



# FY2022-23 WVCWA Work Plan



## Introduction

Actions described in this Work Plan are those required by the Municipal Regional Stormwater NPDES Permit (MRP 3.0) for the San Francisco Bay Area. The Work Plan provides implementation tasks for West Valley Clean Water Authority (WVCWA) and the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPP) for fiscal year (FY) 2022-2023. The Work Plan was developed in coordination with the development of WVCWA's FY 2022-2023 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 WVCWA and collectively through SCVURPPP area-wide activities. The Work Plan was developed by the WVCWA and the SCVURPPP to include new, expanded or redirected efforts required by MRP 3.0, which is scheduled for adoption on May 11, 2022 and will become effective July 1, 2022. The Work Plan will be reviewed and modified, as needed, after MRP 3.0 is adopted.

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 WVCWA or SCVURPPP. The implementation schedules are shown by shaded cells for the four quarters of FY 2022-2023. Completion dates presented in **bold** are due dates specified in MRP 3.0, and dates presented in *italics* are internal due dates based on the permit-required completion dates. Tasks with **red** text are new implementation tasks that address anticipated new requirements in FY 2022-23.

## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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>9/30/2022</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>9/30/2022</b>	c.iii.

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.2. Red text = new task for FY 22-23.

## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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. Since a Rural Public Works BMP training was conducted during FY 21-22, a training will not be held in FY 22-23.	X	X					N/A	e.ii.(4)
e.4. Report implementation and compliance with these BMPs in each Annual Report.	A	X					<b>9/30/2022</b>	e.iii

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## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 August 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>9/30/2022</b>	f.iii.(1)
f.5. Update corporation yard SWPPPs, as needed, before submitting in 2023 Annual Report	A	X					<b>6/30/2023</b>	f.iii.(2)
<b>C.2.g. 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>								
g.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>	g.ii
g.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>	g.ii

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## Provision C.2 - Municipal Operations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.2.h. Staff Training</b>								
<b>Goal:</b> Provide focused training for municipal maintenance staff at least once within 5 year permit term, as required by the MRP								
<b>Actions –</b>								
h.1. Provide training to municipal maintenance staff at least once within permit term on relevant topics.	A	X					<b>Annually</b>	h.ii
h.2. Include training dates, training topics and number/percentage of municipal maintenance staff attending the training in each Annual Report	A	X					<b>9/30/2022</b>	h.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. Facilitate information sharing on BMPs used, in preparation for the 2024 requirement to provide copies/access to BMPs used.	X						<i>Ongoing as needed</i>	a.,b.,c.,e.
2. Assist with pesticide tracking and reporting through the Municipal 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	WVCWA	FY 22-23				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. Conduct annual workshop on C.3 Implementation.	X	A					<b>6/30/2023</b>	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. Prepare updates to the C.3 Stormwater Handbook as needed for consistency with the GSI Handbook, anticipated MRP 3.0 requirements, and as identified by the C3PO AHTG, and prepare updates to outreach flyers as needed.	X	A					<i>12/31/2022</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 BAMS Collaborative Development Committee (assume 4 meetings during FY 22-23).	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>9/30/2022</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, Special Project criteria, and other technical support and presentations.	X						<i>Ongoing</i>	b.i. & ii.
b.4. Assist with the C3PO AHTG and work group meetings and action items.	X						<i>Ongoing</i>	

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			Q1	Q2	Q3	Q4		
<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.i.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>9/30/2022</b>	c.3.e.vi.
<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>9/30/2022</b>	f.iii

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			Q1	Q2	Q3	Q4		
f.2. Conduct 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						<i>9/30/2022</i>	
<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.1.1 Participate in a regional project to update the BAHM and the BAHM User Manual and conduct training.	X						<b>6/30/2023</b>	g.i.
g.2. Report information on approved HM Projects per C.3.b.v. and C.3.g.iv.	A	X					<b>9/30/2022</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>9/30/2022</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.
h.4. Provide training for O&M inspectors as part of the C.3 or other workshops.	X	A					<i>12/30/2022</i>	h.ii.
h.5. Provide updated guidance on O&M for LID treatment measures as needed.	X	A					<i>Ongoing</i>	h.ii.

