content for the Eco-Gardener website, as needed. Budget for this task is available under Provision C.7 budget.	X	A						Ongoing	
e..6. Work with DPR, county agricultural commissioners, UC-IPM, BASMAA, Urban Pesticide Committee, EcoWise Certified Program (or other functionally equivalent certification program), Bio-integral Resource Center and/or others to promote IPM and IPM certification programs to pest control professionals	X	A	X					Ongoing	e. ii (3)

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.9

Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
e.7. Continue to support the Green Gardener Training Program for professional landscape workers focused on integrated pest management and techniques that protect water quality	X	A						<i>Ongoing</i>	e. ii (3)
e.8. In each Annual Report, describe regional participation and reference a report that summarizes outreach to pest control operators (PCOs) and landscapers and/or describe local PCO outreach efforts.	X	A	A					9/15/2015	e.iii
C.9.f. Track and Participate in Relevant Regulatory Processes									
Goal: Track and participate in relevant regulatory processes (may be done jointly with other Permittees, such as through CASQA or BASMAA and/or the Urban Pesticide Pollution Prevention project).									
Actions –									
f.1. Participate in CASQA Pesticides Subcommittee meetings, develop response letters to proposed regulations (as needed), participate in UP3.	X	A						Ongoing	e.
f.2. Report participation in relevant regulatory processes and list information submitted. Participation may be an individual or regional effort.	X	A						9/15/2015	e.ii
C.9.g. Evaluate Implementation of Source Control Actions Relating to Pesticides									
Goal: Evaluate the effectiveness of control measures implemented, attainment of TMDL targets, and identify improvements needed.									
Actions –									
g.1. Evaluate the effectiveness of source control measures implemented and the attainment of pesticide concentration and toxicity targets for water and sediment from monitoring data. Identify improvements to existing control measures and/or additional control measures, if needed, to attain targets with an implementation time schedule. Summarize findings in FY 18-19 Annual Report	X	A						9/15/2019	g.ii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.9



SECTION 10

TRASH LOAD REDUCTION

Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.10.a. Short-Term Trash Load Reduction									
Goals: To develop and implement a Short-Term Trash Load Reduction Plan, including a baseline loads assessment and load reduction tracking method.									
Actions –									
a.1- Short-Term Trash Loading Reduction Plan:									
No actions in FY 15-16 (all completed in FY 11-12)									a.iii.
a.2. Baseline Loading Estimates:									
No actions in FY 15-16 (all completed in previous FYs)									a.iii.
a.3 - Load Reduction Tracking Method									
v. Provide work plan to the Trash and Budget AHTGs prior to task implementation.	X								a.iii.
vi. Conduct pilot on-land visual assessments in trash management areas within each Permittee's jurisdictional area.	X	A						Ongoing	a.iii.
vii. Develop and maintain a data management system to manage on-land assessment information.	X	A						Ongoing	a.iii.
a.4 - Minimum Trash Full Capture Device Installation									
iii. Identify locations and select types of full capture treatment devices that will be installed.	A	X						Ongoing	a.iii.
vi. Continue managing the database of Full Trash Capture devices to assist with O&M verification inspection reporting and effectiveness analysis.	X							Ongoing	a.iii.
vi. Provide guidance and training in coordination with C.2 - Municipal Operations.	X	A	A					Ongoing	a.iii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.10

Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.10.b. Trash Hot Spot Selection and Cleanup									
Goal: To identify and clean up trash hot spots annually to achieve the multiple benefits of beginning to reduce the trash deposited at these sites and to learn more about the sources and patterns of trash loading.									
Actions –									
b.9. Cleanup Trash at Final Trash Hot Spots to a level of "no visual impact" at least one time per year .		X						Ongoing	b.i.
b.10. Submit trash assessment data to SCVURPPP staff.		X						Ongoing	b.iii.
b.11. Populate FY 14-15 annual report tables with Co-permittee trash assessment data.	X							8/15/2015	b.i.
b.12. Provide on-going management of the hot spot database, compile assessment data and develop summary report.	X	A						Ongoing 9/15/2015	b.iii.
C.10.c. Long-Term Trash Load Reduction									
Goal: To develop a Long-Term Trash Load Reduction Plan and implementation schedule to attain a 70% and 100% Trash Load Reduction									
Actions –									
vi. Provide technical assistance to Co-permittees in implementing long-term trash load reduction plans.	A	X						Ongoing	
C.10.d. Reporting									
Goal: To provide a summary of trash load reduction actions in each Annual Report.									
Actions –									
d.7. Provide updates to trash generation, full capture treatment area, and management area maps and guidance as needed.	X	A						Ongoing	

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.10

Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
Zero Litter Initiative (ZLI)									
Goal: To assist Management Committee in providing coordination as the ZLI defines and implements its work plan.									
Actions –									
1. Provide on-going support to ZLI in developing and implementing work plan tasks.	X	A						Ongoing	

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.10



SECTION 11

MERCURY CONTROLS

Provision C.11 - Mercury Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.11.a. Mercury Collection and Recycling Implemented throughout the Region									
Goals: To promote , facilitate, and/or participate in collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs).									
Actions –									
a.1. See C.12.a									
a.2. Report mercury collection and recycling efforts, including an estimate of the mass of mercury collected using a standard annual reporting format and guidance provided by the Program.	X	X						9/15/2015	a.ii
C.11.b. Monitor Methylmercury									
Goals and Actions –									
See C.8.e.									
C.11.c. Pilot Projects To Investigate and Abate Mercury Sources in Drainages, Including Public Rights-Of-Way, and Stormwater Conveyances with Accumulated Sediment that Contains Elevated Mercury Concentrations.									
Goals and Actions -									
See C.12.c.									
C.11.d. Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices									
Actions -									
See C.12.d.									
C.11.e. Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit									
Goals and Actions -									
See C.12.e.									
C.11.f. Diversion of Dry Weather and First Flush Flows to Publicly Owned Treatment Works (POTWs)									
Goals and Actions -									
See C.12.f.									

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.11

Provision C.11 - Mercury Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.11.g. Monitor Stormwater Mercury Pollutant Loads and Loads Reduced									
Goal: To develop and implement a monitoring program to quantify mercury loads and loads reduced through source control, treatment and other management measures as required by C.8.f.									
Actions –									
C.11.h. Fate and Transport Study of Mercury in Urban Runoff									
Goal: To conduct or cause to be conducted studies aimed at better understanding the fate, transport, and biological uptake of mercury discharged in urban runoff to San Francisco Bay and tidal areas.									
Actions –									
h.5 Through participation in the RMP Contaminant Fate and Transport; Exposure and Effects; and Sources, Pathways and Loadings Work Groups, support RMP Pilot/Special study proposals designed to better understand the fate, transport, and biological uptake of mercury discharged in urban runoff to San Francisco Bay and tidal areas.	A	A	X					Ongoing	
C.11.i. Development of a Risk Reduction Program Implemented Throughout the Region.									
Goal and Actions -									
See C.12.i									
C.11.j. Development of a mercury allocation-sharing scheme									
Goal: To develop an equitable mercury allocation sharing scheme in consultation with CalTrans to address the CalTrans facilities in the program area, and report the details to the Water Board.									
Actions –									
j.3. Continue to track and participate in a regional project to develop a wasteload allocation sharing method with CalTrans.	A	A	X					Ongoing	j.ii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.11



