COUNCIL AGENDA: 02-27-07
ITEM: 2.6

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

Memorandum

TO: HONORABLE MAYOR AND CITY COUNCIL

FROM: John Stufflebean
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SUBJECT: SEE BELOW

DATE: 02-07-07

Approved: Kay Winer

Date: 2/12/07

COUNCIL DISTRICT: City-Wide

SUBJECT: URBAN RUNOFF MANAGEMENT PLAN FISCAL YEAR 2007-2008 WORK PLANS

RECOMMENDATION

Authorize the City Manager to certify and submit the 2007-2008 City of San José Urban Runoff Management Work Plans to the San Francisco Bay Regional Water Quality Control Board (Water Board) in conformance with the City's Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System (NPDES) permit requirements.

OUTCOME

Approval of this recommendation will result in submittal of the City's FY 07-08 Urban Runoff (Stormwater) Management Work Plans to the Water Board, as required by permit.

BACKGROUND

The Federal Clean Water Act requires the City to operate under an NPDES stormwater municipal permit (also known as the stormwater permit) for the discharge of stormwater to surface waters via the City's storm sewer collection system. San José is subject to a stormwater permit issued to the Santa Clara Valley Urban Runoff Pollution Prevention Program (Program), a

collection of 15 agencies in Santa Clara County whose land area drains to South San Francisco Bay. The 15 co-permittees include the cities of Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Mountain View, Palo Alto, Santa Clara, Saratoga, Sunnyvale, the County of Santa Clara, and the Santa Clara Valley Water District. The Water Board last renewed the permit in February 2001 with subsequent amendments issued in October 2001 and July 2005.

The City's current permit has been administratively extended since February 2006, pending the adoption of the Bay Area-wide Municipal Regional Permit (Regional Permit). City staff has participated, and will continue to participate, in the permit process through the Program, Bay Area Stormwater Management Agencies Association (BASMAA), and individually as a City. Programmatic and reporting requirements for various City operations related to preventing pollutants from entering the City's storm drain system and creeks and rivers are expected to increase with the new Regional Permit. The Water Board is expected to adopt this permit later this year.

Performance standards for compliance with the stormwater permit are developed by each co-permittee and set out in the Urban Runoff Management Plan (Management Plan). The City Council approved the current Management Plan on August 31, 2004. The permit requires an annual Work Plan from each co-permittee for each permit element. These Work Plans demonstrate how the co-permittees will meet the performance standards they have established, and must be submitted to the Water Board by March 1 of each year. The Work Plans describe permit compliance activities to be undertaken during the forthcoming fiscal year, and where applicable over the five-year period of the permit. Progress on the Work Plans is reported to the Council and the Water Board in September of each year as an Annual Report.

[See Attachment, FY 2007-2008 Work Plans]

ANALYSIS

The proposed March 1, 2007 submittal updates San Jose's Annual Work Plans to meet the existing Program Element Performance Standards in the Management Plan and the requirements of the permit. The proposed Work Plans for FY 07-08 represent implementation under the current permit. The Work Plans include refinements to the FY 06-07 Work Plans and address continuous improvement needs. At this time, no major expanded activities have been included for FY 07-08 in anticipation of the upcoming Regional Permit. The Work Plans include 15 program elements to fulfill requirements of the stormwater permit. The proposed revisions for two program elements, New and Redevelopment (NRD) along with Industrial/Commercial Discharger Inspection (IND), are described below due to proposed changes in their associated Work Plan activities. The remaining 13 program elements contain only minor refinements to their Work Plans and are listed in this section under Annual Work Plan Updates.

New and Redevelopment Work Plan

The City began implementation of the New and Redevelopment permit provisions to incorporate treatment controls on development projects to mitigate pollutant loading in October 2003, starting with projects which create or replace one acre or more of impervious surface (such as paved surfaces, roofs, sidewalks, etc.). In accordance with the permit, stormwater treatment requirements have expanded over time to include smaller projects, and Council Policy 6-29 was revised accordingly. Phasing concluded in 2006 to include all projects that create or replace 10,000 square feet or more of impervious surface. This program element has been the most pervasive and challenging of the 2001 permit provisions.

Additionally, on October 18, 2005, the City began implementation of the hydromodification management plan (HMP) in accordance with the permit and Council Policy 8-14, which requires development projects to implement controls for runoff flows (not just pollutants). The HMP controls aim to address the potential impact of runoff flows and durations which can aggravate erosion in the City's creeks and rivers.

Implementation of this program element is a collaborative effort between the Departments of Planning, Building & Code Enforcement; Public Works; Transportation; and Environmental Services. Procedures and guidelines will continue to be refined as staff gains increasing knowledge and practice implementing both stormwater treatment and hydromodification controls. The proposed Work Plan for FY 07-08 includes continuation of database updates to both AMANDA, which tracks private development projects, and the CPMS (Capital Projects Management System) database which tracks public projects, as well as ongoing education and outreach to both City staff and the larger development community. Databases are being updated to include both the stormwater and hydromodification treatment measures incorporated in new development projects.

Industrial/Commercial Discharger Inspection Work Plan

The existing Work Plan for Industrial and Commercial Dischargers includes inspecting thousands of business in San José each year to ensure that proper practices are employed to prevent stormwater pollution. As part of permit implementation, the City is required to inspect businesses of certain types on a prescribed inspection frequency based on their potential to contribute urban runoff pollution. In recent years, the inspection workload has increased as more businesses are identified with the City's business licensing programs. This year the total number of businesses in the inventory increased to more than 9,000, an increase from approximately 6,100 in FY 05-06 and approximately 3,900 in FY 01-02. The result is an annual inspection target that has increased sharply with the projection of that workload remaining steady or increasing in future years. City staff is currently investigating strategies to meet this demand.

Annual Work Plan Updates

The updated Work Plans describe current programs and performance standards that the City will continue to implement to meet stormwater permit requirements to prevent or reduce pollution. The following 13 programs are ongoing and are listed here with the departments responsible for implementation. For these program elements, the updated Work Plans contain only minor refinements that are highlighted within the text of the attached Work Plans:

- Illicit Connection/Illegal Dumping (ICID) - Environmental Services
- Construction Inspection (CON) - Public Works, PBCE Building Division and Environmental Services
- Public Streets, Roads, and Highways Operation and Maintenance (PSR) and Rural Public Works (RPW) - Transportation; Parks, Recreation & Neighborhood Services
- Storm Drain Operation and Maintenance (SDO) - Transportation
- Water Utility Operation and Maintenance (WUOM) - Environmental Services /Municipal Water System.
- Control Program for Mercury (M) - General Services; Transportation; and Environmental Services
- Copper & Nickel Action Plans (CNAP) - Environmental Services
- Monitoring Program (MON) - Environmental Services
- Municipal Compliance – Environmental Services; Transportation; General Services
- Public Information and Participation (PIP) - Environmental Services
- Trash (TRA) - Environmental Services; Transportation; General Services; Parks, Recreation & Neighborhood Services; Public Works
- Pesticide Management (PM) - Environmental Services; Transportation; General Services; Parks, Recreation & Neighborhood Services; Public Works
- Permit Reapplication – Environmental Services

Municipal Regional Permit (Regional Permit)

The current stormwater permit was issued in February 2001 and has been administratively extended since February 2006 pending development of a Municipal Regional Permit (MRP or Regional Permit) for stormwater, which will cover 76 municipalities in the Bay Area. The City, along with other Bay Area municipalities, has been working with Water Board staff for more than two years on the development of the Regional Permit, in hope of ensuring a more level playing field for municipal stormwater management throughout the San Francisco Bay area and greater opportunities for leveraging regional resources. BASMAA, Program staff, and City staff have participated at different levels during the Water Board's process to develop the Regional Permit, ranging from focus group meetings to higher level steering committee meetings.

Although the municipalities committed significant resources to the Regional Permit collaborative process, the process has not yet resulted in consensus on the structure or content of a new Regional Permit. When discussions with Water Board staff came to a standstill last spring, BASMAA, in collaboration with the Bay Area stormwater programs, developed its own proposal of a draft Regional Permit which was released to the public in September 2006. Water Board staff subsequently released a proposed working draft Regional Permit in mid-October 2006 which was quite different than the BASMAA proposal. The Water Board's draft Regional Permit includes additional and more stringent requirements for the control of specific pollutants such as pesticides, mercury, and trash. Also, new programs and more stringent permit requirements are listed for new and redevelopment projects, including stormwater hydromodification control measures to slow the volume and duration of stormwater runoff from more development projects. The draft permit also includes significantly expanded requirements related to municipal operations and maintenance, and substantial requirements for tracking, training, monitoring, and reporting across nearly all stormwater program elements.

BASMAA responded to the Water Board's draft Regional Permit on behalf of all Bay Area municipalities in December 2006 and identified five major concerns:

1. The proposed requirements were overly prescriptive, specifying means and methods of compliance and severely limiting individual or collective determination of the most cost-effective and efficient means of achieving water quality goals;
2. The draft Regional Permit requirements go beyond existing requirements without providing the link to water quality benefits obtained from increased requirements;
3. The increased requirements represent a significant expenditure of public resources that may not be available at the local level;
4. The draft permit lacks priorities or focus and appears to be simply a laundry list of new requirements; and
5. The draft permit includes substantial increases in tracking and reporting across all stormwater program elements, which significantly increase permittee costs, without justification of need or how such additional data would be used.

As the process continues, a Tentative Order is anticipated to be released in early spring, which will provide greater clarity on what the Water Board staff intend to present to their Board for adoption. City staff continues to participate in workshops and other forums to further discuss these potential requirements with Water Board staff. New requirements listed in the Water Board's draft Regional Permit will demand significantly more resources for several City departments. City staff will continue to evaluate the resource impacts of proposed permit requirements as the development of the Regional Permit progresses. Staff will update and seek Council direction on the Regional Permit, once a Tentative Order becomes available.

POLICY ALTERNATIVES

Alternative #1: Provide direction to staff to not submit the 2007-2008 Urban Runoff Management Plan Work Plan to the Water Board for certification.

Pros: None known.
Cons: Delay in the submittal beyond March 1 would put the City at risk of being found in violation of its stormwater NPDES Permit.
Reason for not recommending: This Work Plan submittal will fulfill a permit-mandated obligation and maintain City compliance with its stormwater NPDES Permit. This Work Plan represents the best and most complete projection of City activities related to stormwater for FY 07-08.

Alternative #2: Provide direction to staff to modify the 2007-2008 Urban Runoff Management Plan Work Plan to include additional activities.
Pros: The City would be implementing activities above and beyond permit requirements.
Cons: Additional proposed activities could result in the need for additional City resources.
Reason for not recommending: The proposed Work Plan represents the best and most complete projection of required City activities related to stormwater for FY 07-08. No major expanded activities are recommended in anticipation of the upcoming Regional Permit.

Alternative #3: Provide direction to staff to modify the 2007-2008 Urban Runoff Management Plan Work Plan to reduce the number and scope of proposed activities.
Pros: None known.
Cons: Could put the City at risk of being found in violation of its stormwater NPDES Permit.
Reason for not recommending: A reduced number and scope of proposed activities may not fulfill a permit-mandated obligation and thereby place the City at risk for being found out of compliance with its stormwater NPDES Permit.

PUBLIC OUTREACH

- ❑ **Criteria 1**: Requires Council action on the use of public funds equal to $1 million or greater. **(Required: Website Posting)**

- ❑ **Criteria 2:** Adoption of a new or revised policy that may have implications for public health, safety, quality of life, or financial/economic vitality of the City. **(Required: E-mail and Website Posting)**

- ❑ **Criteria 3:** Consideration of proposed changes to service delivery, programs, staffing that may have impacts to community services and have been identified by staff, Council or a Community group that required special outreach. **(Required: E-mail, Website Posting, Community Meetings, Notice in appropriate newspapers)**

Although the Work Plan does not meet the above criteria, outreach is an integral part of the Urban Runoff program. The Management Plans include components to conduct outreach to various sectors of the community on relevant stormwater issues. Many of these outreach activities are accomplished in partnership with the countywide Program or regional campaigns. No additional outreach was conducted specifically for this recommendation; individual items

associated with the various Work Plan elements will undergo appropriate outreach as part of their implementation. For example, the Work Plans include components to conduct outreach to various sectors of the community on relevant stormwater issues, e.g., pesticide use, mercury, and trash, to ensure that only rainwater enters the storm sewer system. In addition, development of relevant Work Plan elements has been conducted using input from the development community; both Public Works and Planning employ ongoing Developer's Roundtables as forums for outreach on stormwater provisions.

COORDINATION

The Work Plans and this memorandum were developed jointly by staff from the Departments of Environmental Services; Public Works; Planning, Building & Code Enforcement; Transportation; Parks, Recreation & Neighborhood Services; General Services; the Redevelopment Agency; and the City Attorney's Office. The Work Plan activities and schedule represent staff's best estimate of the effort needed to meet the compliance expectations for these requirements.

Ultimately, the fulfillment of these requirements as contemplated by the permit involves all City departments carrying out specific Work Plan tasks. The departments are each committed to working together to integrate these requirements fully into City operations in a timely manner.

FISCAL/POLICY ALIGNMENT

This submittal is consistent with the Urban Runoff Management Plan, approved by Council on August 31, 2004, to support activities that comply with the City's Stormwater NPDES Permit.

COST SUMMARY/IMPLICATIONS

The required March 1 submittal of the Work Plans to the Water Board describes the activities therein as subject to City appropriation of funding which does not occur until June of each year. The Work Plans comprise activities that support compliance with regulatory requirements and protect the City's vital core service of managing the storm sewer system.

Programs related to the NPDES Permit, along with the cost of operating and maintaining the City's storm sewer system, have been largely funded by storm sewer service and use charges through the Storm Sewer Operating Fund (Fund 446). For all program elements, cost increases associated with a new Municipal Regional Permit and proposed strategies to cover the increases will be brought to Council for consideration during the FY 08-09 annual budget process. Staff is also evaluating grant-funding opportunities to leverage City resources for enhanced return to the City.

BUDGET REFERENCE

Fund #	Appn #	Appn Name	RC #	Total Appn.	Amt for Contract	2006-2007 Adopted Operating Budget	Last Budget Action (Date, Ord.No.)
446	0762	Non-Personal/ Equipment	700730	$2,181,121	N/A	VIII-38	10/17/2006 Ord. 27888

CEQA

Exempt, File No. PP06-013.

