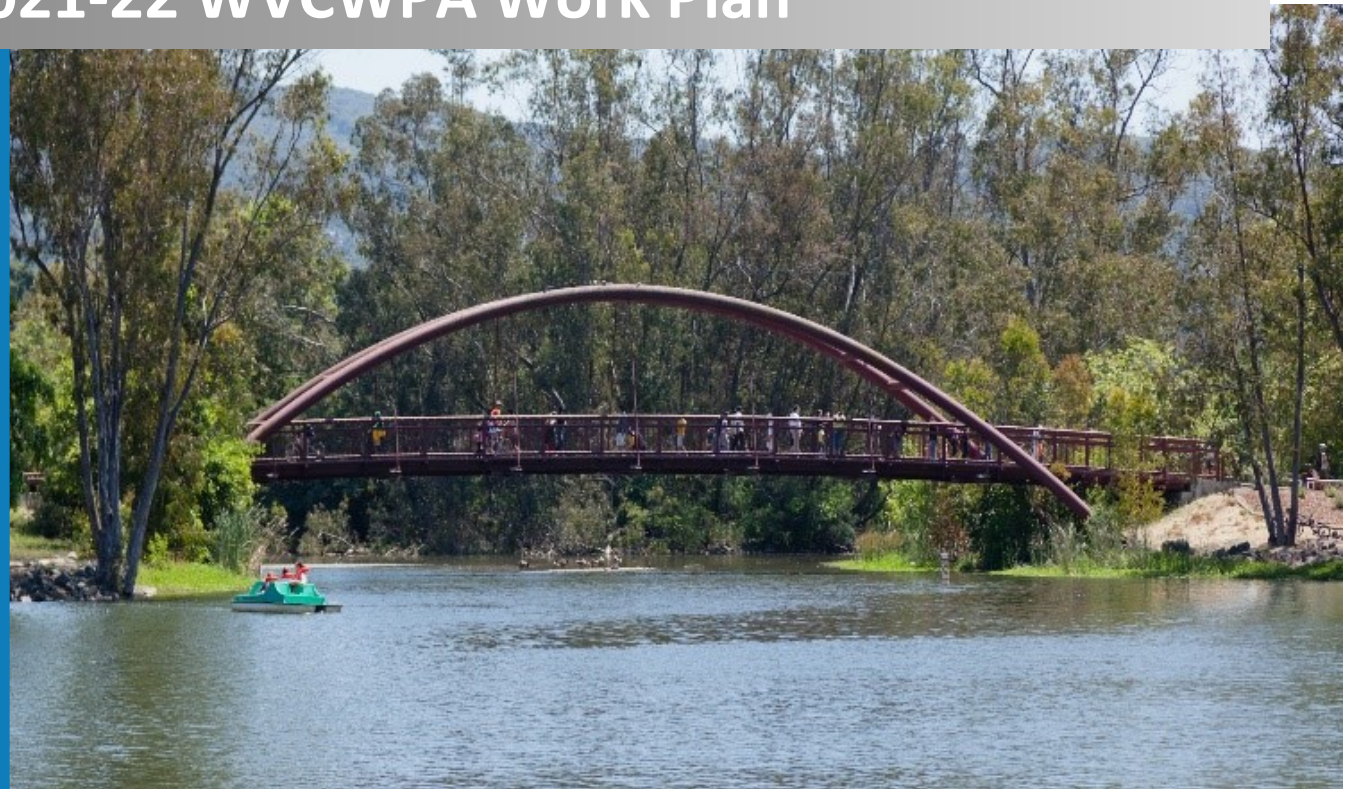




## FY2021-22 WVCWPA Work Plan



## Introduction

Actions described in this Work Plan are those required by the Municipal Regional Stormwater NPDES Permit (MRP 2.0) for the San Francisco Bay Area. The Work Plan provides implementation tasks for West Valley Clean Water Program Authority (WVCWPA) and the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) for fiscal year (FY) 2021-2022. The Work Plan was developed in coordination with the development of WVCWPA's FY 2021-2022 proposed budget and is consistent with the level of effort represented by the budget items.

The Work Plan includes clearly defined actions, responsibilities and schedules to be implemented by WVCWPA and collectively through SCVURPPP area-wide activities. The Work Plan was developed by the WVCWPA and the SCVURPPP to include new, expanded or redirected efforts required by MRP 2.0, which was adopted on November 19, 2015 and became effective January 1, 2016.

The following Work Plan tables include a description of all actions required for each MRP sub-provision in Sections C.2 - C.15. 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 by WVCWPA or SCVURPPP. The implementation schedules are shown by shaded cells for the four quarters of FY 2021-2022. Completion dates presented in bold are due dates specified in MRP 2.0, and dates presented in italics are internal due dates based on the permit-required completion dates.



## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.2.a. Street and Road Repair and Maintenance</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
a.1. Implement existing/modified Street and Road Repair and Maintenance BMPs		X					<i>Ongoing</i>	a.ii.(1)&(2)
a.2 Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2021</b>	a.iii
<b>C.2.b. Sidewalk/Plaza Maintenance and Pavement Washing</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
b.1. Implement existing/modified Sidewalk/Plaza Maintenance and Pavement Washing BMPs.		X					<i>Ongoing</i>	b.i.
b.2 Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2021</b>	b.ii
<b>C.2.c. Bridge and Structure Maintenance and Graffiti Removal</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
c.1. Implement existing/modified Bridge Structure Maintenance and Graffiti Removal BMPs.		X					<i>Ongoing</i>	c.ii.(1)(2)(3)
c.2. Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2021</b>	c.iii.

<sup>1</sup> 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.



## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.2.d. Stormwater Pump Stations</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
d.1. Implement appropriate management actions, as required, at pump stations whose discharges have DO levels at or below 3 mg/l.		X					<i>Ongoing</i>	d.ii.(1)
d.2. Inspect pump stations to ensure they are free of debris and trash; maintain oil absorbent booms; investigate and abate illicit discharges.		X					<i>Ongoing</i>	d.ii.(2)
d.3. Maintain records of inspection, maintenance and implementation of corrective actions. Submit to WB upon request.	A	X					<i>Ongoing</i>	d.ii.(3)
<b>C.2.e. Rural Public Works Construction and Maintenance</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
e.1. Implement existing/modified Rural Public Works BMPs.		X					<i>Ongoing</i>	e.ii.(1) & (2)
e.2. Incorporate existing training and guidance on permitting requirements for rural public works activities.	A	X					<i>Ongoing</i>	e.ii.(3)
e.3. Provide training to public works maintenance staff at least twice within Permit term. SCVURPPP staff will conduct the second Rural Public Works BMP training during FY 21-22	X	X					<b>FY 21-22</b>	e.ii.(4)
e.4. Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2021</b>	e.iii

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## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.2.f. Corporation Yard BMP Implementation</b>								
<b>Goal:</b> Develop and implement site specific Stormwater Pollution Prevention Plans (SWPPPs) for corporation yards.								
<b>Actions –</b>								
f.1. Implement and maintain site specific SWPPPs for corporation yards.	A	X					<i>Ongoing as needed</i>	f.i.(1)&(2)
f.2. Implement all corporation yard BMPs.	A	X					<i>Ongoing as needed</i>	f.ii.(1),(3),(4) &(5)
f.3. Conduct inspections of each corporation yard annually, between September 1 and September 30.		X					<b>Annually in September</b>	f.ii.(2)
f.4. Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2021</b>	f.iii
<b>General Assistance</b>								
<b>Goal:</b> Provide general assistance and guidance for implementing Provision C.2.								
<b>Actions-</b>								
1. Provide guidance on BMP implementation, monitoring, data management, and reporting. Administer and participate in the Municipal Maintenance AHTG.	X						<i>Ongoing as needed</i>	a.,b.,c.,e.
2. Assist with pesticide tracking and reporting through Maintenance AHTG.	X						<i>Ongoing as needed</i>	C.9.a

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## Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.3.a. New Development and Redevelopment Performance Standard Implementation</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
a.1. Evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as under CEQA.		X					<i>Ongoing</i>	a.i (3)
a.2. i. Conduct annual workshop on C.3 Implementation	X	X					<i>6/30/2022</i>	a.i (4)
a.3. Provide training/assistance to internal department staff on C.3. requirements as appropriate.	A	X					<i>As needed</i>	a.i (4)
a.4. Update the C.3 Handbook and other guidance, based on experience with implementation of LID requirements, and updates to outreach flyers as needed.	X	A					<i>Ongoing</i>	a.iii.
<b>C.3.b. Regulated Projects</b>								
<b>Goal:</b> Implement requirements for different categories of new development or redevelopment projects regulated under C.3.								
<b>Actions –</b>								
b.1. Participate in the BASMAA Development Committee (assume 6 meetings during FY 20-21) and work groups (assume 4 meetings) to oversee development of regional MRP products and share information about C.3 implementation strategies and experience.	X	A					<i>Ongoing as needed</i>	b.iii.
b.2. Provide guidance and assistance with annual reporting of C.3. project and Special Project information.	X						<b>Annually (9/30/2021)</b>	b.v.1
b.3. 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						<i>Ongoing</i>	b.i. & ii.

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### Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
b.4. Assist with the C3PO AHTG and work group meetings and action items.	X						<i>Ongoing</i>	
<b>C.3.c. Low Impact Development</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	c.1.2.c
<b>C.3.d. Numeric Sizing Criteria for Stormwater Treatment Systems</b>								
<b>Goal:</b> To ensure that stormwater treatment systems constructed for Regulated Projects meet the appropriate hydraulic sizing criteria.								
<b>Actions –</b>								
d.1. Use the numeric sizing criteria for Regulated Projects.	A	X					<i>Ongoing</i>	d.i.
d.2. Implement guidelines on using infiltration devices.	A	X					<i>Ongoing</i>	d.iv.
<b>C.3.e. Alternative or In-Lieu Compliance with Provision C.3.b.</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
e.1. Apply LID Treatment Reduction Credit to Special Projects as needed.	A	X					<i>Ongoing</i>	C.3.e.ii
e.2. Track and report Special Projects to the Water Board on September 30 of each year.	A	X					<b>Annually (9/30/2021)</b>	c.3.e.vi.

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## Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.3.f. Alternative Certification of Stormwater Treatment Systems</b>								
<b>Goal:</b> Allow a qualified third party reviewer to certify the adequacy of design of stormwater treatment measures (per C.3.d. and f.).								
<b>Actions –</b>								
f.1. Report projects reviewed by third parties in the reporting tables for Provision C.3.b.		X					<b>Annually (9/30/2021)</b>	f.iii
f.2. Begin biannual update of "List of Qualified Consultants for Design, Review and/or Certification of Stormwater Treatment Best Management Practices and Hydromodification Flow Control Facilities".	X						6/30/2022	
<b>C.3.g. Hydromodification Management (HM)</b>								
<b>Goal:</b> Implement final HM requirements on applicable Regulated Projects, to protect receiving streams from increase in runoff peak flows, volumes and durations.								
<b>Actions –</b>								
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.	X	A					<i>Ongoing</i>	g.i.
g.2. Report information on approved HM Projects per C.3.b.v. and C.3.g.iv.	A	X					<b>Annually (9/30/2021)</b>	g.iv.
<b>C.3.h. Operation and Maintenance of Stormwater Treatment Systems</b>								
<b>Goal:</b> Implement an Operation and Maintenance (O&M) Verification Program to ensure the proper O&M of installed treatment control BMPs.								
<b>Actions –</b>								
h.1. Implement a BMP O&M Verification Program. Program staff continue to assist with implementation of BMP O&M verification programs.	A	X					<i>Ongoing</i>	h.i.
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	A					<b>Annually (9/30/2021)</b>	h.ii., h.iv.
h.3. Maintain and update a database of Regulated Projects that have installed stormwater treatment systems and HM controls.	A	X					<i>Ongoing</i>	h.ii.