SECTION 12

POLYCHLORINATED BIPHENYLS (PCBs) CONTROLS

Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.12.a. Implement Project throughout Region to Incorporate PCBs and PCB-Containing Equipment Identification into Existing Industrial Inspections									
Goals: Train municipal industrial building inspectors to identify, in the course of their existing inspections, PCBs or PCB-containing equipment. Incorporate PCB identification into industrial inspection programs. Training frequency not explicit in MRP.									
Actions –									
a.3. Incorporate PCB identification into industrial inspection programs.		X						Ongoing	a.i.
a.4. Where inspectors identify PCBs or PCB-containing equipment during inspections, document incident in inspection report and refer to appropriate regulatory agencies (e.g., county health departments, Department of Toxic Substances Control, California Department of Health Services, and the Water Board), as necessary.		X						Ongoing	a.ii.
a.5. Report on on-going training of inspection staff on how to identify PCBs or PCB-containing equipment while conducting industrial facility inspections.		X						9/15/2015	a.iii
C.12.b. Conduct Pilot Projects to Evaluate Managing PCB-Containing Materials and Wastes during Building Demolition and Renovation (e.g., Window Replacement) Activities									
Goal: To evaluate potential presence of PCBs at construction sites, current material handling and disposal regulations/programs (e.g., municipal ordinances, RCRA, TSCA) and current level of implementation, and evaluate effectiveness and feasibility of proposed revisions to demolition materials handling and incorporation of new permitting requirements into existing municipal demolition permitting process.									
Actions –									
b.1. If required by MRP 2.0, assist Permittees in addressing MRP 2.0 requirements associated with implementing controls in buildings demolished/renovated in the Santa Clara Valley that likely contain PCBs.	X	A	X					Ongoing	b.ii.1.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.12

Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.12.c. Pilot Projects to Investigate and Abate On-land Locations with Elevated PCB Concentrations, Including Public Rights-of-way, and Stormwater Conveyances with Accumulated Sediments with Elevated PCBs Concentrations.									
Goal: To investigate PCB sources in or to storm drain systems at five locations and conduct abatement in portions of drainages, in conjunction with Water Board and appropriate agencies.									
Actions –									
c.1. Develop a work plan for review by the POC and Budget AHTGs as anticipated via MRP administrative draft.	X	A						TBD	
c.2 Begin conducting up to three property investigation and abatement projects (similar to the Leo Avenue project) consistent with the MRP 2.0 schedule. Tasks will include beginning the records review and inspection portions of these projects, compiling existing information, and begin developing a PCB referral of the Northrup Grumman property (Sunnyvale) to the Water Board .	X	A						TBD	
C.12.d. Conduct Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices									
Goal: To jointly evaluate ways to enhance PCBs load reduction benefits of operation and maintenance activities that remove or manage sediment. To implement these management practices at a pilot scale in five drainages during this permit term. To document the knowledge and experience gained through pilot implementation. To quantify and report the amount of PCBs loads reduced or avoided resulting from implementation of these measures.									
Actions –									
No tasks are planned for this fiscal year.									
C.12.e. Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit									
Goal: To implement on-site treatment projects at the pilot scale in ten locations during this permit term. To document the knowledge and experience gained through pilot implementation.									
Actions –									
No tasks are planned for this fiscal year.									

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.12

Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.12.f. Diversion of Dry Weather and First Flush Flows to POTWs									
Goal: To implement the pilot diversion of dry weather or first flush stormwater flows from 5 pump stations to POTWs and document the knowledge and experience gained through pilot implementation.									
Actions –									
No tasks are planned for this fiscal year.									
C.12.g. Estimate PCB and Mercury Load Reductions									
Goal: Develop or revise existing PCB and Mercury load reduction accounting method to demonstrate progress toward MRP load reduction milestones and progress towards TMDL waste load allocations.									
Actions –									
g.1. Develop a work plan for review by the POC and Budget AHTGs.	X	A	X					TBD	
g.2. In collaboration with BASMAA partners, begin developing a more robust and refined load reduction assessment methodology to allow for load reduction estimates to be estimated adequately and presented to Water Board staff and other stakeholders. Program staff will review existing methods being used/developed by other Permittees in California, refine the current methods included in IMR, and begin developing guidance, processes, tools and platforms for tracking, managing and reporting PCB and mercury control measure implementation and estimated load reductions.	X	A	X					TBD	
C.12.h. Fate and Transport Study of PCBs in Urban Runoff									
Goal: To conduct or cause to be conducted studies aimed at better understanding the fate, transport and biological uptake of PCBs discharged in urban runoff.									
Actions –									
h.3 Through participation in the RMP Contaminant Fate and Transport; Exposure and Effects; and Sources, Pathways and Loadings Work Groups, support RMP Pilot/Special study proposals designed to better understand the fate, transport, and biological uptake of PCBs discharged in urban runoff to San Francisco Bay and tidal areas.	A		X					Ongoing	h.ii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.12

Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.12.i. Development of a Risk Reduction Program Implemented throughout the Region									
Goal: Develop and implement or participate in effective programs to reduce PCB-related risks to humans and quantify the resulting risk reductions from these activities.									
Actions –									
i.4. Report on progress in Annual Report.	A		X					9/15/2015	i.iii.
i.5. Continue to track and participate in a regional project to manage human health risks from PCBs in Bay fish consumed by humans	X	A	X					Ongoing	i.ii
i.5. Continue to implement the Program’s Work Plan for outreach to residents likely to consume locally-caught fish. Continue working with the Alviso Education Center to utilize various education and outreach products.	X	A						Ongoing	i.ii
C.12.j. Development of a PCB allocation-sharing scheme									
Goal: To develop an equitable mercury/PCB allocation sharing scheme in consultation with CalTrans to address the CalTrans facilities in the program area, and report the details to the Water Board.									
Actions –									
See C.11.j	A	A	X					Ongoing	j.ii
C.12.k. Participate in the Clean Watersheds for a Clean Bay Grant Project									
Goal: Participate and provide match to BASMAA's Clean Watershed for Clean Bay Project									
Actions –									
k.1. Actively participate in BASMAA's Clean Watersheds for a Clean Bay (CW4CB) project funded by the USEPA and intended to assist permittees in complying with Tasks C.12c, C.12.d, C.12e, and C.12i (CW4CB Match)	X	X	X					Ongoing	

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.12

Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.12.l. Leo Avenue Watershed Pilot Implementation Planning and Tracking									
Goal: Identify and as needed, refer PCB source properties and provide follow up assistance to the City of San Jose									
Actions –									
k.1.Coordinate with the City of San Jose and the Water Board on property referrals and other PCB/mercury reduction actions in the Leo Avenue watershed.	X							Ongoing	
C.12.m. Other Old Industrial Area Information Collection and Characterization									
Goal: Provide a more robust understanding of PCB sources and contributions to the Bay impairment.									
Actions –									
No tasks are planned for this fiscal year.									
C.12.n. Moderate Opportunity Area Information Collection and Integration with Green Infrastructure Planning									
Goal: Provide a more robust understanding of PCB sources and contributions to the Bay impairment.									
Actions –									
n.1.Assist Co-permittees in better delineating watershed areas that likely have moderate contributions of PCBs and mercury to stormwater and are likely to undergo significant redevelopment or reconstruction in the near future. Identify these moderate opportunity areas to assist in both the consideration of incorporating pollutant reduction strategies/designs into these redevelopment/retrofit projects and the estimation of pollutant load reduction benefits associated with these projects.	X	A						TBD	

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements.Key: X = Implementation lead. A = assist or develop guidance for implementation.FY 15-16 Work Plan - C.12