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Attachment: FY 2007-2008 Work Plans

For questions, please contact Melody Tovar, Deputy Director, Environmental Services Department, at 408-277-3892.

City of San José
Urban Runoff Management Plan
FY 07-08 Work Plans

Santa Clara Valley
Urban Runoff
Pollution Prevention Program

CITY OF SAN JOSE
CAPITAL OF SILICON VALLEY

City of San José

Urban Runoff Management Plan

Chapter 11:

Santa Clara Valley Urban

Runoff Pollution Prevention Program

Attachment 1: FY 07-08 Work Plans

Prepared by the Environmental Services Department

March 1, 2007

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Key to revisions in the Work Plans

Bold text……. Bold text indicates elements that have been added to the Work Plans since the URMP FY 06-07 Work Plans approved in March 2006

~~Strikethrough text~~……Strikethrough text indicates elements that have been deleted from the Work Plans since the URMP FY 06-07 Work Plans approved in March 2006

Introduction

This compilation of annual work plans for the City of San José Urban Runoff Management Plan (URMP) has been developed for FY 2007-2008 pursuant to Section C.6.b of the City's Municipal Separate Storm Sewer System NPDES permit (No. CAS029718), Order 01-024. The work plans include tasks, responsibilities, and schedules needed to implement the program elements in the URMP with the overall intent to reduce stormwater pollution in the City's storm drains, creeks and rivers. The Environmental Services Department coordinates development and review of the work plans in cooperation with staff from all affected City departments.

The Permit requires that annual work plans be submitted to the Water Board by March 1 of each year. This submission precedes completion of the City's annual budget development and approval process. While the work plans are developed using the best available information regarding budget forecasts, all activities in the work plans are subject to the approval of funding by the City Council in June of each year.

The City of San José is committed to managing and protecting stormwater quality and dedicates significant resources to a variety of activities designed to address stormwater quality issues. The City actively participates in many local and regional efforts designed to leverage the most value for its resources and citizens and strives to be a leader in watershed protection.

Alum Rock Library detention pond, a stormwater treatment measure

Illicit Connection / Illegal Dumping

ICID Work Plan

The City's Environmental Inspectors located within the Environmental Services Department (ESD) Watershed Protection Division respond to complaints regarding illegal discharges or threats of discharge to the storm sewer system. Residential incidents are typically the most frequent type of complaint, with vehicle-related sources being most common. Dumping of various materials is also a prevailing source of incidents. ESD responds to all complaints with education and enforcement in partnership to achieve compliance and prevent future incidents. This program element is implemented pursuant to permit provision C.2 and C.6.a.ii.

Storm drain inlet stenciled with hotline number and local creek name

ICID 1 - Response to Complaints

The City of San José will respond to complaints regarding ICID dumping activities into the storm drain system and will ensure that the activity has ceased or is on a time schedule to cease.

#	Activities	Compliance Date	Responsible Party
A.	Update database system to track ICID complaint information.	Done FY 02-03	ESD-WE
B.	1. Document complaint activity, the number of ICID complaints that the City received, and that the activity has ceased or is an allowable discharge.	Annually	ESD-WE
	2. Prepare draft complaint activity data tables to review trends and to facilitate timely evaluation of the data.	**Annually, Q3**	**ESD-WE**
C.	Document to the Water Board annually follow-up activities from each ICID complaint response.	Annually	ESD-WE
D.	1. Review effectiveness of standard operating procedures for responding to ICID complaints.	Ongoing	ESD-WE
	2. Refine and implement standard operating procedures for responding to ICID complaints/referrals.	As Needed	ESD-WE
E.	Work with SCVURPPP to refine administrative procedure for providing referrals to the Water Board.	Pending Implementation by Program	ESD-WE, Program
F.	Refine and implement standard operating procedures to incorporate results of ICID 1E.	Pending Implementation by Program	ESD-WE, Program

ICID 2 - Investigations of High Priority Areas

The City of San José will conduct investigations of high priority areas. High Priority is defined as areas with a high potential for non-storm water discharges to the City's collection system.

#	Activities	Compliance Date	Responsible Party
A.	Target areas for monitoring by identifying high priority areas, primary types and sources of ICID pollution based on complaints, historical inspection records, inspector knowledge, and monitoring information.	Annually	ESD-WE
	1. Perform GIS analysis on frequently occurring ICID sources and/or types.	Done FY 03-04	ESD-UR
	2. Perform outreach in targeted areas based on GIS analysis and other analyses as available. See PIP 2 for details.	**Annually**	**ESD-UR & WE**
B.	Conduct investigations of high priority areas based on ICID 2A.	Ongoing	ESD-WE
C.	Document to the Water Board that investigations of high priority areas have been conducted.	Annually	ESD-WE

ICID 3 - Inspector Training

The City of San José will ensure that ICID inspectors are adequately trained in inspection procedures, documentation, and enforcement related to stormwater pollution prevention.

#	Activities	Compliance Date	Responsible Party
A.	Conduct annual training for ICID inspectors.	Annually, Q1	ESD-WE
B.	Provide and document on-the-job training and other training opportunities, such as inspection workshops.	Ongoing	ESD-WE
C.	Review inspection training protocols to identify new training opportunities, approaches, and materials.	Annually	ESD-WE

ICID 4 - Outreach and Technology Transfer

The City of San José will distribute outreach and technology transfer material containing applicable control measures and/or BMPs to target parties responsible for ICID activities.

#	Activities	Compliance Date	Responsible Party
A.	Determine need for new and/or revised outreach and technology transfer material by getting feedback from inspectors regarding 1) continuing problem activities; 2) discharge types; 3) monitoring and complaint data; and 4) usefulness of existing outreach and technology transfer material.	Ongoing	ESD-MarComm ESD-UR
B.	Develop, audit and/or modify existing outreach material, as needed, based on report developed under ICID 4A.	As Needed	ESD
C.	Document to Water Board that outreach and technology transfer material and/or BMPs have been distributed.	Annually	ESD-UR

#	Activities	Compliance Date	Responsible Party
D.	Develop and implement standard operating procedures to gather customer feedback on ICID services.	Development Done FY 02-03 Implementation Ongoing	ESD-WE

ICID 5 - SOPs Effectiveness Evaluation

The City of San Jose's Watershed Enforcement staff will review and evaluate the effectiveness of its SOPs in responding to complaints regarding illicit connections and illegal dumping activities into the storm drain system.

#	Activities	Compliance Date	Responsible Party
A.	Document and evaluate effectiveness of SOPs.	Annually	ESD-WE
B.	Document and evaluate what worked well and what needs improvement.	Annually	ESD-WE

Industrial & Commercial Dischargers

IND Work Plan

The City's Environmental Inspectors, located within the Watershed Protection Division of the Environmental Services Department, inspect more than 4,000 businesses per year to ensure that proper practices are employed to prevent stormwater pollution. How frequently a business is inspected depends on their potential for contributing pollutants as determined by previous inspection results. This method of assigning inspection frequencies has been effective in focusing limited inspection resources on high priority cases to best protect water quality. Generally, over 70% of the businesses inspected are found to have no significant stormwater issues and thus do not warrant near-term re-inspection. When issues are identified, education and enforcement are used together to achieve compliance. This Program element is implemented pursuant to permit provision C.2.

A City inspector explains stormwater Best Management Practices to a downtown restaurateur

IND 1 - Notice of Intent (NOI) Filers

The City of San José will conduct inspections of those facilities that have filed an NOI with the State and appear on a list provided by the State. An NOI is required to be filed with the State by companies that are considered to have a high potential to contaminate stormwater and are classified under certain standard industrial classification (SIC) codes.

#	Activities	Compliance Date	Responsible Party
A.	Annually, obtain NOI filer database from State with annual information, review information and identify new NOI facilities for inspection the following year.	Annually	ESD-WE
B.	Conduct and document initial inspections of NOI Filers within one year using the inspector checklist form to determine exposure and assign a future inspection frequency to each facility accordingly. Document whether the facility had submitted an NOI, and whether a SWPPP and a SWMP were on site.	Ongoing	ESD-WE
C.	Conduct and document annual inspections of facilities determined to have exposure in accordance with inspection frequency schedule.	Ongoing	ESD-WE
D.	Conduct and document inspections of facilities that need to file an NOI at least once every five years and in accordance with the inspection frequency schedule identified in IND 3.	Ongoing	ESD-WE

#	Activities	Compliance Date	Responsible Party
E.	Maintain the database to track the inspection information from the inspector checklist and to include all NOI filer SIC codes required by the Industrial Activities Stormwater General Permit.	Ongoing	ESD-WE

IND 2 - Non-Filer Investigations

The City of San José will inspect industrial facilities that may be subject to general permit requirements but are not found on the NOI filer list provided by the State and that conduct activities identified by the following SIC codes:

5015: Automobile Dismantlers

5093: Other Recycling Industries

3200 series: Stone, Clay and Concrete Products Industry

4100 & 4200 series: Trucking Facilities that perform on-site vehicle repair, maintenance or washing.

#	Activities	Compliance Date	Responsible Party
A.	Identify industrial facilities that conduct activities with the SIC codes listed in the IND SOPs.	Annually	ESD-WE
B.	Develop a list of facilities targeted for inspection during upcoming year that may be subject to general permit requirements for NOI based on business licenses, etc.	Annually	ESD-WE
C.	Conduct and document initial inspections of industrial facilities with the SIC codes listed referenced in IND 2A, using the inspector checklist form to document whether the facility constituted a potential threat to discharge pollutants to the storm drain collection system, whether the facility had submitted an NOI, and whether a SWPPP and a SWMP were on site. Maintain database.	Ongoing	ESD-WE
D.	Conduct ~~&~~ **and** document annual inspections of facilities determined to have exposure in accordance with implementation schedule. Add the facility to appropriate database(s) and assign an inspection frequency. If the facility inspected is determined to need to file an NOI and is not able to provide an NOI, SWPPP or SWMP, refer to the ~~RWQCB~~ **Water Board**.	Ongoing	ESD-WE
E.	Work with the Program's Industrial Inspection Ad Hoc TG on an Administrative procedure for providing referrals to the Water Board and document providing referrals to the Water Board for facilities with significant problems.	Pending Implementation by Program	ESD-WE, ESD-UR

IND 3 - City Regulated Facilities

The City of San José will conduct inspections of City Regulated commercial facilities as identified below:

Type	Frequency
Food service facilities	2 or more AOCs* over a rolling three year time period - Every year 1 AOC over a rolling three year time period - Every two (2) years 0 AOCs over a rolling three year time period - Every three (3)years
All Other City Regulated facilities	2 or more AOCs* over a rolling five year time period - Every year 1 AOC over a rolling five year time period - Every two (2) years 0 AOCs over a rolling five year time period but have exposure - Every five (5) years 0 AOCs over a rolling five year time period with no exposure or potential for exposure - No further inspections
Facilities for which a referral or ICID complaint is received	As soon as practicable for violations and every year until they meet the above criteria.

*Area of Concern (AOC) = A violation based on the San José Municipal Code 15.14.530 issued to a facility during a stormwater inspection.

#	Activities	Compliance Date	Responsible Party
A.	Determine industrial/commercial facilities identified in the IND SOPs for inspection in each FY.	Annually, Q1	ESD-WE
B.	Conduct and document inspections of City Regulated facilities, other than food service facilities, at least once every five (5) years in accordance with the inspection frequency schedule. If determined to have no impact or no potential for pollution, will not be scheduled for future inspection.	Ongoing	ESD-WE
C.	Conduct and document inspections of City Regulated food service facilities at least once every three (3) years. Initial approved performance standards require inspections every three years.	Ongoing	ESD-WE
D.	Conduct and document inspections for which a referral or complaint was received within five days of complaint received and second inspection within one year.	Ongoing	ESD-WE
E.	Develop a database to track the inspection information from the inspector facility inspection report.	Done FY 02-03	ESD-WE
	1. Implement new Environmental Enforcement Data Management System.	Done FY 03-04	ESD-WE
	2. Prepare draft data inspection tables to review data trends and to facilitate timely evaluation of the data.	**Annually, Q3**	**ESD-WE**
F.	Maintain database to track inspection information from inspector facility inspection report and to include new industrial program categories.	Ongoing	ESD-WE
G.	For B, C, D, and E, collect information during inspections on the potential for stormwater pollution at City Regulated facilities in order to determine the appropriate inspection frequency for the various facilities.	Ongoing	ESD-WE
H.	Develop an inspection frequency plan to track frequency of inspections. Implement & update, as needed, the inspection frequency plan.	Development: Done FY 01-02 Ongoing Updated As Needed	ESD-WE

IND 4 - Compliance

The City of San José will conduct industrial/commercial inspections to determine the existence of discharges or potential discharges which are illegal under local ordinances. The facility operator will be notified of observed areas of concern to be corrected and/or if official action on violations is necessary, it will take place under local enforcement procedures.

#	Activities	Compliance Date	Responsible Party
A.	Document facilities that have enforcement actions and the type of enforcement actions conducted for the existence of discharges or threatened discharges that are illegal under local ordinances.	Ongoing	ESD-WE

IND 5 - Training

The City of San José will ensure that industrial/commercial inspectors are adequately trained in inspection procedures, documentation, and enforcement related to stormwater pollution prevention.

#	Activities	Compliance Date	Responsible Party
A.	Conduct annual training for IND inspectors.	Annually, Q1	ESD-WE
B.	Maintain a training plan and provide and document on-the-job training and other training opportunities such as industrial/ commercial inspection workshops.	Ongoing	ESD-WE
C.	Review inspection training protocols to identify new training opportunities, approaches, and materials.	Annually	ESD-WE

IND 6 - Outreach

The City of San José will help develop and distribute outreach and technology transfer material containing applicable control measures and/or BMPs to industrial/commercial facility operators responsible for IND activities.