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## Provision C.3 - New Development and Redevelopment

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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>9/30/2022</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 with SWRP-related information and products.	X	A					<i>On-going</i>	C.3.j.
j.4. GSI Tools Development: Develop a work plan and framework for how the Stormwater Treatment Measure (STM) Data Portal can be further developed and coordinated with existing local data management systems to help Co-permittees fulfill the MRP 3.0 requirements for an Asset Management Plan.	X	A					<b>12/30/2022</b>	C.21.b
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>6/30/2023</b>	C.3.j.ii.(1)(d)

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
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>	C.3.j.ii.(1)(g)(i)&(iii)
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 (as budget allows).	X	A					<b>6/30/2023</b>	C.3.j.ii.(1)(g)(ii)
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. Participate in the Water Board's Technical Working Group (TWG) for Long-Term GSI Implementation (C.3.j.ii.(4)) at least biannually, and help organize and attend a regional work group for development of a proposal for incorporating tree runoff reduction and tree-based stormwater treatment systems into LID/GSI implementation (C.3.d.iv.) at least biannually.	A	A					<i>Ongoing</i>	C.3.j.iv.
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.	X	A					<b>6/30/2023</b>	C.3.j.ii.(1)(e), C.3.j.v.,C.21.b
j.17. Funding Options for GSI Implementation: Continue to provide Co-permittees with information on new legislation and grant opportunities and requirements related to GSI funding. Assist with grant applications as needed.	X	A					<b>6/30/2023</b>	C.3.j.ii.(1)(c)
<b>j.19. Assistance with Implementation of GSI Plans and Projects: Implement a scope of work developed in FY 21-22 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.</b>	<b>X</b>	<b>X</b>					<b>6/30/2023</b>	<b>C.3.j.ii.(2)</b>

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 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>9/30/2022</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.

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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>9/30/2022</b>	d.iii
e.3. Update or develop outreach materials (as needed).	X	A					<i>Ongoing</i>	b & d

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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)
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)

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.5. Red text = new task for FY 22-23.

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
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; and 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>9/30/2022</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 Annually 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)
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)

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.5. Red text = new task for FY 22-23.

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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 the 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

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## Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 C.6 requirements, and continue to implement.								
<b>Actions -</b>								
a.1. Implement current/revise legal authority.		X					<i>Ongoing</i>	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					<i>Ongoing</i>	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					<i>As needed</i>	

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## Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 and 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					<i>Ongoing</i>	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					<i>Ongoing</i>	d.ii.(1)
d.3 Verify sites disturbing one acre or more of soil have filed a NOI.		X					<i>Ongoing</i>	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>(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>9/30/2022</b>	e.iii

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### Provision C.6 - Construction Site Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</b>	f.iii

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.7.a. 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>								
a.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
a.2. Summarize Campaign activities and submit in Annual Report each year.	X	A					<b>9/30/2022</b>	b.iii
a.3. Provide funding to support the City of San Jose's outreach partnership with San Jose Earthquakes and/ or the San Jose Sharks.	X						<i>Ongoing</i>	b.ii
a.4. Develop Request for Proposal (RFP) for Advertising/Media Relations subconsultant and conduct RFP process with MC/WEO AHTG. Assume that RFP process will be completed in late 2022 and that current contract with current subconsultant will be extended for 6 months (July – December 2022) during the RFP process.	X	A					<i>December 2022</i>	b.ii
<b>C.7.b. 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>								
b.1. Maintain and publicize Co-permittee phone numbers for information on stormwater issues.	A	X					<i>Ongoing</i>	c.ii (1)
b.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)
b.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	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.7.c. 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>								
c.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.
c.2. Continue to support creek cleanups by providing funding to advertise two creek cleanup events (e.g., Coastal Cleanup Day and National River Cleanup Day).	X	A					<i>Ongoing</i>	d.i., ii.
c.3 Fund the San Francisco Bay National Wildlife Refuge at Alviso to conduct the Watershed Watchers Program.	X						<i>Ongoing</i>	
c.4. Develop and print brochures and other outreach materials as needed. Coordinate with Admanor as needed.	X	A					As needed	
c.5. In the Annual Report, provide details of each outreach event, data on participation, and assess the effectiveness of efforts.	X	X					<b>9/30/2022</b>	d.iii.
<b>C.7.d. 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>								
d.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.
d.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.