SECTION 13

COPPER CONTROLS

Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.13.a. Manage Waste Generated from Cleaning and Treating of Copper Architectural Features, Including Copper Roofs, during Construction and Post-Construction.									
Goals: To establish local ordinance authority to prohibit the discharge of water to storm drains generated from the installation, cleaning, treating, and washing of the surfaces of copper architectural features, including copper roofs.									
Actions –									
a.4. Require the use of appropriate BMPs when issuing building permits or equivalent process.		X						Ongoing since FY 11-12	a.ii
a.5. Educate installers and operators on appropriate BMP implementation.		X						Ongoing since FY 11-12	a.ii
a.6. Enforce against non-compliance as needed.		X						Ongoing since FY 11-12	a.ii
a.7. Certify legal authority to prohibit the discharge of water to storm drains generated from the installation, cleaning, treating, and washing of the surfaces of copper architectural features, including copper roofs. (2016 AR only)	A	X						9/15/2016	a.iii
a.8 Report how copper architectural features are addressed through the issuance of building permits (2016 AR only)	A	X						9/15/2016	a.iii
a.9 Report annually on permitting and enforcement activities.	X	A						9/15/2015	a.iii
C.13.b. Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals									
Goal: Establish the legal authority to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals.									
Actions –									
b.1. Through a local ordinance either: 1) require installation of a sanitary sewer discharge connection for pools, spas, and fountains, including connection for filter backwash, with a proper permit from the POTWs; or 2) require diversion of discharge for use in landscaping or irrigation.		X						Ongoing	b.ii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead, A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.13

Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
b.2. Certify that legal authority exists to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals (2016 AR only)	A	X						9/15/2016	b.iii
a.8 Report how copper containing discharges from pools, spas and fountains are addressed through the issuance of building permits (2016 AR only)	A	X						9/15/2016	b.iii
a.9 Report annually on permitting and enforcement activities .	X	A						9/15/2016	b.iii
C.13.c. Industrial Sources									
Goal: To ensure industrial facilities do not discharge elevated levels of copper to storm drains by ensuring, through industrial facility inspection, that proper BMPs are in place.									
Actions –									
c.1. Identify facilities likely to use copper or have sources of copper and include them in revisions to your inspection program plans.	A	X	A					6/30/2011	c.ii.(1)
c.2. Train inspectors to identify copper sources and proper BMPs (synonymous with Task C.4.d.2) .	X	A						5/5/2011	c.ii.(2)
c.3. Ensure that proper BMPs are in place at industrial facilities with copper sources to minimize discharge of copper to storm drains, including consideration of roof runoff that might accumulate copper deposits from ventilation systems on-site.		X						Ongoing	c.ii.(3)
c.4. Highlight copper reduction results in the industrial inspection component in the C.13 portion of each Annual Report .	A	X						9/15/2015	c.iii

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead, A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.13



SECTION 14

POLYBROMINATED DIPHENYL ETHERS (PBDE), LEGACY PESTICIDES AND SELENIUM

Provision C.14 - Polybrominated Diphenyl Ethers (PBDE), Legacy Pesticides and Selenium

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.14.a. Control Program for PBDEs, Legacy Pesticides, and Selenium.									
Goals: Work with the other municipal stormwater management agencies in the Bay Region to implement a plan (PBDEs/Legacy Pesticides/Selenium Plans) to identify, assess, and manage controllable sources of PBDEs, legacy pesticides, and selenium found in urban runoff, if any.									
Actions –									
a.10. Provide follow-up on next steps regarding these pollutants.	X		X					Ongoing	a.vii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.14