#	Activities	Compliance Date	Responsible Party
A.	Identify and list existing outreach and technology transfer material.	Annually	ESD-UR
B.	Distribute applicable outreach and technology transfer material to industrial/commercial facility operators. Document to the ~~RWQCB~~ **Water Board** that outreach and technology transfer material and/or BMPs have been distributed, as needed, to industrial/commercial facility operators.	Distribution: Ongoing See PIP Program Element in Annual Report	ESD-UR
C.	Determine usefulness of outreach and technology transfer materials by obtaining feedback from industrial/commercial facilities. Obtain feedback from inspectors about the effectiveness of existing outreach and technology transfer material and develop and/or modify existing outreach material.	As Needed	ESD-UR

IND 7 - NOI Filers Effectiveness Evaluation

The City of San Jose's Watershed Enforcement staff will review and evaluate the effectiveness of its inspections procedures and database tracking system.

#	Activities	Compliance Date	Responsible Party
A.	Document and evaluate the effectiveness of NOI Filers inspections procedures.	Annually	ESD-WE
B.	Document and evaluate the effectiveness of the NOI Filers database tracking system.	Annually	ESD-WE
C.	Document and evaluate what worked well and what needs improvement.	Annually	ESD-WE

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New and Redevelopment

NRD Work Plan

The New and Redevelopment provision (also referred to as C.3) requires that development projects implement controls to address pollutant discharges and increased stormwater runoff flows for the life of a project by incorporation of treatment and hydromodification measures and other appropriate source control and site design measures.

Porous-paved parking lot: a stormwater site design and treatment control measure

The City began phased implementation of hydraulic (also referred to as numeric) sizing requirements for stormwater treatment control measures in conformance with City Council approved Post-Construction Urban Runoff Management Policy 6-29 on October 15, 2003. Effective August 15, 2006, hydraulic sizing was required for all projects that create or replace 10,000 square feet of impervious surface. On October 18, 2005, Council approved Post-Construction Hydromodification Management Policy 8-14 and the City began implementation of hydromodification management requirements. This Program element is implemented pursuant to permit provision C.3.

NRD 1 - Legal Authority

The City of San José will have adequate legal authority to implement new development control measures, including all applicable requirements of Provision C.3, as part of its development plan review and approval procedures and other appropriate new development and redevelopment permitting procedures (Provision C.3.a.i).

#	Activities	Compliance Date	Responsible Party
A.	Revise Municipal Code to ensure adequate legal authority to implement new development control measures (C.3.a.i).	As Needed	PBCE, ESD, PW

NRD 2 - Guidance to Developers

The City will provide developers with information and guidance materials on site design guidelines, building permit requirements, and BMPs for stormwater pollution prevention, as appropriate for the type of project and location.

#	Activities	Compliance Date	Responsible Party
A.	1. Draft necessary revisions to Guidance Manual on Selection of Stormwater Quality Control Measures to allow incorporation of hydraulic sizing design criteria and provide to developers.	Done FY 02-03	PBCE, ESD, PW, RDA
	2. Refine Guidance Manual on Selection of Stormwater Quality Control Measures to incorporate HMP measures, as necessary.	**Done** FY 05-06	PBCE, ESD, PW, RDA, Program

#	Activities	Compliance Date	Responsible Party
B.	Provide development community with revised information and guidance materials concerning any adopted on site design, building permit requirements, hydraulic sizing design criteria and HMP criteria, and maintenance requirements for BMPs for stormwater treatment measures.	Done FY 02-03	PBCE, ESD, PW, RDA
	1. Coordinate w/development community on proposed hydraulic sizing criteria for structural stormwater treatment measures, HMP criteria and any proposed revisions to Guidance Manual and policy through workshops and regular meetings.	Done FY 02-03	PBCE, ESD, PW, RDA
	2. Update guidance material regarding maintenance responsibilities for any HMP measures.	**Done** FY 05-06	PBCE, ESD, PW, RDA, Program

NRD 3 - CEQA Requirements

The City will ensure that environmental documents required for those projects that fall under CEQA and NEPA review address both significant and cumulative stormwater quality impacts during the life of the project, and relevant permit requirements. These documents include EIRs, negative declarations and initial study checklists (C.3.m).

#	Activities	Compliance Date	Responsible Party
A.	Review and evaluate the City's Environmental Review procedures to improve the review for water quality impacts and identification of mitigation measures. (Provision C.3.m.)	Done FY 02-03	PBCE, ESD, PW, RDA
	1. Identify areas where new or additional water quality review processes and related documents or checklist questions are needed and propose schedule for revision.	Done FY 02-03	PBCE, ESD, PW, RDA
	2. Refine and update areas where new or additional water quality related mitigation measures may be needed.	Done FY 05-06	PBCE, ESD, PW, RDA
B.	Report on revisions made to environmental review processes.	Done FY 02-03	PBCE, ESD, PW, RDA

NRD 4 - Project Mitigation Measures and Design Requirements

The City will encourage developers of all projects subject to design review under its development plan review and approval procedures to consider incorporating appropriate source control and site design measure that minimize stormwater pollutant discharges to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Revise current Policy on Post-Construction Urban Runoff Management as necessary to incorporate minimum BMP requirements for all projects.	Done FY 03-04	PBCE, ESD, PW, RDA
B.	Review and modify development permit approval procedures for adopted revisions as necessary.	Done FY 03-04	PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
C.	Review the design standards and guidance for opportunities to make revisions that would result in reduced impacts to water quality and summarize how they were incorporated into approval procedures.	Done FY 03-04	PBCE, ESD, PW, RDA
D.	Review the existing source control measures contained in site design standards, guidance documents and conditions of approval for opportunities to limit stormwater pollution. (Provision C.3.k.)	Done FY 03-04	PBCE, ESD, PW, RDA
E.	Review General Plan and revise as necessary to incorporate water quality and watershed protection principles and policies, and summarize revisions made.	Done FY 02-03 **Ongoing**	PBCE
F.	Review the design standards and guidance for opportunities to make revisions as necessary that would result in reduced impacts to water quality and summarize how they were incorporated into approval procedures. Such revisions are listed in Provision C.3.j.	Done FY 03-04	PBCE, ESD, PW, RDA
	1. Identify and document existing site design standards and guidance documents and policies.	Done FY 03-04	PBCE, ESD, PW, RDA
	2. Revise Site Design Measures and Standards, as necessary.	Done FY 03-04	PBCE, ESD, PW, RDA

NRD 5 - Group 1, 2 and HMP Project Requirements

On October 15, 2003, the City began phased implementation of hydraulically sized stormwater treatment measures in conformance with Policy 6-29 beginning with projects that create or replace one acre or more of impervious surface area and are considered Land Uses of Concern. On February 15, 2005, all projects that created or replaced one acre or more of impervious surface were required to hydraulically size stormwater treatment measures. On May 17, 2005, the threshold changed to include all projects that created or replaced 10,000 square feet of impervious surface and are a Land Use of Concern. Effective August 15, 2006, all projects that create or replace 10,000 square feet or more of impervious surface were required to include hydraulically sized stormwater treatment measures in each project.

On October 18, 2005, all projects that meet the criteria described in Policy 8-14 are required to manage increases in runoff flow, volume and duration.

The following is a brief summary of the Best Management Practices that are required in all development projects:

- Site design shall include measures to minimize impervious land coverage, maximize infiltration (where appropriate and designed to protect groundwater quality) and provide detention or retention as part of landscaping where feasible (C3.b.i and C.3.j);
- Source controls shall be required to limit pollution generation, discharge, and runoff as appropriate (C.3.k), including measures to discourage pesticide use (C.9.d.ii);
- Stormwater treatment measures shall be designed in accordance with the numeric design criteria in Policy 6-29 (Provision C.3.d); and
- Increases in runoff flow, volume and duration shall be managed in accordance with Policy 8-14 (Provision C.3.f).

#	Activities	Compliance Date	Responsible Party
A.	1. Propose revisions to current Policy 6-29 on Post-Construction Urban Runoff Management as necessary to incorporate hydraulic sizing design criteria.	Done FY 03-04	PBCE, ESD, PW, RDA
	2. Revise current Policy 6-29 on Post-Construction Urban Runoff Management as necessary to incorporate hydraulic sizing design criteria.	Done FY 03-04	PBCE, ESD, PW, RDA
	3. Revise policy as needed for Group 2 implementation.	Done FY 04-05 **& FY 06-07**	PBCE, ESD, PW, RDA
	4. Revise policy as needed for HMP implementation.	Done FY 05-06	PBCE, ESD, PW, RDA
B.	Develop a list of Annual Reporting requirements from Provision C.3. design data tracking needs and protocols.	Done FY 02-03	PBCE, ESD, PW, RDA
	1. Compile a list of new development and redevelopment projects by name, type of project, site acreage or square footage, square footage of new impervious surface, treatment BMPs and numeric sizing criteria used for applicable projects. Also, the source control measures required and pesticide reduction measures.	Annually	PBCE, ESD, PW, RDA
	2. Update existing data collection software for private projects to enable tracking of all projects with treatment or HMP measures.	**FY 07-08**	**PBCE, ESD, PW, RDA**
C.	Revise and update permitted alternatives to numeric sizing through Alternative Measures Program in Policy 6-29.	Done FY 04-05	PBCE, ESD, PW, RDA
	1. Report to City Council on Alternative Measures Program revisions in Policy 6-29. (Provision C.3.g.)	Done FY 04-05	PBCE, ESD, PW, RDA
	2. Track name and location of projects in the Alternative Measures Program, project type and size, percent impervious surface, reason for granting waiver, terms of waiver, equivalent benefit provided, alternative treatment project or regional project receiving the benefit and date of completion of the alternative treatment project or regional project (Provision C.3.g).	Annually	PBCE, ESD, PW, RDA
	3. Report to City Council on projects approved with numeric sizing alternatives through Alternative Measures Program. (Provision C.3.g.)	Annually	PBCE, ESD, PW, RDA
D.	Draft post-construction treatment BMP certification procedures. (Provision C.3.h)	Done FY 02-03	PBCE, ESD, PW, RDA
	1. Track name and location of projects subject to certification. (Provision C.3.h.)	Annually	PBCE, ESD, PW, RDA
E.	Participate on SCVURPPP's Hydromodification Management Plan work group and develop procedures for limiting peak stormwater runoff discharge rates from development projects. (Provision C.3.f.)	Done FY 04-05	PBCE, ESD, PW, RDA
F.	1. Review and modify development permit approval procedures and standard operating procedures as necessary to incorporate requirements for:		PBCE, ESD, PW, RDA
	a. Group 1	Done FY 03-04	
	b. Group 2	Done FY 04-05	

#	Activities	Compliance Date	Responsible Party
	c. HMP	**Done** FY 05-06	
	2. Update and refine criteria and checklist to aid Department of Planning, Building & Code Enforcement & Department of Public Works planners and engineers in determining whether a development project should be required to incorporate post-construction treatment control measures and their related operation and maintenance requirements as necessary.		PBCE, ESD, PW, RDA
	a. Group 1	Done FY 03-04	
	b. Group 2	Done FY 04-05	
	c. HMP	**Done** FY 05-06	
	3. Update and refine standard conditions of approval as necessary to ensure proper selection, design of and installation of structural stormwater treatment measures per Provision C.3.b.,c.,d as necessary.		PBCE, ESD, PW, RDA
	a. Group 1	Done FY 03-04	
	b. Group 2	Done FY 04-05	
	c. HMP	**Done** FY 05-06	
G.	Develop and propose enhanced reporting format for documenting use of pesticide reduction measures at development sites. (Provision C.3.n. & C.9.ii.)	Done FY 02-03	PBCE, ESD, PW, RDA
	1. Based on City's Pesticide Management Plan, establish criteria for tracking percentage of new development projects for which pesticide reduction measures were required and begin tracking. (Provision C.3.n. & C.9.d.ii)	Done FY 03-04	PBCE, ESD, PW, RDA
H.	Implement any new adopted development conditions of approval, and procedures to developments with significant stormwater pollution potential. (Provision C.3.b.)	Done FY 02-03	PBCE, ESD, PW, RDA

NRD 6 - Developer Conformance with State Requirements

The City will require developers of projects that disturb a land area of one acre or more to demonstrate conformance with the State General Construction Activity Storm Water Permit including filing of NOI, development of a SWPPP, et al.

#	Activities	Compliance Date	Responsible Party
A.	Include as condition of approval for projects that disturb a land area of one acre or more, a requirement to demonstrate coverage under the State General Construction Activity Storm Water Permit.	Done FY 02-03	PBCE, PW, RDA
B.	Track the projects that contained above condition of approval.	Done FY 02-03 See CON Program Element in Annual Report	PBCE, PW, RDA

NRD 7 - Developer Erosion Control Plans

The City will require developers of projects with potential for significant erosion and planned construction activity during the wet season to prepare and implement an effective erosion and/or sediment control plan or similar document prior to the start of the wet season.

#	Activities	Compliance Date	Responsible Party
A.	Include as a condition of approval for applicable projects a requirement to prepare and implement an erosion and sediment control plan.	Done FY 02-03	PBCE, PW, RDA
B.	Track the projects that contained above condition of approval.	Done FY 02-03 See CON Program Element in Annual Report	PBCE, PW, RDA

NRD 8 - Operation and Maintenance for Structural Stormwater Controls

The City will implement an operation and maintenance (O&M) verification program that includes (C.3.e):

- Compiling a list of private and public properties and responsible operators for all stormwater treatment measures;
- Inspecting a subset of prioritized treatment measures for appropriate O&M, on an annual basis, with appropriate follow-up and correction;
- Requiring legally enforceable agreements or other mechanisms assigning responsibility for O&M of treatment measures.

