



Provision C.2 - Municipal Operations FY18-19

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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.2 Report implementation and compliance with these BMPs in each Annual Report.	A	X	9/30/2018		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.2 Report implementation and compliance with these BMPs in each Annual Report.	A	X	9/30/2018		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.2. Report implementation and compliance with these BMPs in each Annual Report.	A	X	9/30/2018		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 18-19 Work Plan - C.2



Provision C.2 - Municipal Operations FY18-19

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.2.d. Stormwater Pump Stations => NA in WV cities					
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 –					
Rural Roads are applicable to LG, MS and Saratoga (WVCWP has checked with EOA staff). Obtain current RR BMPs; compare to BMPs covered in last WVCWP training (Spring 2006) Determine whether muni staff need an update training. Encourage muni staff to attend SCVURPPP RR training in Spring 2019.		X	ASAP		
e.1. Implement existing/modified Rural Public Works BMPs.		X	Ongoing		e.ii.(1) & (2)
e.2. Incorporate existing training and guidance on permitting requirements for rural public works activities.	A	X	Ongoing		e.ii.(3)
e.3. Provide training to public works maintenance staff at least twice within Permit term.	A	X	Twice during the Permit term (dates TBD)		e.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 18-19 Work Plan - C.2



Provision C.2 - Municipal Operations FY18-19

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.2.f. Corporation Yard BMP Implementation					
Goal: Develop and implement site specific Stormwater Pollution Prevention Plans (SWPPPs) for corporation yards.					
Actions –					
Discuss need to add Parks Maintenance Corp Yard to Campbell's SWPPP		X	TBD		
f.1. Implement and maintain site specific SWPPPs for corporation yards.	A	X	Ongoing		f.i.(1)&(2)
Review and update Campbell, Los Gatos, Saratoga SWPPPs		X	TBD		
f.2. Implement all corporation yard BMPs.	A	X	Ongoing		f.ii.(1),(3),(4) &(5)
f.3. Conduct inspections of each corporation yard annually, between September 1 and September 30.		X	Annually in September		f.ii.(2)
f.4. Report implementation and compliance with these BMPs in each Annual Report.	A	X	9/30/2018		f.iii
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.
g.2 Continue to assist with pesticide tracking and reporting through Maintenance AHTG.	X		Ongoing as needed	Reported in Section C.9.a	C.9.a

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 18-19 Work Plan - C.2



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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.1. Continue to evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as under CEQA.		X	Ongoing	Review with department reviews	a.i (3)
a.2. i. Conduct annual workshop on C.3 Implementation	X		Annually	SCVURPPP workshop date: _____, 2019	a.i (4)
a.3. Provide training/assistance to internal department staff on C.3. requirements as appropriate	A	X	As needed	Saratoga has requested review/training, new CDD	a.i (4)
a.4. 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		a.iii.
C.3.b. Regulated Projects					
Goal: Implement requirements for different categories of new development or redevelopment projects regulated under C.3.					
Actions –					
b.1. Participate in the BASMAA Development Committee (assume 12 meetings during FY 18-19) and work groups (assume 4 meetings) to oversee development of regional MRP products and share information about C.3 implementation strategies and experience.	X	X	Ongoing as needed	Will Sheila go to BASMAA meetings?	b.iii.
b.2. Continue to provide guidance and assistance with annual reporting of C.3. project and Special Project information.	X		Annually (9/30/2018)		b.v.1
b.3. Continue to assist Co-permittees with implementation of C.3 and LID on projects, including assistance with questions on specific projects and LID/HM applicability, and other technical support and presentations.	X		Ongoing	Remind Cities they have this available	b.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 18-19 Work Plan - C.3



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
b.4. Continue to assist with the C3PO AHTG and work group meetings and action items.	X		Ongoing		
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, including infiltration, evapotranspiration, rainwater harvesting/use, or biotreatment, onsite or at a joint treatment facility.	A	X	Ongoing		c.i.2.c
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	Ongoing		d.i.
d.2. Continue implementing guidelines on using infiltration devices.	A	X	Ongoing		d.iv.
C.3.e. Alternative or In-Lieu Compliance with Provision C.3.b.					
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.1. Apply LID Treatment Reduction Credit to Special Projects as needed.	A	X	Ongoing		C.3.e.ii
e.2. Track and report Special Projects to the Water Board on September 30 of each year.	A	X	Annually (9/30/2018)		c.3.e.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 18-19 Work Plan - C.3



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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 –					
f.1. Report projects reviewed by third parties in the reporting tables for Provision C.3.b.		X	Annually (9/30/2018)	EOA for Los Gatos	f.iii
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.1. Continue to provide guidance on implementation of hydromodification management (HM) requirements, including use of the Bay Area Hydrology Model to size HM control facilities. Participate (via Program staff time to discuss and review products) in a regional study to evaluate a methodology for using direct simulation of erosion potential for sizing facilities to meet the HM standard (does not include contributions to a regional study, as the value to SCVURPPP is yet to be determined).	A	X	Ongoing; Regional study TBD		g.i.
g.2. Report information on approved HM Projects per C.3.b.v. and C.3.g.iv.	A	X	Annually 9/30/2018		g.iv.
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 –					
Prioritized O&M Inspection Plan		X	ASAP/TBD	We currently do not have an actual Plan, just disjointed SOPs. Need to research to see what other cities have for this	h.ii.(6)
Update Enforcement Response Plan		X	Yearly as needed	ERP needs overhaul as part of combined ERP review with C4, C5, C6	h.ii.(7)
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	Remind muni staff to mail O&M letters	h.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 18-19 Work Plan - C.3