SECTION 15

EXEMPTED AND CONDITIONALLY EXEMPTED DISCHARGES

Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.15.a. Exempted Non-stormwater Discharges (Exempted Discharges)									
Goals: Have the legal authority, training, and outreach to address new C.15. requirements, and continue to implement discharge prohibitions.									
Actions –									
a.1. Allow the non-stormwater discharges listed in Provision C.15.a.i, unless they are identified as sources of pollutants to receiving waters, in which case they shall be addressed as conditionally exempted discharges.		X						Ongoing	a.ii
C.15.b. Conditionally Exempted Non-Stormwater Discharges									
Goal: Implement BMPs, notification, monitoring and reporting requirements for categories of conditionally exempted non-stormwater discharges regulated under C.15.b.									
Actions –									
b.2.1 Update the Program's Conditionally Exempted Discharges Report as needed.	X	A						As needed	b.i-b.vi
b.3. Work through BASMAA to address major issues related to compliance with C.15., as needed.	X	A						TBD	b.i-b.vi
b.4. To address discharges from individual residential car washing, conduct outreach to residents about BMPs for car washing as part of PIP program under C.7.	A	X						Ongoing	b.iv
b.5. Keep records of the authorized major discharges of dechlorinated pool, hot tubs spa and fountain water to the storm drain, including BMPs employed.		X						Ongoing	b.v.
b.6. To address discharges from irrigation water, landscape irrigation and lawn or garden watering, promote water conservation, IPM/less toxic pest control, use of drought tolerant native vegetation, and improved irrigation practices as part of general PIP and pesticide user outreach. Conduct outreach to residents about BMPs as part of PIP program under C.7.	A	X						Ongoing	b.vi
b.7. Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff in conjunction with the Co-permittee's existing Illicit Discharge Control Program.	A	X						Ongoing	b.vi

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.15

Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	Program	Co-permittee	Regional	FY 15-16				Completion Date (Unless Noted) ¹	Applicable Sub-provision
				Q1	Q2	Q3	Q4		
C.15.c. General Assistance									
Goal: Provide general assistance and guidance in implementing Provision C.15.									
Actions-									
c.1. Provide guidance on BMPs and reporting for various types of discharges. Assist Co-permittees with data collection efforts, data management, and reporting, as needed.	X	A						Ongoing	b.i-b.vi
c.2. Continue to assist Co-permittees identify and characterize potential new categories of discharges that could request an MRP exemption.	X	A						TBD	b.i-b.vi
c.3. Continue to assist Co-permittees with implementation of the Water Utility O&M Discharge Pollution Prevention Plan and tracking the development of the Regional Water Utility General Permit	A	X						Ongoing	b.iii.

¹ Completion dates in bold are specified in MRP. Dates in italics are internal deadlines based on MRP requirements. Key: X = Implementation lead. A = assist or develop guidance for implementation. FY 15-16 Work Plan - C.15



SECTION 16

FINAL BUDGET REPORT: FISCAL YEAR 2015-2016

SCVURPPP Total FY 2015-2016 Budget

<i>Budget Summary</i>	
Item	Budget
Operational Group	
1. Program Management (EOA)	\$695,894
2. Fiscal Agent (City of Sunnyvale)	\$50,000
3. Legal Services (MOFO)	\$120,000
4. CASQA Dues	\$17,500
5. BASMAA Fee	\$88,000
6. WERF Member Dues	\$8,000
7. Contingency (MOA Requires 10 %of Operating Group)	\$0
8. RMP Fee	\$194,361
9. CPSC Fee	\$1,000
10. MOA Initiate MC Internal Review (see FY 13-14 Budget)	0
Subtotal Operational Group	\$1,174,755
Projects Group – Permit Compliance Tasks	
Regulatory Assistance	\$529,633
Performance Standards	\$2,742,921
Sub-total Project Group	\$3,272,554
Total FY 15-16 Budget	\$4,447,309

Note: MC approved budget on December 14, 2014 (see budget package for assumptions).



APPENDIX A

RESPONSE TO CO-PERMITTEE COMMENTS

Program Staff Responses to Comments on SCVURPPP Draft FY 2015-2016 Work Plan

C.3. New Development and Redevelopment

C.3.a/C.3.c: The Program should consider providing a workshop for the development community (e.g., private engineering firms) on C.3 requirements and design of LID site measures.

A task was added to conduct a workshop as requested or focusing a portion of the Annual C.3 workshop towards the development community.

C.3.a.8.1: Add “ongoing” to completion date column.

Requested edit was made

C.3.b.3.2: Add “development of standard specifications” to the list of items that Program staff will support for GI plan development

Requested edit was made

C.3.h: Consider hosting a training workshop on identifying and maintaining LID treatment systems for landscape maintenance staff and facility managers (municipal and private). Can be done as an add-on or special session of the Annual C3 Workshop, but has a specific target audience that is different from typical workshop audiences.