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### Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
h.4. Provide training for O&M inspectors as part of the C.3 or other workshops.	X	A					<i>12/30/2021</i>	h.ii.
h.5. Provide updated guidance on O&M for LID treatment measures as needed.	X	A					<i>Ongoing</i>	h.ii
<b>C.3.i. Required Site Design Measures for Small Projects and Detached Single-Family Home Projects</b>								
<b>Goal:</b> Require small projects to implement LID site design measures.								
<b>Actions –</b>								
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					<i>Ongoing</i>	i.i
i.2 Annually, report the implementation of the requirements on Provision C.3.i.	A	X					<b>Annually (9/30/2020)</b>	i.ii
<b>C.3.j. Green Stormwater Infrastructure (GSI) Planning and Implementation</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
j.2. GSI Resource Library: Continue to update the resource library of GSI-related documents on the SCVURPPP website for Co-permittee reference and use; prepare additional case studies of new local/regional GSI projects; and post SCVURPPP products. Continue to maintain and update SWRP website.	X						<i>On-going</i>	j.i.
j.4. GSI Tools Development: Continue to develop planning tools as part of the Stormwater Treatment Measure (STM) Data Portal, as directed by Co-permittees, including work on the module for quantifying GSI benefits and dashboard for displaying benefits data, and provide guidance/training on the use of the products.	X	A					<i>6/30/2022</i>	j.i.(2)(a)

<sup>1</sup> 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.

### Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
j.5. GSI Guidelines, Design Details, and Specifications: Continue to work with Co-permittee staff to identify and incorporate updates to the GSI Handbook, including creating additional SCVURPPP typical details and specifications and incorporating design guidance from the C.3 Stormwater Handbook and other sources.	X	A					<b>6/30/2022</b>	j.i.(2)(e)
j.9. Public Outreach and Education on GSI: Continue to implement outreach strategy and promote GSI concepts to the general public, in coordination with WEO AHTG, Watershed Watch and SCVWD, and to other audiences as described in the GSI Outreach Strategy.	X	A					<i>Ongoing</i>	j.i.(4)(a)
j.10. Co-permittee Staff Training: 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	X	A					<b>6/30/2022</b>	j.i.(4)(b)
j.13. Participate in Processes to Promote GSI: Continue to work with BASMAA, MTC, Caltrans, VTA, and other agencies to promote the inclusion of GSI in planning and funding processes.	A	A					<i>Ongoing</i>	j.iii.(1)
j.14. Tracking/Reporting Tools for Implementation of GSI Measures: Continue to maintain the STM Data Portal; update the Data Portal to improve PCB load reduction estimates; review and enter installed GSI facility data; generate reports and maps as needed; and implement an approved scope of work to add O&M data, inspection data, construction and O&M costs, and asset management features to the Data Portal as needed.	X	A					<b>6/30/2022</b>	j.iv.
j.17. Funding Options for GSI Implementation: Continue to provide Co-permittees with information on new legislation, grant opportunities and requirements, and alternative compliance/credit programs related to GSI funding. Develop updated funding options memo and assist with grant applications as needed.	X	A					<i>12/30/2021</i>	j.i.(2)(k)

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### Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
j.19. Assistance with Implementation of GSI Plans and Projects: Through discussions with Co-permittees, develop a scope of work for addressing ongoing and future Co-permittee GSI implementation needs based on MRP 3.0 requirements, and complete potential high priority products as determined in the scope of work and as budget allows.	X	X					6/30/2022	j.ii.(1),(2)

<sup>1</sup> 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.



## Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.4.a. Legal Authority for Effective Site Management</b>								
<b>Goals:</b> Establish sufficient legal enforcement authority to obtain effective stormwater pollutant control on industrial sites.								
<b>Actions –</b>								
a.1. Implement existing/revised legal authority.		X					<i>Ongoing</i>	a.i
<b>C.4.b. Industrial and Commercial Business Inspection Plan (Inspection Plan)</b>								
<b>Goal:</b> Develop and implement an inspection plan that will serve as a prioritized inspection work plan.								
<b>Actions –</b>								
b.1. Update and maintain a list of industrial and commercial facilities that could cause or contribute to pollution of stormwater runoff.	A	X					<b>Annually</b>	b.ii (1)
b.2. Implement current/revised Business Inspection Plans as appropriate.		X					<i>Ongoing</i>	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					<i>Ongoing</i>	b.ii (3)
b.4. Report list of all industrial and commercial facilities requiring inspections	A	X					<b>9/30/2021</b>	b.iii
<b>C.4.c. Enforcement Response Plan (ERP)</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	c.ii.

<sup>1</sup> 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.