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
h.2. 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	X	Annually (9/30/2018)	Submit list for all four cities to EOA with Annual Report	h.ii., h.iv.
h.3. Continue to maintain and update a database of Regulated Projects that have installed stormwater treatment systems and HM controls.	A	X	Ongoing		h.ii.
Collect updated Regulated Projects table/O&M tracking table yearly from cities, collect O&M inspection forms (Installation and annual/routine)		X	Feb-Mar Annually	WVCWPA collects from cities, confirms accuracy of table for reporting data in AR	
h.4. Provide training for O&M inspectors as part of the C.3 or other workshops.	X		Spring/Summer 2019	SCVURPPP workshop date: _____, 2019	h.ii.
h.5. 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.1 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	Confirm process yearly, maybe create a form to have munis sign off on yearly	i.i
i.2 Annually, report the implementation of the requirements on Provsion C.3.i.	A	X	Annually 9/30/2018		i.ii
C.3.j. Green Stormwater Infrastructure (GSI) Planning and Implementation					
Goal: To complete and implement a GSI Plan for the inclusion of low impact development drainage design into storm drain infrastructure on public and private lands, including streets, roads, storm drains, parking lots, building roofs, and other storm drain infrastructure elements.					
Actions –					
j.2. Update the resource library of GSI-related documents on the SCVURPPP website for Co-permittee reference and use; prepare case studies of existing GSI Plans and new Bay Area GSI projects; and post SCVURPPPP products. Create public SWRP webpage and migrate GSI resources to it, along with SWRP related information and products.	X		Ongoing (July 2018 for SWRP webpage)		j.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 18-19 Work Plan - C.3



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
j.4. Assist Co-permittees with the selection and use of prioritization, mapping and tracking tools as part of development of GSI Plans.	X	A	Ongoing		j.i.(2)(a)
j.5. Continue to work with Co-permittee staff to obtain input on and complete updates to the GSI guidelines, details, and specifications (GSI Handbook). Produce an updated final GSI Handbook that can be referenced in Co-permittee GSI Plans.	X	A	3/30/2019		j.i.(2)(e)
j.7 Continue to update related municipal planning documents with GSI language.	A	X	Ongoing		j.i.(2)(h)
j.8 Adopt policies, ordinances, and/or other legal mechanisms to ensure implementation of GSI Plan.	A	X	9/30/2018?		j.i.(3)
j.9. Continue to implement outreach strategy and promote GSI concepts to the general public, in coordination with WEO AHTG, Watershed Watch and SCVWD. Also begin outreach to development community. Submit a summary of local GSI outreach and education efforts annually.	X	A	Annually 9/30/2018		j.i.(4)(a)
j.10. Continue to conduct training for Co-permittee staff on GSI concepts, planning, designs, and implementation; includes development/distribution of training materials and media, a countywide workshop, and assistance to individual municipalities (as budget allows).	X	A	6/30/2019		j.i.(4)(b)
j.11. Assist with education of elected officials on the MRP GSI requirements and GSI Plans as needed.	A	X	Ongoing	TBD	j.i.(4)(c)
j.12. Continue to assist Co-permittees with evaluating and reporting GSI incorporation in Co-permittee CIP projects, as needed.	A	X	Ongoing	Yearly review with each PW Dept	j.ii.(1),(2)
j.13. Continue to work with BASMAA and other countywide, regional, and State agencies to promote GSI. Continue to provide guidance on completing sections of GSI Plan, including estimating impervious area targets and incorporating Program tracking methodology.	A	A	Ongoing		j.iii.(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 18-19 Work Plan - C.3



Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
j.14. Complete development of methodology and tools for tracking, mapping, and reporting implementation of GSI measures (coordinate with PCB/Hg load reduction tracking/reporting), and train Co-permittees in their use.	X	A	6/30/2019		j.iv.
j.15. Continue work with District and Co-permittees to develop a countywide SWRP. Conduct grant management tasks, including TAC meetings, reporting and final project documentation. Continue to update SWRP website with SWRP-related information and products. (Provides supplemental budget to grant funded tasks.)	X	A	3/30/2019		
j.16. Continue to provide guidance on completing sections of GSI Plan, including estimating impervious area targets and incorporating Program tracking methodology. (Guidance on impervious area targets will be completed by September 2018).	X	A	3/30/2019		j.i.(2)
j.17. Update Program guidance on possible options for funding mechanisms to design, construct and maintain prioritized GSI projects, as needed, to incorporate any changes in legislation, grant opportunities, etc. The guidance will include a review and summary of data on local/regional GSI costs to help inform the GSI Plan.	X	A	3/30/2019		j.i.(2)(k)
Complete GSI Plan approval process Complete and submit GSI Plans to Water Board	A	X	With Annual Report Sept. 2019	Continue to work with EOA to assist cities in completion of their Plans	j.i.(5)(b)
j.18. Work with CASQA and WEF to arrange for and conduct a local training under the National Green Infrastructure Certification Program (NGICP) to help municipal staff obtain certification.	X		6/30/2019		

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 18-19 Work Plan - C.3



Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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 –					
IND/Comm Business Inspection Plan Overhaul needed		X	ASAP		
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	Business license lists (in progress, but roadblocks)	b.ii (1)
1)Potential Facilities List overhaul 2)Yearly Inspection List overhaul		X	ASAP		
b.2. Implement current/revised inspection plans as appropriate.		X	Ongoing		b.i
b.3. 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 (3)
b.4. Report list of all industrial and commercial facilities requiring inspections	A	X	9/30/2018		b.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 –					
Update Enforcement Response Plan		X	Yearly as needed	ERP needs overhaul as part of combined ERP review with C3, C5, C6	C.4.c

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 18-19 Work Plan - C.4



Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
c.1. Implement and update as needed an ERP to guide inspectors to take consistent actions to achieve timely and effective compliance from commercial and industrial site operators.	A	X	Yearly as needed	ERP needs overhaul as part of combined ERP review with C3, C5, C6	c.ii.
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.(1)
d.2 Maintain adequate records of inspections in electronic database.	A	X	Ongoing		d.ii.(2)
d.3 Evaluate the frequency of potential and actual non-stormwater discharges by business category, note trends and implement, as needed, focused inspections/education in subsequent years.	A	X	Annually		d.ii.(3)
d.4. Submit inspection data and results in the Annual Report each year.	A	X	9/30/2018		d.iii
C.4.e. Staff Training					
Goal: Provide focused training for inspectors annually, as required by the MRP					
Actions –					
e.1. Conduct 1 inspector training each year.	X		Annually	SCVURPPP:	d.ii
e.2. Include training dates, training topics and percentage of IDDE & Industrial/Commercial inspectors attending the training in each Annual Report	A	X	9/30/2018		d.iii
General Assistance					
Goal: Provide general assistance and guidance for implementing Provision C.4.					
Actions-					
1. Continue to assist Co-permittees with: 1) business inspection plans and priorities; 2) data management; and 3) enforcement response plans. Administer and participate in the IND/IDDE AHTG.	A	X	Ongoing	Get assistance with updates, Kristin helped review existing Plans, March 2018	b.ii (2)
2. Continue to assist Co-permittees with updating or developing outreach materials.	A	X	Ongoing		b