#	Activities	Compliance Date	Responsible Party
A.	Work with SCVURPPP to develop guidance for implementing O&M Program.	Done FY 02-03	PBCE, ESD, PW, RDA
B.	1. Draft summary of details of operation and maintenance verification program: organizational structure, evaluation, proposed improvements, inspections and follow-up, including criteria for setting priorities. (Provision C.3.e)	Done FY 03-04	PBCE, ESD, PW, RDA
	2. Conduct pilot inspection program to inspect treatment BMPs that were constructed prior to numeric sizing requirements. The intention of the pilot program is to assess workload impacts, data tracking and collection methods, and funding for O&M programs and to use this information to revise the O&M program.	**Done** FY 05-06	ESD
	3. Revise and update draft summary of details of operation and maintenance verification program: organizational structure, evaluation, proposed improvements, inspections and follow-up, including criteria for setting priorities as necessary. (Provision C.3.e.)	**Done** FY 05-06	PBCE, ESD, PW, RDA
C.	1. Include as a condition of approval a requirement that developers of projects that include installation of permanent structural stormwater controls are required to establish and provide proof of operation and maintenance of such controls.	Done FY 03-04	PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
	2. Revise and update condition of approval requirement that developers of projects that include installation of permanent structural stormwater controls are required to establish and provide proof of operation and maintenance of such structural controls as necessary.	**Done** FY 05-06 **Ongoing**	PBCE, ESD, PW, RDA
	3. Develop model permit conditions with BMP fact sheets to include in use permits where appropriate.	Done FY 02-03	PBCE, ESD, PW, RDA
	4. Compile a list of projects & responsible operators subject to C.3.e. provision.	Done FY 03-04 Annually	PBCE, ESD, PW, RDA
D.	Track and compile a list of priority properties inspected and inspection results. (Provision C.3.e.iii.)	Done FY 03-04 Annually	PBCE, ESD, PW, RDA
	1. Determine criteria for setting priorities for inspection of structural stormwater treatment measures & inspection frequency.	Done FY 02-03	PBCE, ESD, PW, RDA
	2. Update and revise criteria for setting priorities for inspection of structural stormwater treatment measures & inspection frequency as necessary.	**Done** FY 05-06	PBCE, ESD, PW, RDA
	3. Develop local inspection program for verification of proper O&M.	Done FY 02-03	PBCE, ESD, PW, RDA
	4. Update and revise local inspection program for verification of proper O&M as necessary.	**Done** FY 05-06	PBCE, ESD, PW, RDA
E.	**Update inspection software to track and schedule inspections for the number of sites that installed treatment and/or HMP measures.**	**FY 07-08**	**ESD-WE**

NRD 9 - Applicability to Public Projects

The City will ensure municipal capital improvement projects include stormwater quality control measures during and after construction, appropriate for each project, and that contractors comply with stormwater quality control requirements during construction activities and maintenance activities.

#	Activities	Compliance Date	Responsible Party
A.	Develop and implement a process to ensure that municipal capital improvement projects install structural stormwater quality control measures as necessary.	Done FY 02-03	PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
	1. Participate on SCVURPPP work group tasked with developing a technical guidance document for use by municipal staff to ensure that the document includes standard specifications and details, sizing methodologies, and model conditions of approval acceptable for use in City projects as necessary. (Provision C.3.b. & d.)	Done FY 02-03	PBCE, ESD, PW, RDA
	2. Review and revise Redevelopment Agency Project Request for Proposal procedures as necessary to comply with revised Provision C.3. requirements. (Provision C.3.c.)	Done FY 03-04	ESD, PBCE, RDA
	3. Review and Revise Public Works Capital Improvement Project approval procedures and Road Improvement Project approval procedures as necessary to comply with revised Provision C.3. requirements. (Provision C.3.c.)	Done FY 02-03	PBCE, ESD, PW, RDA
B.	Review, evaluate, and modify the procedures, as necessary.	Done FY 03-04	PBCE, ESD, PW, RDA
C.	Begin tracking required data on the public projects subject to Provision C.3. hydraulic sizing criteria requirements for Annual Report.	Done FY 03-04 Ongoing	PBCE, PW, RDA
	1. Modify the existing data collection software for public projects to track new capitol improvement projects with stormwater treatment and/or HMP measures.	**FY 07-08**	**PW**
D.	Monitor development of City's Green Building program for opportunities to discourage architectural use of copper in development projects (Provision C.9.a.) and to incorporate urban runoff considerations.	Done FY 02-03 Ongoing	PBCE, ESD, PW, RDA

NRD 10 - City Staff Training

The City will provide training at least annually to its planning, building, and public works staff on planning procedures, policies, design guidelines, and BMPs for stormwater pollution prevention (C.3.a.vi).

#	Activities	Compliance Date	Responsible Party
A.	Provide training to Planning and Public Works staff on planning procedures, policies, design guidelines, and BMPs for stormwater pollution prevention. (Provision C.3.a.vi.)	Ongoing	PBCE, ESD, PW, RDA
B.	Provide training to Redevelopment Agency and Department of Transportation staff on planning procedures, policies, design guidelines, and BMPs for stormwater pollution prevention. (Provision C.3.a.vi.)	Ongoing	PBCE, ESD, PW, RDA, DOT
C.	Revise the training protocol to incorporate any newly adopted Provision C.3. permit requirements and related revised procedures.	As Needed	PBCE, ESD, PW, RDA
D.	Train staff responsible for design review on pest-resistant landscaping techniques and model conditions of approval and the importance of minimizing pesticide use in runoff from development sites. (Provision C.3.n. and Provision C.9.d.ii)	Ongoing	PBCE, ESD, PW, RDA, DOT

NRD 11 - Development Plan Review and Approval Procedures Effectiveness Evaluation

The City of San José will review and evaluate the effectiveness of its development plan review and approval procedures.

#	Activities	Compliance Date	Responsible Party
A.	Evaluate and incorporate any needed improvements in review and approval process.	Annually	PBCE, ESD, PW, RDA
B.	Document and evaluate what worked well and what needs improvement.	Annually	PBCE, ESD, PW, RDA

Construction Inspection

CON Work Plan

The City inspects activities at construction sites to prevent sediment and other pollutants from entering the storm sewer system. The measures and activities discussed in this work plan apply to both private development projects and municipal public works construction projects. These measures and activities are implemented at construction project sites as part of the City's construction inspection and enforcement program, which is implemented as a collaborative effort between inspectors from Public Works, Building, and Environmental Services. These departments also collaborate in providing outreach materials and training to the development community on appropriate best management practices. This program element is implemented pursuant to permit provision C.2.

Proper storm drain protection during construction prevents construction debris and sediment from entering the storm drain

CON 1 - Site Housekeeping

The City ensures through a construction inspection program that construction contractors properly store, use, and dispose of construction materials, chemicals, and wastes at construction sites, and prevent illicit discharges to storm drains and watercourses.

#	Activities	Compliance Date	Responsible Party
A.	Track and document incidents of housekeeping issues at construction sites.	Ongoing	PBCE-Bldg, PW, ESD-WE

CON 2 - Local Ordinance

For development projects with significant erosion potential and planned construction activity during the wet season, the City ensures, through a construction inspection program, that erosion and/or sediment control measures are implemented in accordance with local ordinances and project conditions of approval and maintained as needed during construction.

#	Activities	Compliance Date	Responsible Party
A.	Maintain a program for identifying and conditioning projects with significant erosion potential and planned wet season activity.	Ongoing	PW, PBCE-Bldg
B.	Identify ordinance changes needed to conduct inspections.	As Needed	PW, ESD-WE, PBCE-Bldg

CON 3 - Construction Inspection Frequency

The City inspects construction sites for adequacy of stormwater quality control measures. The frequency of inspections for active sites is at least once per month, or more frequently based on size of project, site conditions, precipitation, and project's potential impact on stormwater quality.

#	Activities	Compliance Date	Responsible Party
A.	Maintain and update SOPs for construction inspection program.	As Needed	PW, ESD-WE, PBCE-Bldg
B.	Document inspections of active construction sites.	Ongoing	PW, ESD-WE, PBCE-Bldg
C.	Evaluate the effectiveness of the construction inspection program and make improvements as necessary.	Annually	PW, ESD-WE, PBCE-Bldg

CON 4 - Wet Season Preparation

Prior to the beginning of the wet season each year, the City inspects all sites requiring erosion and/or sediment control plans, to ensure that measures have been taken to minimize erosion and discharges of sediment from disturbed areas.

#	Activities	Compliance Date	Responsible Party
A.	Review and revise procedures for construction inspection staff regarding wet season construction requirements.	As Needed	PW-CFAS, ECS, TDS, PBCE-Bldg, ESD
B.	Document pre-season inspection of construction sites to ensure adequate implementation of winterizing BMPs prior to the wet season.	Ongoing	PW-CFAS, ECS, TDS

CON 5 - Inspection and Site Evaluation Follow-up

Construction sites with inadequate erosion/sediment controls are given verbal or written notice of the inadequacies, according to the City's enforcement procedures, and followed up with action(s) commensurate with risk of pollutants entering City storm drains or waterways. Written notices and follow-up actions are tracked and summarized in the City's Annual Report to the Water Board.

#	Activities	Compliance Date	Responsible Party
A.	Implement SOPs for follow-up actions and graduated levels of enforcement for construction sites.	Ongoing	PW-CFAS, ECS, TDS, PBCE-Bldg, ESD
B.	Track and summarize notices and follow-up actions for annual reports.	Annually	PW-CFAS, ECS, TDS, PBCE-Bldg, ESD
	1. Use revised erosion and sediment control checklist to better track warnings and required corrections given to construction site managers.	**Done FY 06-07**	**PW-TDS**

CON 6 - Municipal Training

The City provides training annually to its construction inspection staff on inspection procedures, documentation, and enforcement related to stormwater pollution prevention. All inspectors receive training on the latest construction-related stormwater pollution prevention techniques and appropriate follow up actions at least once every two years. The City keeps documentation that inspectors have received training.

#	Activities	Compliance Date	Responsible Party
A.	Develop an annual training plan for construction inspection program.	Annually, Q1	ESD, PW, PBCE-Bldg
B.	Conduct annual training.	Ongoing	ESD, PW, PBCE-Bldg
C.	Track and document that inspectors have received training.	Annually	ESD-UR
D.	Evaluate the training curriculum and frequency, and make improvements as necessary.	Annually	ESD, PW, PBCE-Bldg
	1. Conduct additional stormwater BMP training for all inspection groups during section meetings throughout the year to supplement the main autumn annual training.	**Done FY 06-07** **Ongoing**	**ESD-UR, ESD-WE**
E.	Hold coordination meetings for Building, ESD, and Public Works inspectors.	Ongoing	PW-CFAS, ECS, TDS, PBCE-Bldg, ESD-WE, ESD-UR

CON 7 - Outreach

The City provides outreach materials to contractors, developers, and municipal staff on construction BMPs and compliance with the State General Construction Activity Storm Water Permit.

#	Activities	Compliance Date	Responsible Party
A.	Review outreach and technology transfer materials and make improvements, as necessary.	Annually, Q4	ESD, PW, PBCE-Bldg
	1. Reprint revised Dewatering from Construction Sites and In-Ground Utilities Maintenance Projects brochure.	**FY 07-08**	**ESD-UR**
B.	Conduct outreach sessions for development community.	Annually	ESD, PW, PBCE-Bldg, Program
C.	Document outreach to development community.	Annually	ESD-UR
D.	Evaluate outreach program and make improvements, as necessary.	Annually	ESD, PW, PBCE-Bldg
	1. Print and distribute revised “Clean Bay Blueprint” to developers and City inspectors.	Done FY 05-06	ESD, PW, PBCE-Bldg
	2. Explore the use of construction site signs to alert site employees and the public of stormwater pollution prevention message and 945-3000 hotline information.	FY 06-07	ESD, PW, PBCE-Bldg

#	Activities	Compliance Date	Responsible Party
	3. Implement, if feasible, the use of construction site signs to alert site employees and the public of stormwater pollution prevention message and 945-3000 hotline information, if feasible.	**FY 07-08**	**ESD, PW, PBCE-Bldg**

CON 8 - Public Works Projects

The City will develop and implement a process to ensure that contractors hired to construct public works projects have adequate erosion control plans and use appropriate Best Management Practices (BMPs) adopted by the Department of Public Works.

#	Activities	Compliance Date	Responsible Party
A.	Conduct training for Public Works capital improvement project staff (City Facilities Architectural Services; Roads and Bridges; and Engineering and Construction Services) on contract language, standard specifications, and enforcement.	Annually	PW-CFAS, ECS, TDS ESD
B.	Track the number of Public Work projects with these requirements.	Annually	PW-CFAS, ECS, TDS

CON 9 - Construction Inspection Effectiveness Evaluation

The City of San José will review and evaluate effectiveness of its construction inspection SOPs and BMPs.

#	Activities	Compliance Date	Responsible Party
A.	Evaluate and incorporate any needed improvements in construction inspection SOPs and BMPs.	Annually	PW-CFAS, ECS, TDS PBCE-Bldg ESD-WE ESD-UR
B.	Document and evaluate what worked well and what needs improvement.	Annually	PW-CFAS, ECS, TDS PBCE-Bldg ESD-WE ESD-UR
	1. Expand the number of sites with an inspector of record to capture more of the Type 1 and Type 2 sites (per Public Work's designation).	Ongoing	PBCE-Bldg

Public Streets, Roads, & Highways

PSR Work Plan

This program element is one of several that address municipal activities. The PSR program element consists of incorporating best management practices (BMPs) into City operations such as street repair. Training plays a key role in ensuring that staff uses the proper techniques during the course of their duties to protect water quality. Training topics and activities include spill response, resurfacing, sealing and patching, saw-cutting, street sweeping, landscape chemical application, concrete installation, pavement striping, legend removal, and catch basin inspection after irrigation repair. BMP effectiveness evaluation from crew members is obtained during the training sessions. This program element is implemented pursuant to permit provision C.2.