## Provision C.4 - Industrial and Commercial Site Control

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.4.d. Inspections</b>								
<b>Goal:</b> Conduct inspections according to Inspection Plan and ERP								
<b>Actions-</b>								
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					<i>Ongoing</i>	d.ii.(1)
d.2 Maintain adequate records of inspections in electronic database.	A	X					<i>Ongoing</i>	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					<b>Annually</b>	d.ii.(3)
d.4. Submit inspection data and results in the Annual Report each year.	A	X					<b>9/30/2021</b>	d.iii.(2)
<b>C.4.e. Staff Training</b>								
<b>Goal:</b> Provide focused training for inspectors annually, as required by the MRP								
<b>Actions –</b>								
e.1. Conduct one inspector training each year.	X	A					<b>Annually</b>	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					<b>9/30/2021</b>	d.iii
e.3. Update or develop outreach materials (as needed).	X	A					<i>Ongoing</i>	b & d

<sup>1</sup> 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.



## Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.5.a. Legal Authority</b>								
<b>Goals:</b> Establish sufficient legal enforcement authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve compliance.								
<b>Actions –</b>								
a.1. Implement current/revised legal authority.		X					<i>Ongoing</i>	a.ii.
<b>C.5.b. Enforcement Response Plan (ERP)</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
b.1. Implement and update as needed an ERP to guide inspectors taking consistent actions to achieve timely and effective abatement of illicit discharges.	A	X					<i>Ongoing</i>	b.ii.
<b>C.5.c. Spill, Dumping, Complaint Response Program</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	c.ii (1)
c.2 As feasible, have user friendly web reporting for spills and dumping.		X					<i>Ongoing</i>	c.ii.(1)
c.3 Update Permittee website with central contact point to report spills and dumping.		X					<i>Ongoing</i>	c.ii (2)
c.4 Require municipal staff conducting routine maintenance and inspection activities to report illicit discharges.		X					<i>Ongoing</i>	c.ii.(3)

<sup>1</sup> 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.

## Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
c.5 Maintain and update spill/dumping/complaint response flow chart and/or phone tree for staff responsible for IDDE program.		X					<i>Ongoing</i>	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					<i>Ongoing</i>	c.ii (5)
<b>C.5.d Tracking and Case Follow up</b>								
<b>Goal:</b> To log and track follow-up, response to, and resolution of discharges reported to the complaint/spill system								
<b>Actions –</b>								
d.1. Conduct complaint tracking and follow-up database; 2) collection system screening programs; and 3) inspector training (annual training combined with C.4).	A	X					<i>Ongoing</i>	d.ii
d.2. Report relevant data in each Annual Report.	A	X					<b>9/30/2021</b>	d.iii.
d.3. Update or develop outreach materials (as needed).	X	A					<i>Ongoing</i>	c & e
<b>C.5.e Control of Mobile Sources</b>								
<b>Goal:</b> Establish oversight and control of pollutants associated with mobile business sources								
<b>Actions –</b>								
e.1 Implement standard BMPs for various types of mobile businesses.	A	X					<i>Ongoing</i>	e.ii.(1)(a)
e.2 Implement enforcement strategy that specifically addresses the unique characteristics of mobile businesses.	A	X					<i>Ongoing</i>	e.ii.(1)(b)
e.3 Regularly update mobile business inventory.	X	A					<i>Ongoing</i>	e.ii.(1)(c)
e.4 Implement outreach for mobile businesses.	X	X					<i>Ongoing</i>	e.ii.(1)(d)

<sup>1</sup> 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.

### Provision C.5 - Illicit Discharge Detection and Elimination

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
e.5 Inspect mobile businesses as needed, on a complaint basis or as part of the commercial facility inspection plan.		X					<i>Ongoing</i>	e.ii.(1)(e)
<b>C.5.f. Municipal Separate Storm Sewer System (MS4) Map</b>								
<b>Goal:</b> Make the maps of MS4 available								
<b>Actions –</b>								
f.1 Make maps of MS4 publicly available, either electronically or in hard copy, through a single point of contact.	A	X					<i>Ongoing</i>	f.ii
f.1.1 Publicize availability of MS4 map through directories and websites	A	X					<i>Ongoing</i>	f.ii

<sup>1</sup> 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.



## Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.6.a. Legal Authority for Effective Site Management</b>								
<b>Goals:</b> Have adequate legal authority to address new C.6. requirements, and continue to implement.								
<b>Actions -</b>								
a.1. Implement current/revise legal authority.		X					<b>Ongoing</b>	a.ii.
<b>C.6.b. Enforcement Response Plan (ERP)</b>								
<b>Goal:</b> 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. Implement and update as needed an ERP to guide inspectors to take consistent actions to achieve timely and effective compliance from construction site operators.	A	X					<b>Ongoing</b>	b.ii.
<b>C.6.c. Best Management Practices Categories</b>								
<b>Goal:</b> 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.								
<b>Actions -</b>								
c.1. Provide updated information and outreach on construction BMPs, working collaboratively with the BASMAA Development Committee and the CASQA Construction Subcommittee.	A	A					<i>Ongoing, as needed</i>	c.ii.
c.2. Update or develop outreach materials (as needed).	X	A						

<sup>1</sup> 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.

## Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.6.d. Plan Approval Process</b>								
<b>Goal:</b> Have adequate development review and permitting procedures to address 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.								
<b>Actions –</b>								
d.1. Provide educational materials to site operators and developers.	A	X					<b>Ongoing</b>	d.ii.(3)
d.2 Review erosion/pollution control plan or SWPPP to verify compliance with local requirements and seasonally appropriate and effective BMPs		X					<b>Ongoing</b>	d.ii.(1)
d.3 Verify sites disturbing one acre or more of soil have filed a NOI		X					<b>Ongoing</b>	d.ii.(2)
<b>C.6.e. Inspections</b>								
<b>Goal:</b> Implement a construction site inspection program to ensure compliance with local ordinances and effectiveness of BMPs.								
<b>Actions –</b>								
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					<b>Ongoing (By September 1 each year)</b>	e.ii.(1)
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					<b>Annually during wet season</b>	e.ii.(2)
e.3. Track all inspections in an electronic database or tabular format.	A	X					<i>Ongoing</i>	e.ii.(4)
e.4. Summarize inspection information in each Annual Report.	A	X					<b>9/30/2021</b>	e.iii