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## Provision C.7 - Public Information and Outreach

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
d.3 Host and maintain WMI website.	X	A					<i>Ongoing</i>	e.i., ii.
d.4. In each Annual Report, provide the level of effort and describe support given, activities implemented, and evaluation of effectiveness.	X						<b>9/30/2022</b>	e.iii.
<b>C.7.e. 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>								
e.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.
e.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.
e.3. In each Annual Report, provide the level of effort, spectrum of children reached, methods used and effectiveness evaluation.	X	X					<b>9/30/2022</b>	f.iii.
<b>C.7.f. 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>								
f.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	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.7.g. Tracking and Reporting</b>								
<b>Goal:</b> Prepare for new C.7 tracking and reporting requirements in MRP 3.0.								
<b>Actions --</b>								
g.1. Create a tracking table or spreadsheet to electronically track outreach efforts in the format requested in MRP 3.0 C.7.g.	X	A					<i>December 2022</i>	g.i
g.2. Track outreach efforts in the tracking table or spreadsheet.	X	X					<i>Ongoing</i>	g.i
<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>	

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 BAMSC 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 <b>LID effectiveness, trash receiving water</b> , pesticides/toxicity, and pollutants of concern monitoring programs required by MRP 3.0.	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 monitoring data collected in FY 21-22 (i.e., creek status, POC, SSID, and pesticide/toxicity data) into the Program's information management system	X						<i>Ongoing</i>	
b.2. Conduct quality assurance procedures on all monitoring data collected.	X						<i>Ongoing</i>	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	WVCWA	FY 22-23				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>	
<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 Co-permittees, actively participate in RMP steering and technical review committees, and workgroups	X	A					<i>Ongoing</i>	c.
<b>C.8.d. Low Impact Development (LID) Monitoring</b>								
<b>Goal:</b> Plan for the first year of annual LID monitoring as outlined in the Draft TO provision C.8.d								
<b>Actions –</b>								
d.1. <u>LID Monitoring Plan &amp; QAPP</u> Prepare for and develop one draft, one revised draft (for Technical Advisory Group review), one final draft (for Executive Officer approval), and one final LID monitoring plan that addresses the requirements in the Draft TO. Develop one draft, one revised draft (for Technical Advisory Group review), one final draft (for Executive Officer approval), and one final QAPP that addresses the requirements in the Draft TO. Task includes finalization of sites, sampling locations and strategies, and laboratories.	X	A					<b>1/1/2023</b>	d.i and d.vi
d.2. <u>LID Monitoring Technical Advisory Group (TAG)</u> Assist in the formation and convening of a TAG to review and make recommendations regarding the LID Monitoring Plans, QAPPs, and their implementation.	X	A					<i>Ongoing</i>	d.ii

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<u>d.3. LID Monitoring</u> Assumes, consistent with the Draft TO, that LID monitoring will begin in FY 2023-24.	X	A					<b>10/1/2023</b>	d.iii, iv, v
<b>C.8.e. Trash Monitoring</b>								
<b>Goal:</b> Plan for and implement the first year of annual trash monitoring as outlined in the Draft TO provision C.8.d								
<b>Actions –</b>								
<u>e.1. Initial Trash Monitoring Plan &amp; QAPP</u> Prepare for and develop one draft, one revised draft (for Technical Advisory Group review), and one final trash monitoring plan that addresses the requirements in the Draft TO. Develop one draft, one revised draft (for Technical Advisory Group review), and one final QAPP that addresses the requirements in the Draft TO.	X	A					<b>9/30/2022</b>	e.v.(1)
<u>e.2. Trash Technical Advisory Group (TAG)</u> Assist in the formation and convening of a TAG to review and make recommendations regarding the Trash Monitoring Plans, QAPPs, and their implementation.	X	A					Ongoing	e.iv
<u>e.3. Trash Monitoring</u> Plan for and implement monitoring described in the LID monitoring plan, consistent with the requirements in the Draft TO. Includes the costs of designing and purchasing three trash monitoring netting systems and the costs of installing the devices on stormwater outfalls for monitoring. Also includes preparation for and conducting monitoring, quantification and characterization resulting from three storm events. The budget does not include costs associated with environmental permitting.	X	A					<b>10/1/2022</b>	e.ii, iii
<u>e.4. Trash Annual Progress Report</u> Prepare for and develop one draft and one final Trash Progress Report that addresses trash monitoring conducted during the previous water year and monitoring that will be conducted in the current and forthcoming water years.	X	A					<b>3/21/2023</b>	e.v.(2)