Department of Transportation paving crew applying their training along with the pavement

PSR 1 - Implementation of BMPs

The City of San José will implement Best Management Practices (BMPs) for street, road, and highway operation and maintenance (O&M) activities to reduce pollutants in stormwater and eliminate illicit discharges to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Develop additional BMPs, as needed, when new O&M tasks are instituted.	As Needed	DOT, ESD
B.	Develop SOPs based on BMPs.	As Needed	DOT, ESD
C.	When new BMPs and SOPs are developed, integrate BMPs and SOPs into training program.	As Needed	DOT, ESD
	1. Include SOPs listed in PSR 1.D.1 and developed in FY 05-06 into the FY 06-07 training program.	**FY 06-07**	**ESD**
D.	Staff will review current PSR and SDO BMPs and SOPs. The annual training sessions with staff will be used as an opportunity to evaluate the effectiveness of BMPs and SOPs. BMPs and SOPs will be updated as indicated by the review.	Done FY 04-05 Annually	DOT, ESD

#	Activities	Compliance Date	Responsible Party
	1. Revise or write the following SOPs: • Sidewalk/Plaza Maintenance: Cleaning, concrete installation and replacement, surface removal and repair; • Bridge and Structure Maintenance: Painting and paint removal, repair work, and graffiti removal; • Median and Road Embankment Maintenance; • Storm Drain Inlet Cleaning; • Storm Drain Line Cleaning; • Management of Storm Drain System Solid Waste; • Pump Station Inspection and Cleaning; • Drainage Ditch Cleaning.	~~6/30/06~~ **Done FY 05-06**	DOT, ESD, PRNS
	2. Include a check box on the WE ICID inspection report form to indicate whether the responsible party in a stormwater complaint is a City employee.	**FY 06-07** **Ongoing**	**ESD**
	3. In response to stormwater complaints involving a City employee conducting PSR and SDO O&M activities, the supervisor for the City employee involved in the complaint will be notified.	**FY 06-07** **Ongoing**	**DOT, GS, PRNS, ESD**

PSR 2 - Contractor Use of BMPs

The City of San José will develop and implement a process to ensure that contractors employed to perform street, road, and highway O&M activities use appropriate BMPs per URMP.

#	Activities	Compliance Date	Responsible Party
A.	Train contract managers for public street, road, and highway O&M contracts on related stormwater BMPs annually.	Annually	DOT, ESD
	1. Include a check box on the WE ICID inspection report form to indicate whether the responsible party in a stormwater complaint is a City contractor.	**FY 06-07** **Ongoing**	**ESD**
	2. In response to stormwater complaints involving City contractors conducting PSR and SDO O&M activities, the contract manager for the City contract involved in the complaint will be notified.	**FY 06-07** **Ongoing**	**DOT, GS, PRNS, ESD**
B.	Develop standard contract language for PSR maintenance activities.	Done FY 05-06	DOT, ESD
	1. Send letters to City contractors conducting PSR and SDO O&M activities with a reminder to use appropriate BMPs while conducting their work.	**FY 06-07**	**DOT, GS, PRNS, ESD**

PSR 3 - City Staff Annual Training

The City of San José will provide annual training to its municipal staff in the use of appropriate BMPs. The City will also provide a mechanism for obtaining feedback from staff on the implementation and effectiveness of the BMPs and Control Measures.

#	Activities	Compliance Date	Responsible Party
A.	Identify training goals, such as improving the focus of the training on the specific BMPs used by a section; integrating new BMPs, if any; etc.	Annually, Q4	DOT, ESD
B.	Identify training opportunities (which could include tailgate meetings and other existing training).	Annually	DOT, ESD
C.	Create or revise training modules for affected City staff and contractors.	As Needed	DOT, ESD
	1. Add specific components from DOT Electrical Crew training module to the general DOT Street Crew training module. These components include: asphalt/concrete removal, concrete installation and repair, and mercury lamp recycling and/or disposal.	~~6/30/06~~ **Done FY 05-06**	ESD
D.	Create or revise collateral material based on training modules.	As Needed	DOT, ESD
E.	Schedule training with affected supervisors.	Annually	DOT, ESD
	1. Develop and implement a new training module specifically for DOT electrician staff.	Done FY 04-05	DOT, ESD

PSR 4 - Notification of Public Agencies

The City of San José will inform other parties (e.g., CalTrans, the County of Santa Clara, and public utilities) conducting street, road, and highway O&M activities within its jurisdiction of the requirements to implement pollutant reduction BMPs and Control Measures in stormwater to the maximum extent practicable and eliminate illicit discharges.

#	Activities	Compliance Date	Responsible Party
A.	Identify conditions under which another agency will be notified regarding relevant stormwater requirements.	Done FY 02-03	
	1. Include a check box on the WE ICID inspection report form to indicate whether the responsible party in a stormwater complaint is another agency.	**FY 06-07**	**ESD**
	2. The City will send letters to other agencies that conduct PSR O&M activities within its jurisdiction informing them of the requirement to implement appropriate BMPs and control measures while conducting their work.	**FY 06-07**	**ESD-WE**

PSR 5 - BMP Effectiveness Reviews

As part of the annual review process, the City of San José will review and evaluate the effectiveness of its BMPs in reducing pollutants in stormwater and eliminating illicit discharges. The review and evaluation will include input from the municipal maintenance staff that implement the BMPs.

#	Activities	Compliance Date	Responsible Party
A.	Draft procedure for annual effectiveness reporting, including sub-procedures for gathering feedback from affected supervisors and for modifications to BMPs and SOPs as necessary.	Done FY 01-02	
	1. Review procedures for annual effectiveness evaluation. Consider obtaining feedback from supervisors on how to assess BMP effectiveness and the use of training sessions with staff as an opportunity to evaluate BMPs and SOPs.	Annually	DOT, ESD
B.	Conduct evaluation of BMPs and SOPs.	Annually	DOT, ESD
C.	**Expand parking restriction signage and enforcement for street sweeping by 40 curb miles each fiscal year.**	**FY 06-07** **Ongoing**	**DOT**
D.	**Collect street sweeping data: volume and/or weight of debris collected, curb miles swept, and estimated percentage of leaves in yard trimmings collection program.**	**Ongoing** **[See CNAP CB-11]**	**DOT, ESD**

PSR 6 - Rural Public Works Maintenance and Support Activities

The City will extend its control measure strategy for PSR to address water quality impacts resulting from public works maintenance and support activities in rural areas.

#	Activities	Compliance Date	Responsible Party
A.	Identify City-owned properties that are applicable (under the RPW performance standard).	Ongoing	
	1. Re-evaluate the feasibility of using GIS information to identify additional applicable properties, if any.	~~6/30/06~~ **Done FY 05-06**	PRNS, GS, DOT, ESD
B.	Develop or adapt Standard Operating Procedures (SOPs) and Best Management Practices (BMPs) for rural public works activities.	Done FY 03-04	
C.	Provide annual training on appropriate SOPs/BMPs to City staff that perform rural public works operations and maintenance activities. Incorporate SOPs/BMPs evaluation into annual training.	Annually	PRNS, DOT, GS, ESD
	1. Evaluate the RPW training schedule in order to coordinate more efficiently with PRNS staff schedules.	**FY 06-07**	**PRNS, ESD**
D.	Through contract specifications, require contractors hired by the City to use appropriate SOPs/BMPs when performing rural public works construction or maintenance.	Done FY 05-06	PRNS, DOT, GS, ESD
E.	Annually conduct an evaluation of the effectiveness of the rural public works program, report the results in the Urban Runoff Annual Report. Identify items for continuous improvement.	Annually	PRNS, DOT, GS, ESD

Storm Drain System Operation & Maintenance

SDO Work Plan

Department of Transportation Vactor crew cleaning out a storm drain inlet

Storm Drain System Operation and Maintenance is another municipal activity program element implemented in accordance with provision C.2.a of the permit. This program includes key maintenance activities that are conducted to ensure the proper function of the storm sewer system to collect and convey storm runoff. The Department of Transportation Standard Operating Procedures for catch basin cleaning and Problem Area Reporting are a focus of crew training. A GIS map overlay has been created that assigns serial numbers to each of the City's more than 28,500 storm drain inlets. This map overlay is currently in use as a means to facilitate problem area reporting in the storm drain system.

SDO 1 - O&M BMP Implementation

The City of San José will implement best management practices (BMPs) for the storm drain system operation and maintenance (O&M) to reduce pollutants in stormwater to the maximum extent practicable. Specific BMPs for each type of O&M activity are those listed in the City's Urban Runoff Management Plan (URMP).

#	Activities	Compliance Date	Responsible Party
A.	Develop additional BMPs, as needed, when new O&M tasks are instituted (including structural controls if necessary).	As Needed	DOT, ESD
B.	Develop SOPs based on BMPs.	As Needed	DOT, ESD
C.	When new BMPs and SOPs are developed, integrate BMPs and SOPs into training program.	As Needed	DOT, ESD
	1. Include SOPs listed in SDO 1.D.1 and developed in FY 05-06 into the FY 06-07 training program.	**FY 06-07**	**ESD**
D.	Staff will review current PSR and SDO BMPs and SOPs. The annual training sessions with staff will be used as an opportunity to evaluate the effectiveness of BMPs and SOPs. BMPs and SOPs will be updated as indicated by the review.	Done FY 04-05 Annually	DOT, ESD

#	Activities	Compliance Date	Responsible Party
	1. Revise or write the following SOPs: • Sidewalk/Plaza Maintenance: Cleaning, concrete installation and replacement, surface removal and repair; • Bridge and Structure Maintenance: Painting and paint removal, repair work, and graffiti removal; • Median and Road Embankment Maintenance; • Storm Drain Inlet Cleaning; • Storm Drain Line Cleaning; • Management of Storm Drain System Solid Waste; • Pump Station Inspection and Cleaning; • Drainage Ditch Cleaning. See PSR 1.D.1	~~6/30/06~~ **Done FY 05-06**	DOT, ESD, PRNS
	2. Include a check box on the WE ICID inspection report form to indicate whether the responsible party in a stormwater complaint is a City employee.	**FY 06-07** **Ongoing**	**ESD**
	3. In response to stormwater complaints involving a City employee conducting PSR and SDO O&M activities, the supervisor for the City employee involved in the complaint will be notified.	**FY 06-07** **Ongoing**	**DOT, GS, PRNS, ESD**

SDO 2 - Problem Tracking and Process Improvement

The City of San José will develop and implement processes for tracking problem areas and ensuring that appropriate BMPs and SOPs will be implemented for storm drain operation and maintenance activities.

#	Activities	Compliance Date	Responsible Party
A.	Implement an annual inspection and cleaning work plan to achieve a Tier II level review.	Ongoing	DOT
B.	Evaluate criteria for collecting data from City field personnel for the purposes of determining Problem Areas.	As Needed	DOT, ESD
C.	Revise documentation and problem area reporting procedure, if necessary, to improve reporting performance. Documentation to include frequency, nature, and type of recurring problem. Include coordination of data from ICID and Storm Drain Management System data sources. Include analysis of data to identify trends for targeting solutions.	As Needed	DOT, ESD
D.	Produce Problem Area report.	Annually	DOT
E.	Address Problem Areas through ICID enforcement/ education activities, additional BMP development, program development or retrofit.	As Needed	DOT, ESD
	1. Explore purchasing additional vactor trucks.	**FY 06-07**	**DOT**

SDO 3 - Contractor Use of BMPs

The City will develop and implement, as needed, a process to ensure that contractors employed to perform storm drain O&M activities use the appropriate BMPs.

#	Activities	Compliance Date	Responsible Party
A.	Train contract managers for SDO O&M contracts on related stormwater BMPs.	Annually	DOT, ESD
	1. Include a check box on the WE ICID inspection report form to indicate whether the responsible party in a stormwater complaint is a City contractor.	**FY 06-07** **Ongoing**	**ESD**
	2. In response to stormwater complaints involving City contractors conducting PSR and SDO O&M activities, the contract manager for the City contract involved in the complaint will be notified.	**FY 06-07** **Ongoing**	**DOT, GS, PRNS, ESD**

SDO 4 – Staff Training and BMP Feedback

The City of San José will provide annual training to its municipal staff in use of appropriate BMPs and/or Control Measures. The City will also provide a mechanism for obtaining feedback from staff on implementation and effectiveness of BMPs and Control Measures.

#	Activities	Compliance Date	Responsible Party
A.	Provide training prior to the rainy season.	Annually, Q4	DOT, ESD
B.	Create or revise training modules for affected City staff.	As Needed	DOT, ESD
	1. Improve the focus of the training on the specific BMPs used by a section.	As Needed	DOT, ESD
	2. Provide specific training to inlet cleaning crews on IMSPAR data collection in advance of inlet cleaning program implementation.	Annually	
	3. Add specific components from DOT Electrical Crew training module to the general DOT Street Crew training module. These components include: asphalt/concrete removal, concrete installation and repair, and mercury lamp recycling and/or disposal.	~~6/30/06~~ **Done FY 05-06**	ESD
C.	Produce schedule for training.	Annually	DOT, ESD

SDO 5 – Data Analysis

As part of the annual review process, the City of San José will evaluate data regarding cleaning activities and unusual flows observed during inspection. The review and evaluation will include consideration of storm drain structural retrofit.

#	Activities	Compliance Date	Responsible Party
A.	Draft procedure for annual review and evaluation of data.	Done FY 01-02	
	1. Collect data on the amount of materials removed during inlet cleaning.	Done FY 04-05 Annually	DOT, ESD

#	Activities	Compliance Date	Responsible Party
B.	Implement annual data review and identify follow-up actions as appropriate.	Annually	
	1. ~~Evaluate~~ **Re-evaluate** how follow up is conducted by crews when "cars on catch basins" is identified on the IMSPAR report, in order to better understand to what extent parked cars are barriers to cleaning.	~~6/30/06~~ **FY 06-07**	DOT, ESD
	2. **Evaluate "cars on catch basins" data to see if it can be used as one of the factors in determining where future posted signage for street sweeping restrictions will be installed.**	**FY 06-07**	**DOT, ESD**
	3. ~~2.~~ Evaluate how to integrate the results of the IMSPAR report, regarding garbage and high debris, into scheduling additional cleaning.	~~6/30/06~~ **Annually**	DOT, ESD
	4. ~~3. Evaluate~~ **Re-evaluate** use of hand held devices to collect data during storm drain inlet cleaning and potentially other maintenance activities.	~~6/30/06~~ **FY 07-08**	DOT, ESD

SDO 6 – BMP Effectiveness Reviews

As part of the annual review process, the City of San José will review and evaluate the effectiveness of its BMPs in reducing pollutants in stormwater and eliminating illicit discharges.

#	Activities	Compliance Date	Responsible Party
A.	Review with supervisors to get feedback and information on how to assess BMP effectiveness.	As Needed	DOT, ESD
B.	Use annual training sessions with staff as an opportunity to evaluate the effectiveness of BMPs & SOPs.	Annually	DOT, ESD

Water Utilities Operations & Maintenance

WUO&M Work Plan

This program element addresses a municipal activity and is implemented in accordance with provision C.2.a. The program addresses operation and maintenance activities at the City's Municipal Water system. The key tools for implementing this program are the Water Utility Pollution Prevention Plan and staff training to ensure that proper techniques are employed during maintenance activities. The City's training program includes the annual development of a video demonstrating the implementation of BMPs for a specific work function.