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### Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.6.f. Staff Training</b>								
<b>Goal:</b> Provide training or access to training for staff conducting construction site stormwater inspections. The MRP requires training at least every other year.								
<b>Actions –</b>								
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	A					<b>Annually</b>	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					<b>9/30/2021</b>	f.iii

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.7.a. Storm Drain Inlet Marking</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	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					<i>Ongoing</i>	a.ii
<b>C.7.b. Outreach Campaigns</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
b.1. 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					<i>Ongoing</i>	b.ii
b.2. Summarize Campaign activities and submit in Annual Report each year.	X	A					<b>9/30/2021</b>	b.iii

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
b.3. Provide funding to support the City of San Jose's outreach partnership with either the San Jose Earthquakes or the San Jose Sharks.	X						<i>Ongoing</i>	b.ii
<b>C.7.c. Stormwater Pollution Prevention Education</b>								
<b>Goal:</b> 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								
<b>Actions –</b>								
c.1. Maintain and publicize Co-permittee phone numbers for information on stormwater issues.	A	X					<i>Ongoing</i>	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					<i>Ongoing</i>	c.ii (2)
c.3. 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					<i>Ongoing</i>	c.ii (2)

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.7.d. Public Outreach and Citizen Involvement Events</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
d.1. 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					<i>Ongoing</i>	d.i., ii.
d.2. Continue to support creek cleanups by providing funding to advertise two clean up events (e.g., Coastal Cleanup Day and National River Cleanup Day).	X	A					<i>Ongoing</i>	d.i., ii.
d.3 Fund the San Francisco Bay National Wildlife Refuge at Alviso to conduct the Watershed Watchers Program.	X							
d.4. Develop and print brochures and other outreach materials as needed. Coordinate with Adman or as needed.	X	A					As needed	
d.5. In the Annual Report, provide details of each outreach event, data on participation, and assess the effectiveness of efforts.	X	X					<b>9/30/2021</b>	d.iii.
<b>C.7.e. Watershed Stewardship Collaborative Efforts</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
e.1. Participate in and support WMI activities, including 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					<i>Ongoing</i>	e.i., ii.

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
e.2. Through LUS, coordinate efforts with the Peninsula/South Bay Watershed Forum and other watershed groups, and co-host meetings and webinars.	X	A					<i>Ongoing</i>	e.i., ii.
e.3 Host and maintain WMI website.	X	A					<i>Ongoing</i>	e.i., ii.
e.4. In each Annual Report, provide the level of effort, describe support given, activities implemented and evaluation of effectiveness.	X						<b>9/30/2021</b>	e.iii.
<b>C.7.f. School-Age Children Outreach</b>								
<b>Goal:</b> 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).								
<b>Actions –</b>								
f.1. Sponsor ZunZun school assemblies at elementary schools in Santa Clara Valley, and assess effectiveness of efforts.	X	A					<i>Ongoing</i>	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					<i>Ongoing</i>	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					<b>9/30/2021</b>	f.iii.
<b>C.7.g. Outreach to Municipal Officials</b>								
<b>Goal:</b> To conduct outreach to municipal officials and increase overall awareness of stormwater and/or watershed message(s) among regional municipal officials.								
<b>Actions –</b>								

<sup>1</sup> 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.



### Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
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					<i>Ongoing</i>	g.ii

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**Provision C.7 - Public Information and Outreach**

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>Santa Clara Countywide South Bay Green Gardens Program</b>								
<b>Goal:</b> 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.								
<b>Actions --</b>								
1. 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					<i>Ongoing</i>	

<sup>1</sup> 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.



## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.8.a. Compliance Options</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
a.1. Participate 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					<b>Ongoing</b>	a.i
a. Manage 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
<b>C.8.b. Monitoring Protocols and Data Quality</b>								
<b>Goals:</b> Develop methods consistent with SWAMP SOPs; and monitoring data that is SWAMP comparable								
<b>Actions –</b>								
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						<b>Ongoing</b>	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>	

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### Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
b.5. Upgrade Program's database to conform with the State of California's CEDEN database. Develop a Program-specific information management system that will house historic, current, and future data collected in compliance with the MRP. Develop a user interface for Co-permittees to access data on Program's website.	X						<i>Ongoing</i>	

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.8.c. SF Bay Monitoring RMP</b>								
<b>Goal:</b> Financially contribute to and participate in the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP).								
<b>Actions –</b>								
c.1. Financially contribute to the San Francisco Estuary Regional Monitoring Program for Water Quality (RMP)	X	X					<b>Annually</b>	c.
c.2. On behalf of BASMAA, actively participate in RMP steering and technical review committees, and workgroups	X	A					<i>Ongoing</i>	c.
<b>C.8.d. Creeks Status Monitoring</b>								
<b>Goal:</b> 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).								
<b>Actions –</b>								
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					<b>Spring 2022</b>	d.i, ii,
d.3. Conduct continuous water quality (sondes), temperature and pathogen indicator sampling.	X						<b>Spring/ Summer 2022</b>	d.iii, iv, v
<b>C.8.f. Pollutants of Concern Monitoring</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								

<sup>1</sup> 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.

### Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
f.1. Develop and submit POC Monitoring Report describing WY 2021 accomplishments and WY 2022 allocation of POC sampling effort	X	A					<b>10/15/2021</b>	h.iv
f.2. Conduct Water Year 2022 POC Monitoring	X	A					<i>Ongoing</i>	f.ii
f.3. Complete and submit Water Year 2021 POC Monitoring Data Report.	X	A					<b>3/31/2022</b>	h.iv
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					<b>Ongoing</b>	f.ii

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.8.g. Pesticide and Toxicity Monitoring</b>								
<b>Goal:</b> 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).								
<b>Actions –</b>								
g.1. Conduct Water Year 2021 dry season pesticides (sediment) and toxicity monitoring (water and sediment).	X	A					<b>Summer 2021</b>	g.i, ii
<b>C.8.h. Reporting</b>								
<b>Goal:</b> Report on monitoring activities, results, conclusions and next steps consistent with MRP requirements.								
<b>Actions –</b>								
h.1. Develop and submit electronic creek status monitoring data to Water Board.	X	A					<b>3/31/2022</b>	h.ii
h.2. Develop and submit Urban Creeks Monitoring Report to Water Board.	X	A					<b>3/31/2022</b>	h.iii

<sup>1</sup> 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.

### Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.9.a. Maintain and Implement IPM Policy or Ordinance and Standard Operating Procedures</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
a.1. Require municipal employees and contractors to adhere to the IPM Policy/Ordinance and standard operating procedures.		X					<i>Ongoing</i>	a.ii
a.2 Annually, Permittees shall certify that they are implementing the IPM Policy/Ordinance and standard operating procedures.	A	X					<b>Annually, 9/30/2021</b>	a.iii (1)
a.3 Track the use of the following active ingredients on municipal properties: diamides (chlorantraniliprole and cyantraniliprole); diuron, fipronil and its degradants; 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					<i>Ongoing</i>	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.	A	X					<b>Annually, 9/30/2021</b>	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					<b>Annually, 9/30/2020</b>	a.iii (2)
a.6. Maintain pesticide application standard operating procedures and submit upon request.		X					<i>Ongoing</i>	a.iii (3)
a.8. Provide staff support to Co-permittees in implementing requirements in Provision C.9.	X						<i>Ongoing</i>	a.iii (3)

<sup>1</sup> 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.

### Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.9.b. Training Municipal Employees</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	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					<b>9/30/2021</b>	b.ii.(1)
b.3 In the Annual Report, briefly describe the type of training (tailgate, external agency etc.)	A	X					<b>9/30/2021</b>	b.ii.(1)
b.4. Compile training materials (e.g., course outline, date, attendees) for submittal to Water Board upon request.	A	X					<b>As needed</b>	b.ii.(2)
<b>C.9.c. Require Contractors to Implement IPM</b>								
<b>Goal:</b> To hire IPM-certified contractors and include contract specifications requiring contractors to implement IPM on municipal properties.								
<b>Actions –</b>								
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					<i>Ongoing</i>	c.i
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 use.	A	X					<i>Ongoing</i>	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					<b>9/30/2021</b>	c.iii

<sup>1</sup> 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.





## Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.9.d. Interface with County Agricultural Commissioners</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
d.1. 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					<i>Ongoing</i>	d.i
d.2. Report any violations of pesticide regulations (e.g., illegal handling) associated with stormwater management to the Ag. Commissioner.		X					<i>Ongoing</i>	d.ii
d.3. Report on improper pesticide usage reported to County Ag. Commissioner and follow-up actions to correct violations.		X					<i>Ongoing</i>	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					<b>9/30/2020</b>	d.ii
<b>C.9.e. Public Outreach</b>								
<b>Goal:</b> To develop and implement public outreach related to reducing pesticide use and encouraging private landscaper irrigation management that minimizes pesticide runoff.								
<b>Actions –</b>								
e.1. Provide staff support for the Regional OWOW Store Partnership project and conduct the local IPM Store Partnership Program at 22-25 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					<i>Ongoing</i>	e.ii (1)

<sup>1</sup> 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.

### Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
e.2. In the Annual Report, provide a reference to the OWOW report that summarizes regional point-of-purchase outreach actions.	X	X					<b>9/30/2021</b>	e.iii
e.3. Conduct outreach to structural pest control professionals, on a local, countywide or regional level, as appropriate.	X	X					<i>Ongoing</i>	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	X					<b>9/30/2021</b>	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					<i>Ongoing</i>	e. ii (3)
e.6. 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.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					<b>9/30/2021</b>	e.iii
<b>C.9.f. Track and Participate in Relevant Regulatory Processes</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
f.1. Track and participate in CASQA’s True Source Control Subcommittee and as necessary, assist 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					<i>Ongoing</i>	f.i

<sup>1</sup> 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.

### Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
f.2. Report participation in relevant regulatory processes and list information submitted. Participation may be an individual or regional effort.	A	A					<b>9/30/2021</b>	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					<i>Ongoing</i>	f.ii

<sup>1</sup> 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.

### Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.10.a. Trash Reduction Requirements</b>								
<b>Goals:</b> Permittees shall implement trash load reduction control actions to meet the goal of 100% trash load reduction or no adverse impact to receiving waters from trash by July 1, 2022.								
<b>Actions –</b>								
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>Ongoing</i>	a
a.2. Install and/or maintain mandatory minimum full capture systems.	A	X					<i>Ongoing</i>	a.ii
a.3. Delineate and map drainage/treatment areas for all full capture systems.	A	X					<i>Ongoing</i>	a.ii
<b>C.10.b. Demonstration of Trash Reduction Outcomes</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
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					<i>Ongoing</i>	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					<i>Ongoing</i>	b.i.a-b
b.3. Certify that full capture systems are operated and maintained consistent with the full capture definition.		X					<b>9/30/2021</b>	b.i.c

<sup>1</sup> 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.