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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>								
f.1. Conduct Water Year 2023 POC Monitoring	X	A					<i>Ongoing</i>	f.ii, iii, iv
f.2. Participate in the RMP's Emerging Contaminants Work Group to ensure that POC Monitoring requirements associated with emerging contaminants (e.g., vehicle contaminants, PFAS, alternative flame retardants, bisphenol plastic additives, ethoxylated surfactants) are addressed.	X	A					<i>Ongoing</i>	f.ii, iii
f.3. Financially contribute to the RMPs Emerging Contaminants Monitoring Strategy.	X	X					<b>Annually</b>	f.iii
<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 2022 dry season pesticides (sediment) and toxicity monitoring (water and sediment).	X	A					<b>Summer 2022</b>	g.i, ii
g.2. If storm conditions are favorable, conduct wet weather pesticides (water) and toxicity (water) monitoring.	X	A					<b>Winter 2023</b>	g.iii

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## Provision C.8 - Water Quality Monitoring

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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>3/31/2023</b>	h.ii
h.2. Develop and submit Urban Creeks Monitoring Report (UCMR) to Water Board.	X	A					<b>3/31/2023</b>	h.iii
h.3. As part of UCMR, develop and submit LID Monitoring Status Report to Water Board.	X	A					<b>3/31/2023</b>	h.iii.(1)
h.4. As part of UCMR, develop and submit Pesticides and Toxicity Monitoring Status Report to Water Board.	X	A					<b>3/31/2023</b>	h.iii.(2)
h.5. Develop and submit POC Monitoring Report describing WY 2022 accomplishments and WY 2023 allocation of POC sampling effort							<b>3/31/2023</b>	h.iv
h.6. Comprehensive Bioassessment Final Report - Consistent with the Draft TO, develop and submit a comprehensive analysis of all bioassessment monitoring conducted during MRP 1.0 and 2.0 for Water Years 2012-21.	X	A					<b>3/31/2023</b>	h.vi

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.8. Red text = new task for FY 22-23.



## Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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); carbamates (e.g., carbaryl and aldicarb), and <b>neonicotinoids (e.g., imidacloprid, acetamiprid, and dinotefuran)</b> .	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>9/30/2022</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>9/30/2022</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. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.9. Red text = new task for FY 22-23.



## Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</b>	b.ii.(1)
b.3 In the Annual Report, briefly describe the type of training (tailgate, external agency etc.)	A	X					<b>9/30/2022</b>	b.ii.(1)
b.4. Compile training materials (e.g., course outline, date, attendees) for submittal to Water Board upon request.	A	X					<i>As needed</i>	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>9/30/2022</b>	c.iii

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.9. Red text = new task for FY 22-23.

## Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.9. Red text = new task for FY 22-23.



## Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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>9/30/2022</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>9/30/2022</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 CASQA efforts, that are 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

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### Provision C.9 - Pesticides Toxicity Control

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.9. Red text = new task for FY 22-23.

## Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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 90% trash load reduction by June 30, 2023; and 100% trash load reduction or no adverse impact to receiving waters from trash by June 30, 2025.								
<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					<i>Ongoing</i>	b.ii.a
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

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.10. Red text = new task for FY 22-23.

## Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
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.iii.b
b.6. Maintain a cloud-based data management system to manage on-land assessment information.	X						<i>Ongoing</i>	b.iii.b
b.7. Implement (as applicable) actions to reduce trash at the source (e.g., product-based ordinances).		X					<i>Ongoing</i>	b.v
b.8. 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>9/30/2022</b>	b.v
b.9. 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>	
<b>C.10.c. Trash Hot Spot Selection and Cleanup (MRP 2.0)</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. Submit FY 21-22 trash assessment data to SCVURPPP staff.		X					<i>8/12/2022</i>	
c.2. Populate FY 21-22 annual report tables with Co-permittee trash assessment data.	X						<i>8/12/2022</i>	MRP 2.0 C.10.c.iii
c.3. Provide on-going management of the hot spot database, compile assessment data and develop summary report.	X	A					<b>9/30/2022</b>	MRP 2.0 C.10.c.iii

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.10. Red text = new task for FY 22-23.

## Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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. Continue to provide each Co-permittee with a more in-depth evaluation of trash control measure options to achieve anticipated MRP 3.0 trash reduction goals. As part of this effort, provide guidance and assist Co-permittees on collecting data to identify trash sources and inform control measure selection, updating tracking and reporting formats, and updating Long-Term Trash Load Reduction Plans.	X	A					<i>Ongoing</i>	d
d.2. Revise baseline trash generation maps as necessary.	X	A					<b>9/30/2022</b>	d
<b>C.10.e. Trash Reduction Impracticability Report</b>								
<b>Goal:</b> To describe conditions under which it is impracticable to control trash via full trash capture devices or equivalent actions.								
<b>Actions –</b>								
e.1. <span style="color: red;">Develop a Trash Impracticability Report for SCVURPPP Co-permittees, or develop a region-wide report as appropriate, that includes a process for both evaluating impracticability and implementing partial benefit actions to the maximum extent practicable.</span>	<span style="color: red;">X</span>	<span style="color: red;">A</span>					<span style="color: red;"><b>3/31/2023</b></span>	e
<b>C.10.f. Optional Trash Load Reduction Offset Opportunities</b>								
<b>Goal:</b> Additional actions taken to offset provision C.10.a trash load percent reduction requirement.								
<b>Actions –</b>								
f.1. Conduct additional creek and shoreline cleanups (as applicable).		X					<i>Ongoing</i>	f.i
f.2. Implement a Direct Trash Discharge Control Program (as applicable).		X					<i>Ongoing</i>	f.ii