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 18-19 Work Plan - C.4



Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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	Find copies of muni code sections that apply and copy onto server	a.ii.
C.5.b. Enforcement Response Plan (ERP)					
Goal: Implement 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 –					
b.1. Update as needed an ERP to guide inspectors taking consistent actions to achieve timely and effective abatement of illicit discharges.	A	X	Yearly as needed	ERP needs overhaul as part of combined ERP review with C3, C4, C6	b.ii.
C.5.c. Spill, Dumping, Complaint Response Program					
Goal: Provide a central contact point for Permittee staff and the public for spill and dumping complaints and response. At a minimum, the central contact 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	Ongoing	Need to ensure this is current for 18-19. Check websites; confirm with muni staff (which staff?)	c.ii (1)
c.2 As feasible, have user friendly web reporting for spills and dumping.		X	Ongoing	Need to ensure this is current for 18-19. Check websites; confirm with muni staff (which staff?)	c.ii.(1)
c.3 Update Permittee website with central contact point to report spills and dumping.		X	Ongoing	Need to ensure this is current for 18-19. Check websites; confirm with muni staff (which staff?)	c.ii (2)
c.4 Require municipal staff conducting routine maintenance and inspection activities to report illicit discharges.		X	Ongoing	Covered extensively at Maintenance Supervisors Training April 2018. Add to Tailgate Trainings.	c.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 18-19 Work Plan - C.5



Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
c.5 Maintain and update spill/dumping/complaint response flow chart and/or phone tree for staff responsible for IDDE program.		X	1/1/2016, Ongoing	Needs update	c.ii.(4)
c.6. Maintain and update 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	Needs update	c.ii (5)
c.7. 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, in 2016 and 2019 Annual Reports.	A	X	9/30/2016, 9/30/2019	Report in 18-19 AR. Need Screen Shots of muni websites. Check websites; confirm with muni staff (which staff?) that info on website is accurate/up-to-date	c.iii.
C.5.d 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 –					
d.1. Continue to assist Co-permittees with: 1) complaint tracking and follow-up database; 2) collection system screening programs; and 3) inspector training (annual training combined with C.4).	A	X	Ongoing	SCVURPPP Training:	d.ii
d.2. Report relevant data in each Annual Report.	A	X	9/30/2018		d.iii.
C.5.e Control of Mobile Sources					
Goal: Establish oversight and control of pollutants associated with mobile business sources					
Actions –					
e.1 Continue to implement standard BMPs for various types of mobile businesses.	A	X	Ongoing		e.ii.(1)(a)
e.2 Continue to implement enforcement strategy that specifically addresses the unique characteristics of mobile businesses.	A	X	Ongoing		e.ii.(1)(b)
e.3 Continue to regularly update mobile business inventory.	X	A	Ongoing		e.ii.(1)(c)

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 18-19 Work Plan - C.5



Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
e.4 Continue to implement outreach for mobile businesses.	A	X	Ongoing		e.ii.(1)(d)
e.5 Inspect mobile businesses as needed, on a complaint basis or as part of the commercial facility inspection plan.		X	Ongoing	Add to Commercial Inspection Plan	e.ii.(1)(e)
e.6 Report on BMPs, inventory, inspections, enforcement, and outreach in 2017 and 2019 Annual Report	A	X	9/30/2019	How is this different from last year's AR? (JS) Check 16-17 AR for reference; obtain outreach & inventory info from SCVURPPP (KO)	e.iii.
C.5.f. Municipal Separate Storm Sewer System (MS4) Map					
Goal: Make the maps of MS4 available					
Actions –					
f.1 Make maps of MS4 publicly available, either electronically or in hard copy, through a single point of contact.	A	X	Ongoing; Completed 7/1/2010		f.ii
f.1.1 Publicize availability of MS4 map through directories and websites	A	X	ASAP Q1 2019	Get on websites (which muni staff to contact?)	f.ii
f.2. Discuss how maps are made available to the public and how they are publicized in 2016 and 2019 Annual Reports	A	X	9/30/2019	Publicize maps on websites ("outreach" contacts). Ask muni outreach staff to coordinate with PW/IT staff?	f.iii.
General Assistance					
Goal: Provide general assistance and guidance for implementing Provision C.5					
Actions-					
1. Administer and participate in the IND/IDDE AHTG.	A	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 18-19 Work Plan - C.5



Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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 -					
a.1. Implement current/revised legal authority.		X	Ongoing	Find copies of muni code sections that apply and copy onto server	a.ii.
C.6.b. Enforcement Response Plan (ERP)					
Goal: Implement 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. Update as needed the ERP to guide inspectors to take consistent actions to achieve timely and effective compliance from construction site operators.	A	X	Ongoing	ERP needs overhaul as part of combined ERP review with C3, C4, C5	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. Continue to provide updated information and outreach on construction BMPs for construction sites.	A	X	Ongoing	Work with Building Depts to confirm they have necessary BMP materials	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.1. Provide educational materials to site operators and developers.		X	Ongoing	Work with Building Depts to confirm they have necessary BMP materials	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 18-19 Work Plan - C.6



Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
d.2 Review erosion/pollution control plan or SWPPP to verify compliance with local requirements and seasonally appropriate and effective BMPs		X	Ongoing		d.ii.1
d.3 Verify sites disturbing one acre or more of soil have filed a NOI		X	Ongoing		d.ii.2
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, hillside projects and high priority sites to prepare for the upcoming wet season.		X	Ongoing (By September 1 each year)		e.ii.1
Program review with Permittees		X	As needed	Meet with Building Depts to review program and AR data collection. LG done _____, S to do, MS to do, C TBD	
e.2. 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.3. Track all inspections in an electronic database or tabular format.	A	X	Ongoing		e.ii.4
e.4. Summarize inspection information in each Annual Report.	A	X	9/30/2018		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 –					

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 18-19 Work Plan - C.6



Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
f.1. Conduct annual workshop on Construction Site Management. Include training on inspection type and frequency, minimum BMPs, BMP installation and maintenance, and implementation of enforcement response plans, as needed.	X		Annually	SCVURPPP Trainings: 3/5 & 3/7 Cupertino Cmnty Ctr	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	9/30/2018	SCVURPPP Trainings: 3/5 & 3/7 Cupertino Cmnty Ctr	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 18-19 Work Plan - C.6



Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/ Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
General Assistance					
Goal: Provide general assistance and guidance for implementing Provision C.6.					
Actions-					
1. Continue to assist Co-permittees with inspection and enforcement issues, data compilation efforts, data management, and annual reporting. Administer and participate in the Construction AHTG.	X	A	Ongoing		
2. Continue to assist Co-permittees with updating or developing outreach materials.	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 18-19 Work Plan - C.6



Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permits	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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	Send Reminder to Cities: due in next year's AR. Report compliance in 2020 AR. Need to get accurate numbers from cities.	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.ii
C.7.b. Outreach Campaigns					
Goal: Participate in or contribute to outreach campaigns 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.	A	X	Ongoing		b.ii
b.2. Summarize Campaign activities and submit in Annual Report each year.	X	A	9/30/2018		b.iii
b.3. Continue to provide funding to support the City of San Jose's outreach partnership with either the San Jose Earthquakes or the San Jose Sharks.	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 18-19 Work Plan - C.7



Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.7.c. Stormwater Pollution Prevention Education					
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 –					
c.1. Continue to maintain and publicize Co-permittee phone numbers for information on stormwater issues.	A	X	Ongoing	Cross Ref with C.5.c.(1,2,3) Tasks. Check muni websites.	c.ii (1)
c.2. Maintain a Co-permittee website for providing information on stormwater issues, or provide a link to the Watershed Watch website from the Co-permittee website.	A	X	Ongoing	Check muni websites. Cross Ref with C.5.c.(1,2,3). Report in C.5 in 18-19 w/screen shots	c.ii (2)
c.3. 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		c.ii (2)
c.4. List the point of contact and website and describe how it is publicized and maintained in 2018 Annual report.	X	X	9/30/2018	Check muni websites. Cross Ref with C.5.c.(1,2,3) Tasks Report in C.5 in 18-19 w/screen shots	c.iii.
C.7.d. Public Outreach and Citizen Involvement 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 –					
d.1. The Program will annually participate in 8-10 outreach events and citizen involvement events, collect data on participation, and evaluate effectiveness. Co-permittees and AdManor will help with staffing. Co-permittee may conduct additional outreach events locally.	X	X	Ongoing	Required: MS = 2 Events; Los Gatos & Saratoga = 4 Events; Campbell = 5 Events (by population)	d.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 18-19 Work Plan - C.7



Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permits	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
d.2. Program will continue to support creek cleanups by providing funding to advertise the 2018 Coastal Cleanup 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. <i>(Note: allocation of additional budget for advertising the 2019 National River Clean Up Day will be discussed with the Budget AHTG during development of the final draft FY 19-20 budget.)</i>	X	A	Ongoing		d.i., ii.
d.3. Develop and print brochures and other outreach materials as needed. Coordinate with Admanor as needed.	X	A	As needed		
d.4. In the Annual Report, provide details of each outreach event, data on participation, and assess the effectiveness of efforts.	X	X	9/30/2018		d.iii.
C.7.e. 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					
e.1. Program will continue to participate in and support WMI activities including Steering Committee, Zero Litter Initiative, and Land Use 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	Is anyone from WVCWP attending any of these meetings? ZLI? Campbell supports SB Clean Creeks Coalition by hauling trash from SBCCC cleanups. Could we have WVCWP partnering with SBCCC in some way? Providing outreach materials for them?	e.i., ii.
e.2. Participate in and Chair the Land Use Subgroup. Develop outreach pieces as needed and assist in implementing the Annual C.3. Workshop.	X	A	Ongoing		e.i., ii.
e.3 Host and maintain WMI website.	X	A	<i>Beginning 7/1/15, Ongoing</i>		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 18-19 Work Plan - C.7



Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
e.4. In each Annual Report, provide the level of effort, describe support given, activities implemented and evaluation of effectiveness.	X		9/30/2018		e.iii.
C.7.f. 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 –					
f.1. Continue to sponsor ZunZun school assemblies at elementary schools in Santa Clara Valley, and assess effectiveness of efforts.	X	A	Ongoing		f.i., ii.
f.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	"...and other local (Co-permittee) outreach programs, and assess effectiveness of efforts."	f.i., ii.
f.3. In each Annual Report, provide the level of effort, spectrum of children reached, methods used and effectiveness evaluation.	X	X	9/30/2018		f.iii.
C.7.g. 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 –					
g.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		g.ii
Santa Clara Countywide South Bay Green Gardens Program					
Goal: Implement a collaborative, unified, Santa Clara County-branded educational program on sustainable landscaping practices, coordinating the various agency stormwater and solid waste programs already being offered, in cooperation with the Santa Clara County Recycling and Waste Reduction Commission Technical Advisory Committee.					
Actions --					
1. Continue to support the Santa Clara Countywide South Bay Green Gardens Program through Work Group meetings and provide content for the South Bay Green Gardens website, as needed.	X	X	Ongoing	KO participates in SBGG	