**Provision C.10 - Trash Load Reduction**

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
b.4. Maintain and provide for inspection (upon request) documentation of non-full capture system trash control actions.	A	X					<i>Ongoing</i>	b.ii
b.5. Perform Visual Assessment of outcomes of other trash management actions to extent described in C.10.b.ii. Street/sidewalk and area-based assessments are included in this task.	X	A					<i>Ongoing</i>	b.ii.b
b.6. Maintain a cloud-based data management system to manage on-land assessment information.	X						<i>Ongoing</i>	b.ii.b
b.7. Conduct one visual assessment training workshop for Co-permittee staff.	X	A					<i>TBD</i>	b.ii.b
b.8. Implement (as applicable) actions to reduce trash at the source (e.g., product-based ordinances).		X					<i>Ongoing</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					<b>9/30/2021</b>	b.iv
b.10. Facilitate funding partnerships between Co-permittees and Caltrans, with an emphasis on streamlining the process and making opportunities more widely available.	X	A					<i>Ongoing</i>	

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### Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.10.c. Trash Hot Spot Selection and Cleanup</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
c.1. Develop and distribute guidance on collecting hot spot information	X						<i>3/15/2021</i>	c
c.2. Cleanup Trash at Trash Hot Spots to a level of "no visual impact" at least one time per year.		X					<i>Ongoing</i>	c.i
c.3. Submit trash assessment data to SCVURPPP staff.		X					<i>8/13/2021</i>	
c.4. Populate FY 20-21 annual report tables with Co-permittee trash assessment data.	X						<i>8/13/2021</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> <b>9/30/2021</b>	c.iii
<b>C.10.d. Trash Load Reduction Plans</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
d.1. Update long-term plans (as necessary) to document revisions.	A	X					<i>Ongoing</i>	d
d.2. Revise baseline trash generation maps as necessary.	X	A					<b>9/30/2021</b>	d
<b>C.10.e. Optional Trash Load Reduction Offset Opportunities</b>								
<b>Goal:</b> Additional actions taken to offset provision C.10.a trash load percent reduction requirement.								

<sup>1</sup> 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.



## Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>Actions –</b>								
e.1. Conduct additional creek and shoreline cleanups (as applicable).		X					<i>Ongoing</i>	e.i
e.2. Implement a Direct Trash Discharge Control Program (as applicable).		X					<i>Ongoing</i>	e.ii
<b>C.10.f. Reporting</b>								
<b>Goal:</b> To report all trash reduction activities in Annual Report each year.								
<b>Actions –</b>								
f.1. Summarize trash control actions within each TMA including types, levels, areas, whether new or ongoing, and initiation date.	A	X					<b>9/30/2021</b>	f.i
f.2. Provide updated maps (generation, TMA, full capture, hot spot) upon request by Executive Officer.	X	X					<i>Ongoing</i>	f.ii
f.3. Provide any revised maps (generation, TMA, full capture, hot spot) in 2021 Annual Report.	X	X					<b>9/30/2021</b>	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					<b>9/30/2021</b>	f.iv
f.5. Report trash reductions associated with full capture systems and other actions demonstrated to-date.	A	X					<b>9/30/2021</b>	f.v
f.6. Report volumes removed for current and previous 5 years hot spot cleanups.	A	X					<b>9/30/2021</b>	f.vii
f.7. Report summary descriptions of additional cleanups where offsets claimed.	A	X					<b>9/30/2021</b>	f.viii
<b>Zero Litter Initiative (ZLI)</b>								
<b>Goal:</b> Actively participate in ZLI activities.								
<b>Actions –</b>								
1. Participate in monthly steering and outreach committee meetings.	X	A					<i>Ongoing</i>	

<sup>1</sup> 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.

**Provision C.10 - Trash Load Reduction**

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
2. Coordinate ZLI webinar series on trash management and assessment.	X	A					<i>Ongoing</i>	
3.d Coordinate with CalTrans and VTA via the ZLI.	X	X					<i>Ongoing</i>	

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**Provision C.11 - Mercury Controls**

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.11.a. Implement Control Measures to Achieve Mercury Load Reductions</b>								
See C.12.a.								
<b>C.11.b. Assess Mercury Load Reductions from Stormwater</b>								
See C.12.b.								
<b>C.11.c. Plan and Implement Green Infrastructure to reduce mercury loads</b>								
See C.12.c.								
<b>C.11.d. Prepare Implementation Plan and Schedule to Achieve TMDL Allocations</b>								
See C.12.d.								
<b>C.11.e. Implement a Risk Reduction Program</b>								
See C.12.h.								

<sup>1</sup> 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.

### Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.a. Implement Control Measures to Achieve PCBs Load Reductions.</b>								
<b>Goals:</b> To implement PCBs source and treatment control measures and pollution prevention strategies to achieve PCBs load reductions								
<b>Actions –</b>								
a.1. Conduct property investigation and abatement projects in collaboration with applicable Co-permittees.	X	A					<i>Ongoing</i>	
a.2. Coordinate with the City of San Jose, City of Sunnyvale, City of Santa Clara and other Co-permittees and the Water Board staff on source property referrals as needed.	X	A					<i>Ongoing</i>	
a.3. Develop an updated list of priority watersheds and control measures implemented to-date per provision C.12.a.	X	A					<b>Annually 9/30/2021</b>	a.iii
<b>C.12.b. Assess PCBs Load Reductions from Stormwater</b>								
<b>Goal:</b> 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).								
<b>Actions –</b>								
b.1. Calculate load reductions and develop draft and final load reduction reports for submittal to the Water Board.	X	A					<b>Annually 9/30/2021</b>	b.iii
b.2. Submit for Executive Officer approval any refinements to the measurement and estimation methodologies to assess PCBs load reductions in the subsequent Permit.	A	A					<i>Ongoing</i>	b.iii