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.10. Red text = new task for FY 22-23.

## Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.10.g. Reporting</b>								
<b>Goal:</b> To report all trash reduction activities in Annual Report each year.								
<b>Actions –</b>								
g.1. Summarize trash control actions within each TMA including types, levels, areas, whether new or ongoing, and initiation date.	A	X					<i>Ongoing</i>	g.i
g.2. Provide updated maps (generation, TMA, full capture) upon request by Executive Officer.	X	X					<b>9/30/2022</b>	MRP 2.0 C.10.f.ii
g.3. Provide any revised maps (generation, TMA, full capture) in 2022 Annual Report.	X	X					<b>9/30/2022</b>	MRP 2.0 C.10.f.iii
g.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>9/30/2022</b>	MRP 2.0 C.10.f.iv

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.10. Red text = new task for FY 22-23.

### Provision C.10 - Trash Load Reduction

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
g.5. Report trash reductions associated with full capture systems and other actions demonstrated to-date.	A	X					<b>9/30/2022</b>	MRP 2.0 C.10.f.v
g.6. Report volumes removed for current and previous 4 years hot spot cleanups.	A	X					<b>9/30/2022</b>	MRP 2.0 C.10.f.vii
g.7. Report summary descriptions of additional cleanups where offsets claimed.	A	X					<b>9/30/2022</b>	MRP 2.0 C.10.f.viii
g.8. Consistent with the MRP 3.0 Draft TO, develop and submit a programmatic report for the approval of the Executive Officer, that describes conditions under which it is impracticable to control trash via full trash capture devices or equivalent actions.	X	X					<b>3/31/2023</b>	g.x
g.9 Consistent with the MRP 3.0 Draft TO, Co-permittees unable to attain the 90 percent mandatory trash reduction compliance benchmark by June 30, 2023, via full trash capture, or equivalent, shal submit a notice of noncompliance pursuant to Provision C.23.c.	A	X					<b>6/30/2023</b>	g.vii
<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>	
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>	

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.10. Red text = new task for FY 22-23.



## Provision C.11 - Mercury Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.11.a. Assess Mercury Load Reductions from Stormwater</b>								
See C.12.a.								
<b>C.11.b. Program for Source Property Identification and Abatement</b>								
See C.12.b.								
<b>C.11.c. Program for Control Measure Implementation in Old Industrial Areas</b>								
See C.12.c.								
<b>C.11.d. Mercury Collection and Recycling Implemented throughout the Region</b>								
<b>Goal:</b> Promote, facilitate, and/or participate in collection and recycling of mercury containing consumer products, devices, and equipment (e.g., thermometers, thermostats, switches, bulbs)								
<b>Actions –</b>								
d.1. Continue to promote recycling of mercury-containing products and make efforts to increase effectiveness of these recycling efforts throughout the region.	X	X					<i>Ongoing</i>	d.ii.
d.2. In each of the 2023 through 2026 Annual Reports, report on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of these recycling efforts. Report on the mass of mercury-containing material collected throughout the region along with an estimate of the mass of mercury contained in recycled material using the methodology contained in load.	X	A					<i>FY 2023/24 &amp; FY 2025/26</i>	d.iii.
<b>C.11.e. Plan and Implement Green Stormwater Infrastructure to Reduce Mercury Loads</b>								
See C.12.e.								
<b>C.11.f. Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations</b>								
See C.12.f.								
<b>C.11.g. Fate and Transport Study of Mercury: Urban Runoff Impacts on San Francisco Bay Margins</b>								
See C.12.g.								
<b>C.11.h. 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. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.11. Red text = new task for FY 22-23.