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 18-19 Work Plan - C.7



Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Applicable Sub-provision
C.8.a. Compliance Options				
Goals: Continued participation in the Regional Monitoring Collaborative (RMC); develop tools and plan actions 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.1. 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	a.i
a.2 Continue managing the Program's creek status, POC, pesticide/toxicity monitoring, and stressor/source identification programs required by MRP 2.0.	X	A	<i>Ongoing</i>	a.i
C.8.b. Monitoring Protocols and Data Quality				
Goals: Develop methods consistent with SWAMP SOPs; and monitoring data that is SWAMP comparable				
Actions –				
b.1. Enter collected creek status, POC, SSID, and pesticide/toxicity monitoring data into the Program's information management system	X		<i>Ongoing</i>	
b.2. Conduct quality assurance procedures on all monitoring data collected.	X		Ongoing	b.
b.3. Oversee monitoring subcontractors and provide data quality evaluations of data collected.	X		<i>Ongoing</i>	
b.4. Review and update as needed RMC SOP and QAPP documents to maintain standardized data collection among programs/contractors and develop data that are SWAMP comparable	X		<i>As Needed</i>	
b.5. Continue to contribute to a BASMAA regional project to provide on-call services to respond to regionally applicable issues associated with the RMC database.	X		<i>As Needed</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 18-19 Work Plan - C.8



Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Applicable Sub-provision
C.8.c. SF Bay Monitoring RMP				
Goal: Financially contribute to and participate in the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP).				
Actions –				
c.1. Financially contribute to the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP)	A	X	Annually	c.
c.2. On behalf of BASMAA, actively participate in RMP steering and technical review committees, and workgroups	X	A	<i>Ongoing</i>	c.
C.8.d. 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 –				
d.1. Prepare for creek status monitoring, including equipment and field supply preparation, site reconnaissance, and final site selection.	X	A	<i>Ongoing</i>	d.i
d.2. Conduct biological assessments, water chemistry (nutrients and conventional), general water quality and physical habitat assessment; measure chlorine.	X	A	Spring 2019	d.i, ii,
d.3. Conduct continuous water quality (sondes), temperature and pathogen indicator sampling.	X		Spring/ Summer 2019	d.iii, iv, v
d.4. Financially contribute to and participate in a BASMAA regional project designed to evaluate and synthesize creek status bioassessment and water quality data collected by all MRP Permittees/Programs over the past 5 years, and recommend modifications to the RMC sample frame needed to answer priority questions.	A	A	<i>September 2019</i>	d.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 18-19 Work Plan - C.8



Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Applicable Sub-provision
d.5. Financially contribute to and participate in a BASMAA regional project intended to implement recommendations to modify the RMC sample frame.	A	A	<i>December 2020</i>	d.i
C.8.e. Stressor/Source Identification (SSID) Projects				
Goal: Define and conduct stressor/source identification projects.				
Actions –				
e.1. Review results from Creek Status and Pesticide and Toxicity Monitoring and maintain list for all sites with results that exceed triggers.	X	A	Ongoing	e. i
e.2. Conduct Coyote Creek Toxicity SSID project that was initiated in FY 17-18. Submit project report with Urban Creeks Monitoring Report	X	A	<i>3/31/2019</i>	e.iii
e.3. Select one additional SSID project by the end of the fiscal year that will begin implementation in FY 19-20.	X	A	<i>6/30/2019</i>	e.ii
e.4. Develop a work plan for a regional SSID project (Regional Task – SCVURPPP contribution \$6,000), per requirements in MRP 2.0. The level of effort associated with this task is commensurate with the time needed to conduct these tasks on behalf of the Program.	A	A	<i>Ongoing</i>	e.ii
C.8.f. Pollutants of Concern 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 –				
f.1. Develop and submit POC Monitoring Report describing WY 2018 accomplishments and WY 2019 allocation of POC sampling effort	X	A	10/15/2018	h.iv
f.2. Conduct Water Year 2019 POC Monitoring	X	A	6/30/2019	f.ii
f.3. Complete and submit Water Year 2018 POC Monitoring Data Report.	X	A	3/31/2019	h.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 18-19 Work Plan - C.8



Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Applicable Sub-provision
f.4. Participate in the RMP's Emerging Contaminants Work Group to ensure that POC Monitoring requirements associated with emerging contaminants (e.g., PFOS/PFAS, PFAS, and alternative flame retardants) are addressed.	X	A	Ongoing	f.ii
f.5. Contribute to and participate in, a BASMAA regional project to evaluate the effectiveness of PCB control measures and assist with MRP-required POC monitoring.	A	A	3/3/2019	f.ii
C.8.g. Pesticide and Toxicity Monitoring				
Goal: Conduct pesticide and toxicity 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 –				
g.1. Conduct Water Year 2018 dry season pesticides (sediment) and toxicity monitoring (water and sediment).	X	A	Summer 2018	g.i, ii
C.8.h. Reporting				
Goal: Report on monitoring activities, results, conclusions and next steps consistent with MRP requirements.				
Actions –				
h.1. Develop and submit electronic creek status monitoring data to Water Board.	X	A	3/31/2019	h.ii
h.2. Develop and submit Urban Creeks Monitoring Report to Water Board.	X	A	3/31/2019	h.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 18-19 Work Plan - C.8



Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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	Send Annual Notice "No over the counter pesticides use" and "IPM flyer" to comply with muni IPM Plans?	a.ii
a.2 Annually, Permittees shall certify that they are implementing the IPM Policy/Ordinance and standard operating procedures.	A	X	Annually 9/30/2018		a.iii (1)
a.3 Continue to track the use of the following active ingredients on municipal properties: diamides (chlorantraniliprole and cyantraniliprole); diuron, fipronil and its degradates; indoxacarb; organophosphorous insecticides (chlorpyrifos, diazinon, and malathion); pyrethroids (metofluthrin, bifenthrin, cyfluthrin, beta-cyfluthrin, cypermethrin, deltamethrin, esfenvalerate, lambdacyhalothrin, and permethrin); and carbamates (e.g., carbaryl and aldicarb).	A	X	Ongoing		a.iii (1)
a.4. 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. Reporting of the newly added active ingredients, i.e, diuron, diamides, and indoxacarb will start in the 2017 Annual Report.	A	X	Annually, 9/30/2018		a.iii (1)
a.5. Annually, provide brief description of a minimum of two IPM actions implemented in the reporting year, focusing to the extent possible on new or enhanced actions taken	A	X	Annually, 9/30/2018		a.iii (2)
a.6. Maintain pesticide application standard operating procedures and submit upon request.		X	Ongoing		a.iii (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 18-19 Work Plan - C.9



Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
a.8. Continue to provide staff support to Co-permittees in implementing requirements in Provision C.9.	X		Ongoing		a.iii (3)
C.9.b. Training 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	9/30/2018		b.ii.(1)
b.3 In the Annual Report, briefly describe the type of training (tailgate, external agency etc.)	A	X	9/30/2018		b.ii.(1)
b.4. Compile training materials (e.g., course outline, date, attendees) for submittal to Water Board upon request.	A	X	As needed		b.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 on municipal properties.					
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		c.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 18-19 Work Plan - C.9



Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
c.2. Observe contractor activities to verify full implementation of IPM techniques, or at a minimum, evaluate the lists of pesticides and amounts of active ingredients used.	A	X	Ongoing		c.ii.
C.3 Annually, state how your agency verified contractor compliance with IPM policies and any actions taken or needed to correct contractor performance	A	X	9/30/2018		c.iii
C.9.d. Interface with County Agricultural Commissioners					
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; 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. Continue to regularly communicate with County Agricultural Commissioner to share information and receive input and assistance with urban pest management. Coordinate development of newsletters, distribution of training announcements, and website links and content, as needed.	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.		X	Ongoing		d.ii
d.3. Report on improper pesticide usage reported to County Ag. Commissioner and follow-up actions to correct violations.		X	Ongoing		d.ii
d.4. 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	9/30/2018		d.ii
C.9.e. Public Outreach					

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 18-19 Work Plan - C.9



Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
Goal: To develop and implement public outreach related to reducing pesticide use and encouraging private landscaper irrigation management that minimizes pesticide runoff.					
Actions –					
e.1. Continue to provide staff support for the Regional OWOW Store Partnership project and conduct the local IPM Store Partnership Program at 33 stores in Santa Clara County, visiting stores three times annually, purchasing fact sheets and other promotional material, store employee training, staffing outreach events and media advertising.	X	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	9/30/2018		e.iii
e.3. Conduct outreach to structural pest control professionals, on a local, countywide or regional level, as appropriate.	X	X	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		9/30/2018		e.iii
e.5. 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	Ongoing		e.ii (3)
e.6. 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	Ongoing		e.ii (3)
e.7. 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	9/30/2018		e.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 18-19 Work Plan - C.9



Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.9.f. Track and Participate in Relevant Regulatory Processes					
Goal: Track and participate in relevant regulatory processes through Program staff participation and contributions to a BASMAA regional project (part of a larger CASQA project) that is designed to address water quality problems caused by pesticides by changing the pesticide registration process.					
Actions –					
f.1. Track and participate in CASQA's Pesticide Subcommittee and as necessary, assist (via BASMAA as appropriate) with developing letters of support to USEPA and California DPR on re-registration, reevaluation and other actions relating to pesticides of concern for water quality.	A	A	Ongoing		f.i
f.2. Report participation in relevant regulatory processes and list information submitted. Participation may be an individual or regional effort.	A	A	9/30/2018		f.ii
f.3. Track U.S. EPA and California Department of Pesticide Regulation (DPR) pesticide evaluation activities as they relate to surface water quality and, when necessary, encourage DPR to coordinate implementation of the California Food and Agriculture Code with California Water Code and to accommodate water quality concerns within its pesticide evaluation process.	A	A	9/30/2018		f.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 by Copermitee staff and contractors, and the attainment of pesticide concentration and toxicity targets for water and sediment from monitoring data. Identify improvements that the Permittee will focus on in the subsequent permit term. Summarize findings in FY 18-19 Annual Report.	X	X	9/30/2019	Check with SCVURPPP for expectations on this; reporting is in FY 18-19 only	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 18-19 Work Plan - C.9



Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.10.a. Trash Reduction Requirements					
Goals: Permittees shall implement trash load reduction control actions to meet the goal of 80% trash load reduction by July 1, 2019.					
Actions –					
a.1. Implement trash prevention and control actions consistent with Long-Term Plans, that were updated (as necessary) via action plans submitted to the Water Board.	A	X	<i>On-going</i>		a
a.2. Install and/or maintain mandatory minimum full capture systems.	A	X	<i>On-going</i>		a.ii
a.3. Delineate and map drainage/treatment areas for all full capture systems.	A	X	<i>On-going</i>		a.ii
a.4. Report on efforts to identify and map the location of all land greater than 10,000 ft ² that are plumbed directly Co-permittee storm drain systems, and assess each land area to determine the current trash generation status.	X	A	9/30/2018	Maps done. OVTAs to do prior to June 2019. Data collection	a.ii.b
C.10.b. Demonstration of Trash Reduction Outcomes					
Goals: To maintain, and provide for inspection and review upon request, documentation of the design, operation, and maintenance of each of their full trash capture systems, including the mapped location and drainage area served by each system.					
Actions –					
b.1. Provide guidance and training in coordination with C.2 – Municipal Operations on implementing and reporting of full capture device operation and maintenance programs.	X	A	On-going		b.i.a
b.2. Maintain full capture devices to specifications in the MRP, including increases in frequencies based on maintenance results. Retain device-specific maintenance records including dates, capacity condition, special problems, etc.	A	X	On-going	Data collection is challenging with the cities	b.i.a-b