Pumps at the Rincon II Pump Station

WUO&M 1 – Inventory of O&M Activities

The City of San José's Municipal Water System will conduct an inventory of all-key operations and maintenance activities, and identify routine and unplanned non-storm water discharges from these activities. This inventory will be conducted every three years and evaluated at least once a year.

#	Activities	Compliance Date	Responsible Party
A.	Review current procedures for operations and maintenance.	Annually	ESD-Muni
B.	Three-year update of list.	**Done 03/31/06** **03/31/09**	ESD-Muni

WUO&M 2 – Implementation of WUPPP

The City of San José's Municipal Water System will implement the pollution control measures identified in the Water Utility Pollution Prevention Plan (WUPPP) to manage chlorine, biocides, and algaecides and prevent erosion and sedimentation.

#	Activities	Compliance Date	Responsible Party
A.	Implement WUPPP/Report on activities**.**	Ongoing	ESD-Muni

WUO&M 3 – Staff Training and Contractor WUPPP Compliance

The City of San José's Municipal Water System will conduct annual training for municipal staff and coordinate WUPPP elements with water utility project planning, including WUPPP elements (BMPs, conditions, specifications, etc., in contract and services agreements).

#	Activities	Compliance Date	Responsible Party
A.	Implement training program.	Annually, Q2	ESD-Muni

WUO&M 4 – WUPPP Effectiveness Evaluation

The City of San José's Municipal Water System will evaluate the effectiveness of the WUPPP annually. Maintain accurate documentation and revise the WUPPP as necessary.

#	Activities	Compliance Date	Responsible Party
A.	Evaluate effectiveness of program.	Annually, Q4	ESD-Muni

Pesticide Management

PM Work Plan

Tussock Moth infestation on an oak tree at Williams Street Park

The purpose of the Pesticide Management program is to reduce the amount of pesticides in stormwater and landscape runoff. Activities include setting municipal policy, implementing proper techniques when selecting and applying pesticides on City property, staff training, public education, and City participation in regional efforts to influence regulations that affect pesticide management. In 2003, the Council adopted an Integrated Pest Management (IPM) Policy, which calls for municipal operations to incorporate IPM techniques and to reduce, phase-out, and ultimately eliminate the use of pesticides that cause impairment of surface waters. The City continues to implement pest control BMPs and train staff on Integrated Pest Management (IPM) techniques. This program element is implemented pursuant to permit provision C.9.d.

PM 1 – Integrated Pest Management

The City will adopt an Integrated Pest Management (IPM) policy and/or ordinance requiring use of IPM techniques in the agency's operations and minimization of pesticide use, particularly organophosphate and copper-based pesticides, by agency staff and contractors.

#	Activity	Compliance Date	Responsible Party
A.	Develop a City IPM policy for inclusion in Pesticide Management Plan.	Done FY 02-03	**GS, DOT, ESD, PRNS**

PM 2 – Pesticide Management Plan

The City will develop and implement a Pesticide Management Plan with the goals of minimizing pesticide use and reducing the amount of pesticides in stormwater and landscape runoff to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Draft a City of San José Pesticide Management Plan.	Done FY 01-02	**GS, DOT, ESD, PRNS**
B.	Publish City Pesticide Management Plan in URMP.	Done FY 01-02	**ESD**

PM 3 – IPM SOPs and BMPs

The City will develop and implement standard operating procedures (SOPs) and best management practices (BMPs) for implementing the IPM Policy.

#	Activities	Compliance Date	Responsible Party
A.	Develop SOPs and BMPs for implementing IPM policy with provisions that will reduce water quality impacts from pesticide use.	Done FY 01-02	**GS, DOT, ESD, PRNS**
B.	For each type of pest problem identified, seek model SOPs and BMPs from published literature.	Done FY 01-02	**GS, DOT, ESD, PRNS**
C.	Incorporate or develop appropriate IPM measures into City SOPs and BMPs.	Done FY 02-03	**GS, DOT, ESD, PRNS**
	1. Pilot the use of additional IPM techniques, e.g., for weed control.	Done FY 06-07 Ongoing	GS, DOT, ESD, PRNS
D.	Update City URMP to incorporate model Pest Management Performance Standard, including description of legal authority (IPM policy and contract language), work plan elements, BMPs, and SOPs needed for implementation.	Done FY 02-03	**GS, DOT, ESD, PRNS**
E.	Review and update City SOPs and BMPs, as appropriate.	As Needed	GS, DOT, ESD, PRNS
F.	Develop Approved Pesticide List for applications on City property.	FY 06-07 **Ongoing**	GS, DOT, ESD, PRNS
	1. Revise SOPs and BMPs to reflect use of Approved Pesticide List.	FY 06-07 **Ongoing**	GS, DOT, ESD, PRNS

PM 4 – City Employee Training

The City will ensure that employees receive pest management training by implementing the following:

1. Employees who apply pesticides for the City will obtain the appropriate training as required by the County Agricultural Commissioner and State Department of Pesticide Regulation (DPR);
2. Employees within departments responsible for pesticide application will receive annual training on appropriate portions of City IPM Policy, SOPs, and BMPs, and latest IPM techniques;
3. Employees who are not authorized to apply pesticides will be annually trained not to use over-the-counter pesticides at workplace, consistent with IPM Policy; and
4. Annual internal outreach will be conducted to employees, who do not necessarily purchase or apply pesticides during their course of work, on less toxic pest control and to encourage employees to use IPM techniques away from work.

#	Activities	Compliance Date	Responsible Party
A.	Ensure that employees who apply pesticides for the agency obtain appropriate training required by County Agricultural Commissioner and State Department of Pesticide Regulation.	Annually	GS, DOT, PRNS

#	Activities	Compliance Date	Responsible Party
B.	Provide annual training on IPM Policy, SOPs, and BMPs, and latest IPM techniques to employees within departments responsible for pesticide application.	Annually	GS, DOT, ESD, PRNS
C.	Annually inform employees who are not authorized / trained to apply pesticides not to use over-the-counter pesticides at workplace, consistent with IPM Policy.	Ongoing	GS, DOT, ESD, PRNS
D.	Monitoring Mechanism I.B.1. Document and evaluate effectiveness of staff training conducted each year in annual report.	Annually	GS, DOT, ESD, PRNS
	1. Update class evaluation/survey for IPM training classes conducted by City staff.	As Needed	GS, DOT, ESD, PRNS
E.	Public Education and Outreach Task II.A.14 Conduct internal outreach on less toxic pest control to employees who do not necessarily purchase or apply pesticides during the course of their work (to encourage employees to use IPM techniques away from work).	Annually	ESD

PM 5 – Contractor Pesticide Management Requirements

The City will develop and implement a process to ensure that contractors employed to conduct pest control and pesticide application on municipal property engage in pest control methods consistent with City IPM Policy. Specifically, the City will require contractors to:

- follow City IPM policy, BMPs, and SOPs;
- provide evidence of current IPM training, when feasible; and
- provide documentation of pesticide use on City property to the City in a timely manner.

#	Activities	Compliance Date	Responsible Party
A.	Ensure that contractors employed to conduct pest control/pesticide application on municipal property engage in methods consistent with City IPM policy.	Ongoing	GS, DOT, ESD, PRNS, PW, ~~RDA~~
B.	Review and update a list of all contractors employed by the City who perform pesticide application work.	Annually	GS, DOT, ESD, PRNS, PW, ~~RDA~~
C.	Implement a procedure to provide to each contractor a copy of the City's IPM policy.	Done FY 02-03	**GS, DOT, ESD, PRNS**
D.	City will supply copies of pest specific BMPs and SOPs to contractors. Contractors will self-certify their compliance with the City SOPs and BMPs.	Ongoing	GS, DOT, ESD, **PRNS**
E.	Require through contract specifications that PCOs contracted for municipal applications use pest control methods consistent with City's IPM Policy. Specifically, require contractors to: a) follow City IPM policy, BMPs and SOPs; b) provide evidence of current IPM training, when feasible; and c) provide documentation of pesticide use on City property to the City in a timely manner.	Ongoing	GS, **DOT, ESD, PRNS**
	1. City will develop standard content for PCO contracts.	Done FY 04-05	**GS, DOT, ESD, PRNS**

#	Activities	Compliance Date	Responsible Party
	2. City will implement standard content for PCO contracts.	**Done** FY 05-06 **Ongoing**	GS, DOT, ESD, PRNS
F.	Invite contractors to participate in City training sessions on pesticide management.	Done FY 05-06 Ongoing	GS, DOT, **ESD**, PRNS
G.	Monitoring Mechanism III.A.1. Document number of PCOs receiving presentations and/or training on pesticide use on municipal property.	Annually	GS, **DOT**, ESD, **PRNS**

PM 6 – Pesticide Management Outreach

The City will identify in the annual work plan the outreach activities it will conduct consistent with Program Pesticide Management Plan. Work plan elements will address outreach to residential and commercial pesticide users, pesticide retailers, and special districts. Information will be provided on less-toxic pest control practices, proper disposal of pesticides, and the City's own IPM practices, as applicable.

#	Activities	Compliance Date	Responsible Party
A.	Increase awareness of target audiences regarding proper pesticide use, disposal methods, water quality impacts, and less toxic pest management messages. Target audiences include commercial and residential pesticide users, pesticide retailers, municipal employees, and special districts.	Ongoing	ESD
B.	Prepare IPM stories and press releases to local media.	As Needed	ESD
C.	In conjunction with Program, City will provide information on less toxic pest control (e.g., IPM techniques, municipal IPM policies, model contract language, training opportunities, etc.) to neighboring special districts (e.g., VTA, sanitary and utility districts, open space districts, vector control districts, and school districts) as appropriate.	As Needed	ESD
D.	Create and provide fact sheets and materials to pesticide retailers to facilitate point-of-purchase outreach to support IPM Store Partnership Program.	Ongoing	ESD
E.	Monitoring Mechanism: Document or estimate numbers of residents reached by outreach efforts, including events, web promotion, municipal employee outreach, and media advertising. Monitor responses to outreach efforts by documenting calls to the Program's general and watershed campaign hotlines.	Annually	ESD
F.	**Co-host regional IPM conference to promote implementation of IPM practices in municipal operations in the City and Bay Area region.**	**Done FY 06-07**	**GS, DOT, ESD, PRNS**
G.	Monitoring Mechanism IV.A.1. Document outreach efforts targeting businesses, recommended in the work plan, to be developed by the Program. Implement evaluation component of the work plan.	Annually	ESD

PM 7 – HHW Pesticide Disposal

The City will coordinate with household hazardous waste (HHW) collection agencies to support, enhance, and help publicize programs for proper pesticide disposal.

#	Activities	Compliance Date	Responsible Party
A.	Work with HHW collection agencies to support, enhance, and publicize programs for pesticide disposal.	Ongoing	ESD
B.	Ensure that adequate pesticide disposal services exist for residents and conditionally exempt small quantity commercial generators.	Annually	ESD
C.	Provide hazardous waste disposal information to residents, through distribution of materials (e.g., utility bill insert, city newsletter, community events, etc.) or advertising in local media.	Ongoing	ESD
D.	Monitoring Mechanism V.A.1. Document that HHW collection programs adequately serve residents and businesses and that exchange programs do not exchange organophosphate or banned pesticides.	Annually	ESD

PM 8 – City Pesticide Use Tracking

The City will develop and implement a process for tracking pesticide use on municipally-owned property.

#	Activities	Compliance Date	Responsible Party
A.	Develop and implement a pilot pesticide tracking process for Diazinon and Chlorpyriphos products.	Done FY 01-02	**GS, DOT, ESD, PRNS**
B.	Track pesticide use on municipally owned property. Include reporting and justification for use of OP pesticides and BMPs employed during OP pesticide use.	Ongoing	GS, DOT, ESD, **PRNS**
	1. Evaluate feasibility of implementing electronic data management system for pesticide use.	Done FY 04-05	**GS, DOT, ESD, PRNS**
	2. Implement electronic data management system for tracking pesticide use on City property.	Done FY 05-06 Ongoing	GS, DOT, ESD, **PRNS**
C.	Monitoring Mechanism I.A.1. Document completion of tasks in annual reports. Use pesticide tracking process to document pesticide use.	Annually	GS, DOT, ESD, PRNS, PW, ~~RDA~~

PM 9 – City Pesticide Inventory Search

The City will conduct periodic City-wide search of its chemical inventory for pesticides no longer legal for application per EPA, State, and/or local requirements. If found, these pesticides will be properly disposed of pursuant to appropriate waste disposal regulations.

#	Activities	Compliance Date	Responsible Party
A.	Conduct Citywide search of chemical storage areas for pesticides no longer legal for application per EPA, State, and/or local requirements. Properly dispose of any such pesticides pursuant to appropriate waste disposal regulations.	Annually	GS, DOT, PRNS

PM 10 – Pesticide Management Plan / IPM Policy Review

As part of annual reporting process and with input from municipal staff, the City will review and evaluate the effectiveness of its Pest Management Plan and IPM Policy in achieving the goals of the Plan to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Review and continuously improve goals, actions, and monitoring mechanisms of the work plan considering results of self-evaluations, comments from Water Board staff and other interested parties, and results of local performance review meetings, if any.	Annually	GS, DOT, ESD, PRNS, PW, ~~RDA~~
B.	Monitoring Mechanism IX.A.1. Complete revised work plan that incorporates continuous improvement items, and report on completion of work plan tasks.	Annually	GS, DOT, ESD, PRNS, PW, ~~RDA~~
C.	Monitoring Mechanism VII.A.1. Summarize types of pesticide reduction measures required (such as by conditions of approval) for new development and significant redevelopment projects, and percentage of new development/ significant redevelopment projects for which pesticide reduction measures were required. (Draft Permit Provision C.3.n.)	Annually	PW, ESD, ~~RDA~~

Mercury

M Work Plan

The City continues its efforts to reduce or eliminate mercury discharges during municipal operations. Virtual elimination practices employed by the City include: purchasing low mercury-containing fluorescent lamps, recycling spent lamps, recycling spent batteries, and switching to non-mercury-containing apparatus in the Water Pollution Control Plant Laboratory. In 2003, the Program approved a Guidelines document on the management of mercury-containing products by a municipal agency. The City will continue to implement management practices consistent with the guidelines such as collecting and recycling spent fluorescent lamps, batteries, and other electronic wastes. This program element is implemented pursuant to permit provision C.9.c.