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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.a. Assess PCBs Load Reductions from Stormwater</b>								
<b>Goal:</b> To implement an assessment methodology and data collection program to quantify, in a technically sound manner, PCBs loads reduced through implementation of pollution prevention, source control, and treatment control, green stormwater infrastructure and other measures taken as part of the PCBs control program defined by this provision.								
<b>Actions –</b> None required in FY 22-23								
<b>C.12.b. Program for Source Property Identification and Abatement</b>								
<b>Goal:</b> To continue investigating land areas that may contribute PCBs to MS4s, focusing on old industrial land use areas. For those properties or land areas with elevated PCBs, take actions to abate the PCB sources or refer the properties to the Water Board for follow-up measures.								
<b>Actions –</b>								
b.1. Coordinate with applicable Co-permittees and Water Board staff on source property referrals as needed.	X	A					<i>Ongoing</i>	b.ii.
b.2. Develop workplan and conduct property investigation and abatement projects in collaboration with applicable Co-permittees.	X	A					<i>Ongoing</i>	b.ii.
b.3 Develop an updated list of priority watersheds and control measures implemented.	X	A					<b>9/30/2022</b>	b.iii.(1)
<b>C.12.c. Program for Control Measure Implementation in Old Industrial Areas</b>								
<b>Goal:</b> To implement treatment control measures, stormwater diversion to wastewater treatment facilities, redevelopment, or other control measures to achieve PCBs load reductions. Control measures to be implemented in old industrial land uses or other areas with moderate to high PCBs and address 664 acres or result in a 121 grams/yr PCBs load reduction.								
<b>Actions –</b>								
c.1 Implement treatment control measures, stormwater diversion to wastewater treatment facilities, redevelopment (provided GSI is implemented in compliance with Provision C.3.b), or other control measures to address PCBs and mercury contributions from old industrial areas.	A	X					<i>Ongoing</i>	c.ii.
c.2. Submit plans and schedules for implementing control measures to address old industrial areas.	X	A					<b>9/30/2022</b>	c.iii.(1)

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.12. Red text = new task for FY 22-23.





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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.d. Program for Controlling PCBs from Bridges and Overpasses</b>								
<b>Goal:</b> To implement a Caltrans specification (to be developed through a proposed requirement in Caltrans stormwater permit) to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing material in bridge roadway expansion joints.								
<b>Actions –</b>								
Implement a Caltrans specification to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing material in bridge roadway expansion joints.	A	X					<i>12/31/2022 or 6 months after availability of spec</i>	d.i.
d.1. Develop and include a description of the Caltrans specification for managing PCBs-containing materials in bridge or roadway expansion joints during roadway replacement or repair (if available) in the Program's 2022 Annual Report.	X	A					<b>9/30/2022</b>	d.iii.(1)
d.2. Submit an inventory of bridges in Co-permittee jurisdictional areas that includes bridge ownership and the bridge roadway replacement schedule in the Program's 2022 Annual Report.	X	A					<b>9/30/2022</b>	d.iii.(2)
d.3. Develop guidance to assist Co-permittees in implementing the Caltrans specification.	X	A					<i>12/30/2022</i>	d.ii.
d.4. Assist Co-permittees in tracking and documenting the use of the Caltrans specification, and reporting the use of the specification and an estimate of the volume of material managed and total PCBs mass load reduced resulting from implementation of the specification.	X	A					<i>Ongoing;</i> <b>9/30/2022</b>	d.iii.(3)

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.12. Red text = new task for FY 22-23.



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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.e. Program for Controlling PCBs from Electrical Utilities</b>								
<b>Goal:</b> (1) develop and implement a program to manage PCBs in oil-filled electrical equipment (OFEE) for municipally-owned electrical utilities in the MRP program area and (2) collaborate with the Water Board to determine PCBs loadings in OFEE from non-municipally owned electrical utilities.								
<b>Actions –</b>								
e.1 The Cities of Palo Alto and Santa Clara will: 1) develop or improve standard operating procedures to respond to, cleanup, and report spills and releases from municipally owned Oil Filled Electrical Equipment (OFEE) and fully implement these procedures; 2) develop and implement a plan to maintain and upgrade municipally owned OFEE; and 3) document the PCBs loads avoided through existing and ongoing OFEE removal and replacement programs.	A						<i>Ongoing;</i> <b>9/30/2022</b>	e.ii. & e.iii.(4)
e.2. Coordinate communications and the development and submittal of improved standard operating procedures (SOPs) by the Cities of Santa Clara and Palo Alto.	X						<i>Ongoing</i>	e.ii.
e.3. Document and report on plans to maintain and upgrade municipally owned OFEE and accounting for the loads avoided via the implementation of these new SOPs.	X						<i>Ongoing</i>	e.ii.
e.4. Track the Water Board’s request for information and submittal of information by non-municipally owned electric utilities.	X						<i>Ongoing</i>	e.ii.
<b>C.12.f. Plan and Implement Green Infrastructure to Reduce PCBs Loads</b>								
<b>Goal:</b> To implement green stormwater infrastructure (GSI) projects during the term of the Permit consistent with implementing requirements in Provision C.3.j.								
<b>Actions –</b> see C.3.j.								