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 18-19 Work Plan - C.10



Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
b.3. Certify that full capture systems are operated and maintained consistent with the full capture definition.		X		Yearly on annual report	b.i.c
b.4. Maintain and provide for inspection (upon request) documentation of non-full capture system trash control actions.	A	X	Ongoing	Streetsweeping, yard waste, extra creek cleaning data collected	b.ii
b.5. Perform Visual Assessment of outcomes of other trash management actions to extent described in C.10.b.ii.	X	A	On-going		b.ii.b
b.6. Maintain a data management system to manage on-land assessment information.	X		<i>On-going</i>		b.ii.b
b.7. Conduct one visual assessment training workshop for Co-permittee staff.	X	A	<i>TBD</i>	<i>Feb. 2019</i>	b.ii.b
b.8. Continue implementation (as applicable) of actions to reduce trash at the source (e.g., product-based ordinances).		X	<i>On-going</i>	<i>i.e. plastic bag, EPS bans</i>	b.iii
b.9. Using data provided via the Program's Trash Characterization Study and other information, provide substantive evidence for reductions claimed for source control actions in Annual Report.	X	X	9/30/2018	Done	b.iv
b.10. Continue implementing the Program's receiving water monitoring program for trash based on monitoring tools and protocols developed in FY 16-17 via a BASMAA regional project.	X	X	On-going	Two creek monitoring sites, data collection	b.v
C.10.c. 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 –					
c.1. Develop and distribute guidance on collecting hot spot information	X		<i>12/1/2018</i>		c

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 18-19 Work Plan - C.10



Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
c.2. Cleanup Trash at Trash Hot Spots to a level of "no visual impact" at least one time per year.		X	Ongoing	Data collection	c.i
c.3. Submit trash assessment data to SCVURPPP staff.		X	<i>6/30/2018</i>		
c.4. Populate FY 17-18 annual report tables with Co-permittee trash assessment data.	X		<i>8/1/2018</i>		c.iii
c.5. Provide on-going management of the hot spot database, compile assessment data and develop summary report.	X	A	<i>Ongoing</i> <i>9/30/2018</i>		c.iii
C.10.d. Trash Load Reduction Plans					
Goal: To maintain, and provide for inspection and review upon request, a Trash Load Reduction Plan, including an implementation schedule to meet the C.10.a Trash Load Reduction requirements.					
Actions –					
d.1. Update long-term plans (as necessary) to document revisions.	A	X	Ongoing		d
d.2. Revise baseline trash generation maps as necessary.	X	A	9/30/2018		d
C.10.e. Optional Trash Load Reduction Offset Opportunities					
Goal: Additional actions taken to offset provision C.10.a trash load percent reduction requirement.					
Actions –					
e.1. Conduct additional creek and shoreline cleanups (as applicable).		X	Ongoing	Campbell only. Data collection	e.i
e.2. Implement a Direct Trash Discharge Control Program (as applicable).		X	Ongoing		e.ii
C.10.f. Reporting					
Goal: To report all trash reduction activities in Annual Report each year.					
Actions –					

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 18-19 Work Plan - C.10



Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA/Permittees	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
f.1. Summarize trash control actions within each TMA including types, levels, areas, whether new or ongoing, and initiation date.	A	X	9/30/2018	Data collection	f.i
f.2. Provide updated maps (generation, TMA, full capture, hot spot) upon request by Executive Officer.	X	X	On-going		f.ii
f.3. Provide any revised maps (generation, TMA, full capture, hot spot) in 2018 Annual Report.	X	X	9/30/2018		f.iii
f.4. Provide accounting of On-Land Assessments (or other evaluations of non-FC controls) including summary descriptions, number, and dates of observations.	X	A	9/30/2018		f.iv
f.5. Report trash reductions associated with full capture systems and other actions demonstrated to-date.	A	X?	9/30/2018		f.v
f.6. Report volumes removed for current and previous 5 years hot spot cleanups.	A	X	9/30/2018		f.vii
f.7. Report summary descriptions of additional cleanups where offests claimed.	A	X	9/30/2018		f.viii
f.8. Report on the progress on the testing/implementation of the Program's Receiving Water Monitoring for trash.	A	X?	9/30/2018		f.vi
Zero Litter Initiative (ZLI)					
Goal: Actively participate in ZLI activities.					
Actions –					
1. Participate in monthly steering and outreach committee meetings.	X		<i>Ongoing</i>		
2. Continue to coordinate ZLI webinar series on trash management and assessment.	X	A	<i>Ongoing</i>		
3. Continue to coordinate with CalTrans via the ZLI.	X	X	<i>Ongoing</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 18-19 Work Plan - C.10



Provision C.11 - Mercury Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.11.a. Implement Control Measures to Achieve Mercury Load Reductions					
See C.12.a.					
C.11.b. Assess Mercury Load Reductions from Stormwater					
See C.12.b.					
C.11.c. Plan and Implement Green Infrastructure to reduce mercury loads					
See C.12.c.					
C.11.d. Prepare Implementation Plan and Schedule to Achieve TMDL Allocations					
See C.12.d.					
C.11.e. Implement a Risk Reduction Program					
See C.12.h.					

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 18-19 Work Plan - C.11



Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.12.a. Implement Control Measures to Achieve PCBs Load Reductions.					
Goals: To implement PCBs source and treatment control measures and pollution prevention strategies to achieve PCBs load reductions					
Actions –					
a.1. Continue conducting property investigation and abatement projects in collaboration with applicable Co-permittees.	X	A	On-going		
a.2. Coordinate with the City of San Jose, City of Sunnyvale other Co-permittees and the Water Board staff on source property referrals as needed.	X	A	<i>On-going</i>		
a.3. Develop an updated list of watersheds and control measures implemented to-date per provision C.12.a.	X	A	9/30/2018		a.iii
C.12.b. Assess PCBs Load Reductions from Stormwater					
Goal: To quantify the PCBs load reductions achieved through all the pollution prevention, source control, and treatment control measures Permittees will implement in this Permit term, except for measures to manage PCB-containing materials and wastes during building demolitions (C.12.f).					
Actions –					
b.1. Calculate load reductions and develop draft and final load reduction reports for submittal to the Water Board.	X	A	9/30/2018		b.iii
C.12.c. Plan and Implement Green Infrastructure to reduce PCBs loads					
Goal: To implement green infrastructure projects during the term of the Permit to achieve PCBs load reduction performance criteria in Table12.2 by June 2020.					
Actions –					
c.1. Implement and track public GSI projects and track the implementation of private GSI projects.	A	X	<i>On-going</i>	<i>Data collection</i>	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 18-19 Work Plan - C.12



Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.12.d. Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations.					
Goal: To prepare a plan and schedule for PCBs control measure implementation and reasonable assurance analysis demonstrating that sufficient control measures will be implemented to attain the PCBs TMDL wasteload allocations by 2030.					
Actions –					
c.1. Continue conducting a reasonable assurance analysis (RAA) to adequately quantify the benefits of GSI and other controls for PCB and mercury reduction and provide assurance that TMDL Wasteload Allocations will be achieved over time. Program subconsultant tasks that will be completed in FY 18-19 include modeling to demonstrate the quantitative relationship between GSI and PCBs/mercury, demonstrating PCB/mercury load reductions for existing GI facilities, and predicting the waterquality benefits of future GSI implemented in the Santa Clara Valley. Additionally, contribute to the development of a regionally consistent portion of the RAA for source controls.	X	A	Relationship between PCBs and GSI due 9/30/2018. Other RAA tasks on-going		c.iii
C.12.e. Evaluate the Presence of PCBs in Caulks/Sealants used in Storm Drains or Roadway Infrastructure					
Goal: To collect samples of caulk and other sealants used in storm drains and between concrete curbs and street pavement and investigate whether PCBs are present in such material and in what concentrations.					
Actions –					
e.1. Continue to contribute to a BASMAA regional project, which in FY 18-19 will implement the field portion of the sampling and analysis plan. (Report on sampling data and analysis due by 2018 Annual Report)	A	A	<i>On-going</i>		e.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 18-19 Work Plan - C.12



Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.12.f. Manage PCB-Containing Materials and Wastes during Building Demolition Activities so that PCBs don't enter the MS4					
Goal: To implement an effective protocol for managing materials with PCBs concentrations of 50 ppm or greater in applicable structures at the time such structures undergo demolition so that PCBs do not enter MS4s.					
Actions –					
f.1. Actively participate in a BASMAA regional project to develop a protocol for managing materials with PCBs in applicable structures.	A	A	<i>8/1/2018</i>		f.ii
f.2. Conduct outreach and training to Co-permittees staff on materials created via the BASMAA regional project and assist Co-permittees on the development and adoption of new/revised ordinances or other legal authority to implement these requirements. SCVURPPP staff will provide information on the model ordinance and guidance on any changes that may need to be made locally.	X	A			f.ii
f.3. Begin full implementation of the PCBs in building demolition control program.	A	X	6/30/2019	Develop and approve programs, in progress	f.ii
C.12.g. Fate and Transport Study of PCBs – Urban Runoff Impacts of Bay Margins					
Goal: To conduct studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas.					
Actions –					
g.1. Continue to actively participate and track Bay Margins monitoring occurring through the RMP.	X	A	On-going		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 18-19 Work Plan - C.12



Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
C.12.h. Implement a Risk Reduction Program					
Goal: To conduct an ongoing risk reduction program to address public health impacts of PCBs in San Francisco Bay/Delta fish.					
Actions –					
h.1. 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		h.ii
Coordinate with CalTrans on Load Reduction Allocation Sharing Scheme					
Continue to work with CalTrans on identifying projects in the Santa Clara Valley that will assist in the reduction of mercury from stormwater. Coordination efforts will occur via participation in discussions facilitated by Program staff, in coordination with BASMAA as necessary. Trash and green infrastructure considerations will also be included in this task.	X	A	<i>Ongoing</i>		NA

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 18-19 Work Plan - C.12



Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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.1. Require the use of appropriate BMPs when issuing building permits or equivalent process.		X	Ongoing	Need to train muni staff on this?	a.ii (1)
a.2. Educate installers and operators on appropriate BMP implementation.		X	Ongoing	How is this being handled?	a.ii (2)
a.3. Enforce against non-compliance as needed.		X	Ongoing		a.ii (3)
a.4. Report annually on permitting and enforcement activities.	A	X	9/30/2018		a.iii (3)
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
b.2 Report annually on enforcement activities.	A	X	9/30/2018		b.iii.(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 18-19 Work Plan - C.13



Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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.	A	X	<i>Ongoing</i>	How is this done, on-going? We always report no industrial sources. Does a new business have to file paperwork that would alert the city?	c.ii.(1)
c.2. Include facilities likely to use copper or have sources of copper in your inspection program plans.		X	Ongoing	see above	c.ii.(1)
c.3. Educate inspectors to identify copper sources and proper BMPs.	X	A	Ongoing		c.ii.(2)
c.4. 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.5. Highlight copper reduction results in the industrial inspection component in the C.13 portion of each Annual Report .	A	X	9/30/2018	Annual reports always state: "no industrial sources" but how this is checked	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 18-19 Work Plan - C.13



Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
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.i
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.1. To address discharges from pumped groundwater, foundation drains and water from crawl space pumps and footing drains, collect samples for monitoring when required, and follow all associated BMPs.		X	Ongoing	Are Building Inspectors trained on this?	b.i.
b.2. 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.3. 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	Keep records?	b.v.
b.4. 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.5. 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 18-19 Work Plan - C.15



Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	Completion Date (Unless Noted) ¹	Status	Applicable Sub-provision
General Assistance					
Goal: Provide general assistance and guidance in implementing Provision C.15.					
Actions-					
1. Update and provide guidance on BMPs for conditionally exempted non-stormwater discharges and reporting for various types of discharges as needed. Assist Co-permittees with data collection efforts, data management, and reporting, as needed.	X	A	Ongoing		b.i-b.vi
2. Continue to assist Co-permittees with guidance on implementation of the Water Utility O&M Discharge Pollution Prevention Plan and implementation of the State Drinking Water System Discharges General Permit.	A	X	Ongoing		b.iii.
3. As applicable, report on implementation of State Drinking Water System Discharges General Permit in water utility Annual Report to the State Board	A	X	3/1/2019	Who reports this? I'm checking with SCVURPPP (JS)	

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 18-19 Work Plan - C.15