Fluorescent lamps for recycling at the Central Service Yard

M 1 – Municipal Use of Mercury-Containing Products

The City will eliminate all unnecessary municipal use of mercury-containing products and establish proper disposal methods for products that cannot be eliminated.

#	Activities	Compliance Date	Responsible Party
A.	Implement SCVURPPP guidelines for mercury-containing products reduction and management. These guidelines include a schedule for the timely phase-out of mercury-containing products identified for virtual elimination as well as reporting requirements, possibly to track recycling, replacement, and reduction in use of mercury-containing products.	Ongoing	ESD, GS
	1. Collect and dispose of mercury-containing lamps generated in City-owned facilities.	Ongoing	GS, ESD
	2. Identify other mercury-containing products for virtual elimination, phase-out and/or proper disposal.	Annually, As Needed	ESD, GS
B.	Monitoring Mechanism I. Document completion of tasks in annual reports. Use mercury-containing product reporting guidelines.	Annually	ESD

M 2 – Household Hazardous Waste Collection

The City will support mercury-containing product disposal services through universal waste and household hazardous waste (HHW) collection programs for residents and small businesses, and encourage use of these programs.

#	Activities	Compliance Date	Responsible Party
A.	Provide mercury-containing products disposal services for residents and small businesses.	Ongoing	ESD-IWM, **County**
B.	Work with Program and HHW collection agencies to develop and help publicize fluorescent light recycling program.	Ongoing	ESD, Program

M 3 – Monitoring and Science

The City will participate in coordinated monitoring efforts to support mercury TMDL development and implementation, including assessment of air pollution sources of mercury and concentrations of mercury in sediment.

#	Activities	Compliance Date	Responsible Party
A.	Continue financial support of the Regional Monitoring Program (RMP). Continue to actively participate in the RMP steering committee and technical review committee.	Ongoing	ESD
B.	~~The City of San José will continue to provide in-kind services for the maintenance of the Mercury Deposition Network site near San José through calendar year 2006.~~ **Examine feasibility of enhancing stormwater pollution prevention and control activities on a watershed or sub watershed basis to focus activities in those parts of the Guadalupe River Watershed enriched in mercury from natural or mining-related causes.**	~~12/31/05~~ ~~12/31/06~~ **FY 07-08**	ESD

M 4 – Regional, State, and Federal Coordination

Actively participate in regional, state, and federal coordination efforts to achieve a reduction in the amount of mercury in urban runoff and air emissions.

#	Activities	Compliance Date	Responsible Party
A.	Collaborate in technical studies to support TMDL development and implementation including the Santa Clara Basin WMI Guadalupe River Mercury TMDL Workgroup, RMP, and the CEP.	Ongoing	ESD
B.	Support and participate in WMI Watershed Action Plan implementation.	Ongoing	ESD

M 5 – Public Education and Outreach

Increase awareness of proper disposal of mercury-containing products and available non-mercury containing alternatives. Target audiences include residential, commercial, and industrial users and municipal employees.

#	Activities	Compliance Date	Responsible Party
A.	Coordinate with Program and HHW collection agencies ~~to develop and~~ implement a mercury-containing product outreach program to educate selected target audience and encourage proper use and disposal of mercury-containing products.	Ongoing	ESD, Program, County HHW
B.	Coordinate with municipal inspectors to integrate mercury outreach to industrial businesses into their existing routine pretreatment, source control, and/or hazardous materials inspection processes.	Ongoing	ESD
C.	Attend community events and distribute outreach materials. (See Attachment A: Outreach Activities Summary)	Ongoing	ESD
D.	Monitoring Mechanism V.B. Document and evaluate each outreach activity, including the target audience and number of residents and/or businesses reached.	Annually	ESD, Program

Copper / Nickel Action Plans

CNAP Work Plan

This element is implemented pursuant to provisions C.9.a and b of the stormwater permit. Activities in the copper and nickel action plans are attributed largely to the South Bay POTWs and to SCVURPPP as the responsible entities. Some activities, however, require specific actions by SCVURPPP Co-Permittees or specified municipalities, such as increasing awareness of copper and nickel with businesses that are also NOI filers (please see IND 1 for a description of NOI filers). Summarized here are activities pursuant to implementation of the baseline actions included in the Copper and Nickel Action Plans. These are in addition to those undertaken by SCVURPPP as a program. A complete update on implementation of the Action Plans can be found in the SCVURPPP Annual Report.

CB-1 – Vehicle Washing Operations

#	Activities	Target Date	Responsible Party
A.	Have member of San José team trained and available to lead mobile cleaners' certification seminar.	As Needed	
B.	Support Program in hosting mobile cleaners' certification seminar.	**Done** FY 06-07	ESD
	1. Promote list of recognized mobile cleaning service providers.	Ongoing	ESD
~~C.~~	~~Distribute coupons in support of Program partnership with Western Car Wash Association.~~	~~As needed, dependant on Program activities~~	~~Program, ESD~~

CB-3 – Industrial Discharges

#	Activities	Target Date	Responsible Party
A.	Continue Distribution of information regarding copper from roof vents.	Ongoing	ESD
	1. Continue rooftop inspections. Evaluate efforts and need for any additional effort.	Done FY 05-06	ESD
B.	Mail NOI Package, with information on the GIASP and how to comply, to targeted industrial facilities.	~~6/30/06~~ **Done FY 05-06**	ESD

CB-8 – Watershed Assessments and New Development

#	Activities	Target Date	Responsible Party
A.	**Review new and redevelopment project review procedures and update or refine procedures to minimize copper pollution.** See NRD section**s 3, 4, and 9** for details on San José's implementation of C.3 permit provisions.	**Done FY 02-03**	**ESD, PBCE, PW, RDA**

CB-11 – Street Sweeping and Storm System O&M

#	Activities	Target Date	Responsible Party
A.	Track quantitative data on the tons of material removed and disposed of and other relevant street sweeping program data.	Annually	ESD-IWM DOT

CB-12 – Pools and Spas

#	Activities	Target Date	Responsible Party
A.	Distribute outreach materials at events, public counters, and post on City website.	Ongoing	ESD
B.	Provide guidance to residents on disposal alternatives for pool and spa water.	Ongoing	ESD

CB -21 – Architectural Use of Copper

#	Activities	Target Date	Responsible Party
A.	Continue to discourage architectural use of copper during Planning application review.	Ongoing	PBCE-Planning
B.	Continue to monitor progress of San José Green Building program to identify opportunities for discouraging architectural use of copper.	Ongoing	PBCE-Planning ESD-P&P

NB-1 – Discharges from Construction sites

#	Activities	Target Date	Responsible Party
A.	~~See NRD and CON program elements for activities that address erosion control.~~ **Implement performance standards for construction inspection.**	**See NRD 6 and CON program element for activities that address erosion control.**	**ESD, PBCE, PW**
B	**Participate in the Water Board's regional training of construction site inspectors.**	**See NRD 6 and CON program element for activities that address erosion control.**	**ESD, PBCE, PW**

Trash

TRA Work Plan

Volunteers removing trash from Coyote Creek behind San Jose High Academy

The purpose of the Trash program is to address litter and illegal dumping that threatens to pollute urban waterways. The impetus for this program was the 2001 Water Board Staff Report recommending that all urban creeks, lakes, and shorelines be placed on a monitoring list due to the threat of trash impairment to water quality. The City's activities focus on assistance with the development and implementation of an effective trash strategy, ongoing trash evaluations in high priority areas, implementation or refinement of trash management practices, and piloting the use of structural controls for trash. This program element is implemented pursuant to the Program's Trash Work Plan and provision C.1 of the permit.

TRA 1 – Inventory, Document and Evaluate Trash Management Practices

#	Activities	Target Date	Responsible Party
A.	Complete Program survey of existing trash management practices.	Done FY 03-04	ESD

TRA 2 – Document and Map Known Trash Problem Areas

#	Activities	Target Date	Responsible Party
A.	Identify data sources and information showing the location of known trash problem areas (e.g., trash complaints/ incidents and eradication efforts).	Done FY 03-04	ESD
B.	Compile trash problem location data/information and submit to Program for conversion to coordinates for GIS mapping.	Done FY 03-04	ESD
C.	Revise and update documentation (list of locations, maps, etc.) of known trash problem areas.	As Needed	ESD
D.	Continue identifying and prioritizing trash problem areas in urban streams and waterways and other potential sources that may contribute trash to those areas.	Annually	ESD, PRNS, DOT, PD

TRA 3 – Conduct Trash Evaluations

#	Activities	Target Date	Responsible Party
A.	Work with Program to select trash evaluation methodology.	Done FY 03-04	ESD

#	Activities	Target Date	Responsible Party
B.	Assist Program with planning and organizing of training workshop for municipal staff.	Done FY 03-04	ESD
C.	Participate in the trash evaluation methodology training workshop.	Done FY 03-04	ESD
D.	Conduct trash evaluations and submit to Program staff.		ESD
	1. Coyote Watershed	Done FY 04-05	ESD
	2. Remaining San José locations	**Done** FY 05-06	ESD
E.	Continue trash evaluations in high priority areas using the Program's Urban Rapid Trash Assessment protocol (version 1.0) and/or the KAB litter index in a subset of trash problem areas to track changes over time.	Ongoing	ESD

TRA 4 – Develop Standardized Documentation and Reporting Format

#	Activities	Target Date	Responsible Party
A.	Work with Program to develop a reporting format to document trash management activities in Annual Reports.	Done FY 03-04	ESD

TRA 5 – Document and Analyze Evaluation Results; Identify and Prioritize Trash Problem Areas

#	Activities	Target Date	Responsible Party
A.	Assist Program staff with the documentation and analysis of trash evaluation results.	Ongoing	ESD
B.	Identify high priority trash areas using trash evaluation results.	Ongoing	ESD
	1. Coyote Watershed	Done FY 04-05	ESD
	2. Remaining San José locations	**Done** FY 05-06	ESD

TRA 6 – Identify and Implement Trash Management Practices

#	Activities	Target Date	Responsible Party
A.	Identify reasonable trash management practices to address high priority areas (in TRA 5B).	Ongoing	ESD, PRNS, GS, DOT
B.	Implement or refine trash management practices at high priority areas to the maximum extent practicable.	Ongoing	ESD, PRNS, GS, DOT
C.	Document and ~~report~~ **evaluate** implementation of trash management actions.	Ongoing	ESD
D.	Provide Program with information on assessments and trash management practices implemented using standardized reporting format.	Annually	ESD
E.	Provide Program with trash assessment data forms.	Annually	ESD

#	Activities	Target Date	Responsible Party
F.	**Assist Program in developing Trash Fact Sheets.**	**TBD by Program**	**ESD**

TRA 7 – Review and Update Performance Standards and Develop Long-Term Strategy for Trash Management

#	Activities	Target Date	Responsible Party
A.	Assist with the review and update of existing standards that address BMPs or control measures relevant to trash management.	TBD by Program	ESD
B.	Assist Program staff in developing **and implementing** an effective long-term strategy for trash conditions in urban streams and waterways.	~~Done FY 05-06~~ Ongoing	ESD

TRA 8 – Implement a Pilot Demonstration Project

#	Activities	Target Date	Responsible Party
A.	Assist Program in implementing a pilot project to address trash conveyed through the storm drain system.	~~FY 06-07~~ **Ongoing as necessary**	ESD, DOT, PW
B.	Begin piloting the use of structural controls to prevent trash from entering the storm sewer system.	~~FY 06-07~~ **Ongoing as necessary**	ESD, DOT, PW
C.	Pursue grant funding to support installation of structural controls for trash management.	~~Done FY 05-06~~ **As Needed**	ESD, DOT, PW
D.	**Evaluate the effectiveness of the pilot structural controls.**	**Ongoing as necessary**	**Program, ESD, DOT, PW**

Monitoring

MON Work Plan

Monitoring activities required in the stormwater permit are generally implemented in collaboration with other agencies. The City continues to participate in monitoring activities area-wide, including Regional and Program-focused investigation of pollutants and sources of pollutants to the storm drain system. The City also provides input and support to the Program's multi-year monitoring program, and reviews work products as various Program-level projects are designed and completed.

The City, in conjunction with the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) has submitted, to the Water Board, a Multi-Year Receiving Waters Monitoring Plan required per permit provision C.7.b. The final version of the plan was submitted August 5, 2002 and revised March 1, 2004. The Multi-Year Plan covers a number of pollutant control programs required by C.7 and C.9 provisions of the permit. The City continues to support Program staff in the implementation of the plan by commenting on annual plans, providing guidance for sampling within the City, and participating in the Watershed Analysis Ad Hoc Task Group.

The 2001 C.9 permit provisions require implementation of control programs for Copper, Nickel, Mercury, Pesticides, PCBs, and Dioxin-like compounds. The City continues to support and assist the Program efforts to address these control and monitoring efforts. Additionally, the City is actively involved as stakeholder and workgroup member for the Guadalupe Mercury TMDL effort, and will continue to contribute and comment on products and reports generated by Baywide TMDLs for copper, nickel, mercury and PCBs. City Staff also actively participate in Clean Estuary Project activities through the PCB workgroup and Diazinon and Pesticide Related Toxicity workgroup.

ESD Biologist collecting field data from Coyote Creek

PCB Control Program

Analytical characterization work to support the PCB Control Program, required under provision C.9.e, has been completed. The Program is currently working on next steps with BASMAA and CEP.

Initial PCB analysis was performed on sediments found in selected urban storm drain systems. At this point, no known controllable sources of PCBs have been identified. Results of the follow-up analytical work have been reviewed and further sampling work to identify controllable

sources was undertaken in October and November of 2002. The SCVURPPP Program submitted the final PCB Control Plan March 1, 2002, and the Control Program Work Plan July 1, 2002. In addition, the City continues to implement activities described in "Next Steps" from the Year Two PCB Case Study Report submitted to the Water Board in July 2003.