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.12. Red text = new task for FY 22-23.

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.g. Manage PCB-Containing Materials and Wastes during Building Demolition Activities</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.								
<b>Actions –</b>								
g.1. Participate in a project of regional benefit to complete the following tasks: 1) update the regional protocol and guidance developed during MRP 2.0 to ensure that buildings are tested for PCBs-containing material prior to issuing a demolition permit; and 2) update the protocol and guidance to require demolition contractors to provide notification to the Co-permittees, the Water Board, and USEPA at least one week before any demolition is to occur.	X	A					<i>Ongoing</i>	g.ii.
g.2. Update local guidance and conduct training for SCVURPPP Co-permittees to ensure that effective construction pollutant controls are used to prevent discharges of PCBs-containing materials into the MS4.	X	A					<i>Ongoing</i>	g.ii.
g.3. Continue to assist with the implementation of the protocol including conducting two POC AHTG meetings that focus on the PCBs in building demolition program and provide the opportunity to discuss implementation and associated challenges.	X	A					<i>Ongoing</i>	g.ii.
g.4 Compile data from Co-permittees on the implementation of the protocol during previous fiscal years in preparation for inclusion in the Program's FY 2021-22 annual report.	X	A					<i>Ongoing</i>	g.ii.
<b>C.12.h. Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations</b>								
<b>Goal:</b> evaluate the effectiveness of all PCBs control measures and update the 2020 RAA as necessary.								
<b>Actions –</b> None required in FY 22-23								

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.12. Red text = new task for FY 22-23.



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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.12.i. Fate and Transport Study of PCBs – Urban Runoff Impacts on San Francisco Bay Margins</b>								
<b>Goal:</b> To conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas.								
<b>Actions –</b>								
i.1. Track efforts conducted through the Regional Monitoring Program to assist Permittees in complying with this provision, including the implementation of the margins monitoring program by the RMP and the evaluation of Priority Margin Units for PCB fate, transport, and recovery potential.	X						<i>Ongoing</i>	i.i.
<b>C.12.j. 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>								
j.1. Continue to conduct outreach to residents likely to consume locally caught fish including point of purchase outreach at fishing supply stores.	X	A					<i>Ongoing</i>	j.ii.
j.2. Continue posting of educational material on the SCVURPPP and Watershed Watch Campaign websites.	X	A					<i>Ongoing</i>	j.ii.
j.3. Continue providing educational materials and guidance to the Don Edwards San Francisco Bay Wildlife Refuge.	X	A					<i>Ongoing</i>	j.ii.
<b>C.12.k. Coordination with Caltrans</b>								
<b>Goal:</b> To help implement the urban runoff requirements of the PCBs TMDL.								
<b>Actions –</b>								
k.1. Continue to 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 BAMSC as necessary. Trash and green infrastructure considerations will also be included in this task.	X	A					<i>Ongoing</i>	

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## Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</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>9/30/2022</b>	b.iii.(3)

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### Provision C.13 - Copper Controls

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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>9/30/2022</b>	c.iii

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.13. Red text = new task for FY 22-23.

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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				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
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

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.15. Red text = new task for FY 22-23.



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

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<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>3/1/2023</b>	
4. Provide guidance on BMPs for firefighting discharges and continue to participate in the regional Firefighting Work Group to discuss and develop appropriate BMPs during emergency situations.	X	A					<i>Ongoing</i>	b.iii
5. Track and participate in Water Agency Task Force (WATF) activities (as needed) related to implementation of the State Water Board's Drinking Water System Discharge General Permit.	X	A					<i>Ongoing</i>	

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.15. Red text = new task for FY 22-23.