<sup>1</sup> 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

### Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.c. Plan and Implement Green Infrastructure to reduce PCBs loads</b>								
<b>Goal:</b> To implement green infrastructure projects during the term of the Permit to achieve PCBs load reduction performance criteria in Table 12.2 by June 2020.								
<b>Actions –</b>								
c.1. Implement and track public GSI projects and track the implementation of private GSI projects.	A	X					<i>Ongoing</i>	c.ii

<sup>1</sup> 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

### Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.e. Evaluate the Presence of PCBs in Caulks/Sealants used in Storm Drains or Roadway Infrastructure</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
e.1. Follow up with Water Board staff on potential outcomes of the regional study.	X	A					<i>Ongoing</i>	e.ii
<b>C.12.f. Manage PCB-Containing Materials and Wastes during Building Demolition Activities so that PCBs don't enter the MS4</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
f.1. Conduct one meeting of Co-permittees to discuss initial implementation and associated challenges	X	A						f.ii
f.2. Continue full implementation of the PCBs in building demolition control program.	A	X					<i>Ongoing</i>	f.ii
f.3. Continue implementation of an assessment methodology and data collection program to quantify in a technically sound manner PCBs loads reduced through implement of the protocol for controlling PCBs during demolition of applicable structures.	A	A					<i>Ongoing</i>	f.ii

<sup>1</sup> 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

### Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
f.5 Provide documentation of (a) applicable structures that applied for a demolition permit during the reporting year, and (b) a running list of the applicable structures that applied for a demolition permit (since the data the PCBs control protocol was implemented) that had material(s) with PCBs at 50 ppm or greater, with the address, demolition date, and brief description of PCBs control method(s) used.	A	X					<b>9/30/2021</b>	f.iii

<sup>1</sup> 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

### Provision C.12 - Polychlorinated Biphenyls (PCBs) Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.g. Fate and Transport Study of PCBs – Urban Runoff Impacts of Bay Margins</b>								
<b>Goal:</b> To conduct studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas.								
<b>Actions –</b>								
g.1. Actively participate and track Bay Margins monitoring occurring through the RMP.	X	A					<i>Ongoing</i>	g.ii
<b>C.12.h. Implement a Risk Reduction Program</b>								
<b>Goal:</b> To conduct an ongoing risk reduction program to address public health impacts of PCBs in San Francisco Bay/Delta fish.								
<b>Actions –</b>								
h.1. 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					<i>Ongoing</i>	h.ii
h.3 Report annually on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.	X	A					<b>9/30/2021</b>	h.iii
<b>Coordinate with CalTrans on Load Reduction Allocation Sharing Scheme</b>								
Work with CalTrans on identifying projects in the Santa Clara Valley that will assist in the reduction of mercury and other pollutants 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

<sup>1</sup> 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

## Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.13.a. Manage Waste Generated from Cleaning and Treating of Copper Architectural Features, Including Copper Roofs, during Construction and Post-Construction.</b>								
<b>Goals:</b> 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.								
<b>Actions –</b>								
a.1. Require the use of appropriate BMPs when issuing building permits or equivalent process.		X					<i>Ongoing</i>	a.ii (1)
a.2. Educate installers and operators on appropriate BMP implementation.	A	X					<i>Ongoing</i>	a.ii (2)
a.3. Enforce against non-compliance as needed.		X					<i>Ongoing</i>	a.ii (3)
a.4. Report annually on permitting and enforcement activities.	A	X					<b>9/30/2021</b>	a.iii (3)
<b>C.13.b. Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals</b>								
<b>Goal:</b> Establish the legal authority to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals.								
<b>Actions –</b>								
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					<i>Ongoing</i>	b.ii
b.2 Report annually on enforcement activities.	A	X					<b>9/30/2021</b>	b.iii.(3)

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**Provision C.13 - Copper Controls**

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.13.c. Industrial Sources</b>								
<b>Goal:</b> 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.								
<b>Actions –</b>								
c.1. Identify facilities likely to use copper or have sources of copper.	A	X					<i>Ongoing</i>	c.ii.(1)
c.2. Include facilities likely to use copper or have sources of copper in your inspection program plans.		X					<i>Ongoing</i>	c.ii.(1)
c.3. Educate inspectors to identify copper sources and proper BMPs.	A	X					<i>Ongoing</i>	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					<i>Ongoing</i>	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					<b>9/30/2021</b>	c.iii

<sup>1</sup> 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.



## Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.15.a. Exempted Non-stormwater Discharges (Exempted Discharges)</b>								
<b>Goals:</b> Have the legal authority, training, and outreach to address new C.15. requirements, and continue to implement discharge prohibitions.								
<b>Actions –</b>								
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					<i>Ongoing</i>	a.i
<b>C.15.b. Conditionally Exempted Non-Stormwater Discharges</b>								
<b>Goal:</b> Implement BMPs, notification, monitoring and reporting requirements for categories of conditionally exempted non-stormwater discharges regulated under C.15.b.								
<b>Actions –</b>								
b.1. 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					<i>Ongoing</i>	b.i.
b.2. 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					<i>Ongoing</i>	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					<i>Ongoing</i>	b.v.
b.4. 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					<i>Ongoing</i>	b.vi

<sup>1</sup> 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.



## Provision C.15 - Exempted and Conditionally Exempted Discharges

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWPA	FY 21-22				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
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					<i>Ongoing</i>	b.vi
<b>General Assistance</b>								
<b>Goal:</b> Provide general assistance and guidance in implementing Provision C.15.								
<b>Actions-</b>								
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					<i>Ongoing</i>	b.i-b.vi
2. Provide guidance on implementation of the Water Utility O&M Discharge Pollution Prevention Plan and implementation of the State Drinking Water System Discharges General Permit.	X	A					<i>Ongoing</i>	
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					<b>3/1/2022</b>	

<sup>1</sup> 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.