Requested edit was made

C.5 – Illicit Discharge Detection and Elimination

C.5.e.4: Please clarify language. Unclear what is supposed to happen here. If we are supposed to distribute educational materials to mobile businesses when responding to a complaint, then it should simply say so.

The task was edited to read “Conduct outreach to mobile businesses operating within the Permittee’s jurisdiction, such as distribution of BMP brochures to mobile businesses when responding to a complaint”.

C.7 – Public Information and Outreach

C.7.h.3: Typo “use” should be “used”

Requested edit was made

C.7.i.1: Co-permittee box should have an X in it

Requested edit was made

C.8 – Water Quality Monitoring

C.8.c.8: Please designate an “A” in the Co-permittee box

Requested edit was made

C.8.g.3: Please consider an “A” in the Co-permittee box here since they review and comment prior to submittal

Requested edit was made

C.9 – Pesticide Toxicity Reduction

C.9.b.1: Recommend deleting the phrase “receive annual training” at the end of the section to maintain consistency with permit language

Requested edit was made

C.9.c.3: X and A appear reversed. It seems like the primary responsibility for this action lies with the Co-permittees. Program provides guidance in the annual report.

Requested edit was made

C.9.c: This section has been updated to reflect the requirements in the Admin Draft of MRP 2.0. This section should reflect existing MRP requirements: if the Admin Draft requirements remain and are adopted, Co-permittees would likely need to amend municipal code/policies to comply. Program may need to support that with guidance on how to effectively oversee contractor compliance. Reporting would be Co-permittee led with assistance from Program.

Tasks were revised in this section to indicate that the Program will “provide guidance on potential future MRP requirements for Co-permittees” as needed.

C.10. Trash Reduction

C.10.a.4.vi: What is the purpose of Program developing and maintaining list of FTC devices for O&M verification and effectiveness reporting outside of the Co-permittees maintenance programs and documentation? I would not want to create additional reporting and data management on our maintenance staff.

The purpose of this task is to continue populating the Program’s existing database on full capture devices, locations and types, and treatment areas. Additionally, as part of the model O&M verification program, we plan to develop a simple tracking database to allow Permittees to track maintenance and inspection of these devices consistent with MRP 2.0 requirements. Some Permittees may choose to use their own tracking systems already in place, but others have expressed a need for such a database (spreadsheet). The task description was edited to this affect.

C.10: We'll need to consider how we do O&M for systems other than small and large full trash capture devices (i.e., C.3/GI) and way want to expand our draft documents to include this consideration.

Agreed. We will work with the AHTG to incorporate these concepts as the MRP 2.0 requirements become clearer.

C.12 PCB Controls

C.12.b. Co-permittees should be involved in this task (it's listed as assist Co-permittees, but Co-permittee box didn't have an "X"). Also, I think that this should be a place holder task and specify that work plan will be developed based on final requirements and timing of MRP 2.0.

Agreed. An "X" was added to Co-permittee box. Also the language "As required by MRP 2.0" was added.

C.12.c.1: Missing action assignments

"X" was added to Program and "A" to Co-permittee.

C.12.d,e,f: Please state when tasks were completed

Tasks are planned for completion in FY 2014-15.

C.12.i.5: New regulations say "3000" individuals must be reached. Will that be tracked by Program or Co-permittees?

Tracking under the new MRP will be discussed with Co-permittees, but please note that the statement "potential to reach 3000 individuals annuallylikely consumers" applies to ALL MRP Co-permittees, and that the Program will need to develop an approach to sample & estimate the likely consumers.

C.12.i.5: Should be C.12.i.6? "S" a typo?

Correct. Change was made.

C.12.k.1: Consider softening language to reflect our intention to work with businesses first rather than jumping to referral for all properties. X or A in Co-permittees column.

The requested text was added.