## Provision C.17 - Discharges Associated with Unsheltered Homeless Populations

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.17.a. Permittee Requirements</b>								
<b>Goals:</b> Identify and ensure the implementation of appropriate control measures to address non-stormwater discharges associated with unsheltered homeless populations.								
<b>Actions –</b>								
a.1. Collect and compile information on the locations of unsheltered homeless populations and stormwater features for each Co-permittee and create a map per MRP 3.0 requirements for each Co-permittee. Each Co-permittee will submit its map in the 2023 Annual Report.	X	X					<b>6/30/23; 9/30/23</b>	a.ii.(1) & a.iii.
a.2 Assist Co-permittees better understand utility of County Point-in-time homeless data for meeting MRP obligations. Set up a meeting with County staff to understand data.	X	A					<i>12/31/2022</i>	a.ii.(1) & a.iii.
a.3. Develop a report on the programmatic efforts currently being implemented by each Co-permittee to address discharges associated with homelessness.	X	A					<i>12/31/2022</i>	
a.4. Collaborate with regional partners to discuss and develop a report on best practices to protect water quality from the impacts of discharges associated with homelessness.	X	A					<b>9/30/2023</b>	a.i.(2) & a.iii.
a.5 Compile and evaluate BMPs implemented by agencies outside of SCVURPPP. Identify roles/responsibilities of different departments and costs.	X	A					<i>12/31/2022</i>	
a.6. Develop internal guidance to Co-permittees on best practices associated with reducing the impacts of discharges associated with homelessness.	X	A					<i>6/30/2022</i>	

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.17. Red text = new task for FY 22-23.

## Provision C.20 - Cost Reporting

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.20.b. Cost Reporting Implementation</b>								
<b>Goals:</b> Annually prepare and submit a fiscal analysis of the capital and operation and maintenance costs incurred to comply with MRP 3.0.								
<b>Actions –</b>								
b.1. Assist in the development of a draft cost reporting framework and fiscal analysis methodology, in collaboration with Co-permittees, other stormwater programs, and Water Board staff via participation in a project of regional benefit.	X	A					<b>12/31/2022</b>	b.i.- b.iv.
b.2. Assist with responses to Water Board staff comments on the draft framework and necessary revisions.	X	A					<b>6/30/2023</b>	b.i.- b.iv.
<b>C.20.c. Reporting</b>								
<b>Actions-</b>								
c.1. Submit the draft cost reporting framework and methodology to the Regional Water Board Executive Officer.	X	A					<b>12/31/2022</b>	c.i.

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.20. Red text = new task for FY 22-23.

## Provision C.21 - Asset Management

MRP Sub-Provision/Goal/Action	SCVURPPP	WVCWA	FY 22-23				Completion Date (Unless Noted) <sup>1</sup>	Applicable Sub-provision
			Q1	Q2	Q3	Q4		
<b>C.21.b. Asset Management Implementation</b>								
<b>Goal:</b> Develop guidance for Co-permittees on the development of Asset Management Plans that build on existing tracking systems and databases and utilize SCVURPPP tracking tools to the extent possible to meet MRP 3.0 requirements.								
<b>Actions –</b>								
b.1. Work with Co-permittees to understand current local tracking systems and databases and develop guidance for Asset Management Plan development, including recommendations for a system structure and a reporting strategy which has a nexus with Co-permittee GSI Plans and the Program’s Stormwater Treatment Measure (STM) Data Portal.	X	A					<i>12/31/2022</i>	b.i.
b.2. Conduct a review of current and future information management needs and existing structures/databases, and develop recommendations for improved information management system development in FY 2023-24. Coordinate this effort with the Asset Management work plan and framework for assisting Co-permittees in managing data on water quality-related hard assets.	X	A					<i>12/31/2022</i>	
b.3. Begin discussions with Co-permittee staff, collectively and individually, as to how the STM Data Portal can be further developed and coordinated with existing local data management systems to help Co-permittees fulfill the MRP 3.0 requirements for an Asset Management Plan. Include consideration of information related to asset management such as life cycle costs, O&M frequency, and beneficial design changes. Develop a work plan and framework describing the additional data fields to be incorporated; how the data will be collected/entered, displayed, and reported; and the timeframe to complete Data Portal enhancements.	X	A					<i>6/30/2023</i>	b.i.
b.4. Begin to implement an approved work plan to add O&M data, inspection data, construction and O&M costs, and asset management features to the Data Portal, as directed by the MC and as needed to meet asset management requirements.	X	A					<i>6/30/2023</i>	b.i.

<sup>1</sup> Completion dates in bold are specified in MRP. Dates in italics are internal deadlines. Key: X = Implementation lead. A = assist or develop guidance. FY 22-23 Work Plan - C.21. Red text = new task for FY 22-23.