#	Activities	Compliance Date	Responsible Party
A.	Sample, analyze, and report on PCBs in storm drain sediments to characterize potential sources and implement controls.	Done, 6/00 through FY 01-02	Program, ESD
B.	Begin implementation of final PCB Control Plan upon approval.	Done FY 02-03 & Ongoing	ESD

Dioxin-like Compound Control Program

Characterization of dioxins based on existing data has begun Program-wide. The Program is now collaborating with BASMAA and CEP to develop a conceptual model/impairment assessment document. City Staff provide comments to the Program and directly to CEP in support of this process.

This Dioxin-like Compound Control Program will develop procedures to identify, assess, and manage controllable sources of Dioxin-like compounds found in urban runoff.

#	Activities	Compliance Date	Responsible Party
A.	Characterize distribution of Dioxin-like compounds in the urban runoff system based on existing data.	Done FY 01-02	Program
B.	Begin implementation of SCVURPPP plan to characterize distribution of Dioxins.	In Progress at Program Level	Program
C.	Submit plan that identifies control measures / management practices to eliminate or reduce discharges of Dioxins, if needed.	TBD	Program
D.	**Explore, and implement if feasible, efforts to move toward alternative fuels for diesel vehicles in City fleet.**	**FY 06-07 Ongoing**	**ESD, DOT, GS**

Sediment Control Program

The City's sediment control program falls predominantly within the Construction Inspection (CON) section of this work plan. Sediment monitoring activities also continue in conjunction with the SCVURPPP Multi-Year Receiving Waters Monitoring Plan.

Pilot Monitoring Programs

In addition to the above listed control programs, the City concluded activities performed in support for the two Monitoring Pilot Programs that were begun in 1997. These pilot programs generated data that helped develop the follow-on programs of IND (outreach to industrial and commercial dischargers) and the SCVURPPP Multi-Year Receiving Waters Monitoring Plan.

MON 1 – Industrial Stormwater Monitoring Pilot Program

This program sampled key industrial sites to determine the significance of metal-contaminated stormwater discharges associated with industrial activities. The ultimate objective from this project of educating industrial and commercial dischargers about developing and implementing SWPPPs and BMPs has now been turned over to the Industrial and Commercial Dischargers section of this work plan under IND.

#	Activities	Compliance Date	Responsible Party
A.	Design and execute a sampling program to meet the project objectives, analyze results, develop guidance for industry to improve SWPPP implementation, and provide technology transfer information to industry and inspectors.	Done, FY 96-97 through 01-02 Ongoing as part of IND	ESD

MON 3 – First Flush Monitoring Program

First flush discharge areas along The Coyote Creek and Guadalupe River were monitored for three wet seasons. The City provided data to the Program for analysis and comparison to other data in June of 2002. The Program submitted a final report to the Water Board in 2003; it was included as appendix C-2 in the Program's 02-03 Annual Report.

#	Activities	Compliance Date	Responsible Party
A.	Conduct multi-year First Flush study sampling, analyze data and provide data to Program as part of Multi-year Monitoring Program.	Done, FY 96-97 through 02-03	ESD, Program

Municipal Compliance

Fuelling island at Mabury Corporation Yard

This program element summarizes the City's efforts to train City staff on pollution prevention practices and to ensure that City facilities comply with stormwater requirements. Municipal training continues to be a key element for most program elements. Specific program elements that include municipal training activities include ICID 3, IND 5, NRD 11, CON 6, CON 8, PSR 2, PSR 3, PSR 6, SDO 3, SDO 4, PM 4, and WUO&M 3. In order to ensure that City facilities comply with stormwater requirements, Corporation Yards are routinely inspected by ESD staff and the results and improvements discussed with Yard staff. Additionally, Stormwater Pollution Prevention Plans (SWPPPs) that govern the operation of Corporation Yards are also used to ensure that Yards are using current stormwater BMPs. For a list of planned training activities, see Attachment B: Municipal Training Schedule.

Municipal Training

Municipal Training is a critical function of the City's NPDES Permit. Municipal compliance is dependent on the level and quality of the training provided.

#	Activities	Compliance Date	Responsible Party
A.	Identify training needs.	Annually	ESD-UR
	1. Conduct training for City staff and City contractors that perform surface cleaning at City facilities.	**FY 06-07 Annually**	**DOT, GS, ESD**
B.	Develop curricula.	As Needed	ESD-UR
C.	Conduct training.	Ongoing	ESD-UR
D.	Evaluate municipal training program and make improvements as needed.	Annually	ESD-UR

Municipal Facilities Assessment and Compliance

Municipal facilities are required to comply with stormwater regulations. Efforts to reduce contaminated discharges from City facilities must be similar to those required of private businesses. While many elements for permit compliance are in place, the City requires a systematic approach to City facilities compliance at the level of effort required in the URMP.

#	Activities	Compliance Date	Responsible Party
A.	Conduct Corp Yard assessments and inspections.	Annually	ESD-UR, GS, DOT

#	Activities	Compliance Date	Responsible Party
	1. Conduct Citywide meeting to discuss Hazardous Material, Safety, and Stormwater issues for City corporation yards (up to two times per year).	Annually	GS, ESD, DOT, Fire, Police
	2. Revise Corporation Yard inspection form.	Done FY 05-06 As Needed	ESD-UR
B.	Review Municipal Facilities SWPPPs.	Annually	ESD-UR, GS, DOT
	1. Fully revise the five (5) remaining Corporation Yard SWPPPs (using the Main Yard revised SWPPP pilot process as a template).	6/30/07	ESD-UR, GS, DOT
C.	Conduct SWPPP training at City corporation yards.	Annually	ESD-UR, GS, DOT

Public Information / Participation

PIP Work Plan

This program is implemented in accordance with provision C.4 and includes general outreach, targeted outreach, educational programs, and public participation activities. The City has a robust and broad-based public information and public participation program, utilizing many different outreach methods to best deliver stormwater pollution prevention and watershed protection messages. Conducting outreach to the community and providing opportunities for participation in water quality protection activities are critical to evoking the behavior changes needed to manage stormwater quality. They are also important for garnering the support needed to continue and expand services and programs. Examples of outreach activities include: stenciling of storm drain inlets throughout the City, training sessions for staff and developers about stormwater runoff construction requirements, and conducting Wacky Watershed teacher training workshops.

Watershed Protection Engineer educating 3rd graders at the Water Wizards Festival

Outreach in Other Elements

Other sections of this work plan contain elements related to outreach to specific target audiences. They can be found in ICID 4, IND 6, NRD 2, CON 7, PM 6, M 5, CB-1**,** CB-3, and CB-12. For a list of planned outreach activities, see Attachment A: Outreach Activities Summary.

PIP 1 – General Outreach

The City of San José will promote general citizen awareness of what a watershed is, the functions of the storm drain system, pathways and sources of urban runoff pollution to the South Bay watershed, and behaviors that adversely affect water quality.

#	Activities	Compliance Date	Responsible Party
A.	Participate in WMI Outreach, and coordinate WMI outreach with Watershed Watch and Program efforts.	Ongoing	ESD, WMI, Program
	1. Participate in Watershed Watch campaign.	Ongoing	ESD, Program
B.	Identify, support and participate in appropriate community events to further general public awareness.	Ongoing	ESD
	2. Work with Watershed Watch Events work group.	Ongoing	ESD, Program
C.	Give presentations upon request that focus on stormwater messages to elementary through college grade levels, neighborhood groups, etc.	As Needed	ESD

PIP 2 – Targeted Outreach

The City of San José will develop and implement targeted residential outreach and education campaigns, based on high priority pollutants, to effectively reduce pollutant-causing behaviors and promote Best Management Practices.

#	Activities	Compliance Date	Responsible Party
A.	Identify general residential practices contributing to stormwater pollution. Identify reasonable alternatives to pollutant causing behavior.		ESD, Program
	1. Review surveys and applicable reports.	Ongoing	ESD
	2. Meet with inspectors to discuss and document residential outreach needs.	Ongoing	ESD
	3. Prepare report identifying residential outreach needs and tasks and conduct outreach as necessary.	Annually	ESD
B.	Identify ICID practices and target audience(s) contributing to pollution.		ESD
	1. Review ICID reports.	Ongoing	ESD
	2. Meet with ICID inspectors to discuss and document outreach needs.	Ongoing	ESD
	3. Prepare report identifying ICID outreach needs and tasks and conduct outreach as necessary.	Annually	ESD
C.	Promote selected residential and ICID messages through local and regional activity (e.g. Program PIP, BASMAA PIP, BAPPG, Media Relations, etc.)**.**		
	1. Report on targeted residential and ICID outreach activity.	Annually	ESD
	2. Participate in the Program's Pesticide and Mercury ad hoc task groups.	Ongoing	ESD, Program

PIP 3 – Educational Programs

The City of San José will support and/or develop and implement educational programs designed to increase youth understanding and appreciation of the South Bay watershed.

#	Activities	Compliance Date	Responsible Party
A.	Support, and/or develop and implement school and youth education programs.		
	1. Participate in WE&O Schools and Youth work group.	Ongoing	ESD, Program
	2. Participate in the Alviso Education Center work group.	Ongoing	ESD, Program
	3. Participate in City Education programs such as the Youth Watershed Education Team, Rangers in Schools, **Go Green Initiative**, etc.	Ongoing	ESD

PIP 4 – Citizen Participation

The City of San José will support and/or develop and implement citizen involvement programs designed to increase citizen understanding and appreciation of the South Bay watershed.

#	Activities	Compliance Date	Responsible Party
A.	Support and/or develop involvement opportunities for San José residents**.**		
	1. Participate in creek clean-ups on a biannual basis through in-kind staff support for the Creek Connections Action Group.		
	a. Fall creek cleanup (Coastal Cleanup Day)**.**	Annually~~, Q1~~	ESD, PRNS
	b. Spring creek cleanup (National Rivers Day)**.**	Annually~~, Q4~~	ESD, PRNS

PIP 5 – Outreach Evaluation

The City of San José will evaluate its Outreach efforts for effectiveness.

#	Activities	Compliance Date	Responsible Party
A.	Implement selected evaluation tools.		ESD
	1. Work with Program, WMI, and Watershed Watch AHTG to Plan for Program's Watershed Watch Campaign Survey.	As Needed	ESD, Program
	2. Report on survey and evaluation activity during the report period.	Annually	ESD
B.	Annually review, modify and report on outreach plans based on effectiveness results.		ESD
	1. Document in Annual Report effectiveness of outreach activities conducted in prior fiscal year.	Annually	ESD

Permit Reapplication

ESD staff evaluating draft Municipal Regional Permit.

The City's current NPDES permit was adopted in February 2001 for a five-year period. The permit was amended in October 2001 and July 2005, with both amendments relating to the New and Redevelopment stormwater treatment and hydromodification provision, also known as Provision C.3. The permit has been administratively extended since February 2006, pending the adoption of the Bay Area-wide Municipal Regional Permit.

In late 2005, the Water Board embarked on a multi-stakeholder process to craft an NPDES permit, called the Municipal Regional Permit (MRP) that would apply to all municipal stormwater dischargers in the Bay Area and be in effect for a five year period. The Water Board is expected to adopt the MRP during the 07-08 fiscal year. The adoption of the MRP would necessitate the development of a new City work plan which will identify activities with associated timelines that are required in order to achieve compliance with the stormwater requirements set forth in the MRP.

Permit Reapplication Preparation

#	Activities	Target Date	Responsible Party
A.	Compile all changes to URMP as part of reapplication for next permit. (C.2.b)	Done FY 04-05	ESD
B.	Participate in permit development and negotiation processes.	Ongoing	ESD
C.	**As required, develop new five-year work plan that starts the following fiscal year upon adoption of MRP.**	**FY 07-08**	**ESD**

Attachment A: Outreach Activities Summary

#	Activity	Outreach Type	Work Plan Reference	Implementation Date	Evaluation Mechanism
	❍ = General Outreach, ◎ = Targeted Outreach, ✋ = Citizen Involvement, ✎ = Education				
1.	**Storm Drain Stenciling Evaluation** Evaluate current methods of inlet marking and make recommendations for future FY efforts.	❍		FY 07-08	
2.	**Requests for Brochures** Distribute outreach materials upon request.	❍	PIP 1.C	FY 07-08	♦ Materials distributed
3.	**Regional partnerships** Participate in BAPPG, BASMAA/BACWA Media Relations campaign, CEP, etc.	❍	PIP 2.C	FY 07-08	
4.	**Event Support** As needed, staff Booth and/or provide outreach materials to select events. Evaluate the overall benefit and effectiveness of attending events and make changes as needed.	❍	PIP 1.B	As needed	♦ Materials distributed
5.	**BMP Reprints** Reprint selected Outreach materials as needed.	❍	PIP 1	FY 07-08	♦ n/a
6.	**Industrial Users Academy** Give stormwater, pollution prevention and GIASP compliance information to industries permitted to the Water Pollution Control Plant.	◎: Plant-permitted Industries	IND 6.A, PIP 2.B, PM 6.A, M 5.B	FY 07-08	♦ Participant surveys
7.	**Outreach to Development Community** PW & ESD staffs to conduct training on erosion and sediment control for private developers of type 2 projects. PBCE Planning and PW also conduct roundtable meetings with developers where information regarding stormwater requirements is shared.	◎: Developers	CON 7 NRD 2	FY 07-08	♦ Participant surveys
8.	**IPM Store Partnership** (PROGRAM) Create & provide fact sheets & materials to pesticide retailers to facilitate point-of-purchase outreach to support IPM Store Partnership Program. There are currently nine stores in San José participating in the IPM store partnership.	◎	PM 6.D.	FY 07-08 dates TBD	
9.	**Partner with other City programs, such as the Strong Neighborhoods Initiative** Continue partnering with City's SNI for delivering selected messages. Other programs to investigate partnerships are the Anti-Litter Program, After School Program, etc.	◎	PIP 1	FY 07-08	
10.	**Mercury Outreach** Investigate opportunities to include mercury messages through participation in the Home Show	◎	M 5 PIP 2.C.	FY 07-08	

#	Activity	Outreach Type	Work Plan Reference	Implementation Date	Evaluation Mechanism
	❍ = General Outreach, ◎ = Targeted Outreach, ✋ = Citizen Involvement, ✎ = Education				
	events, residential newsletters or other mailings, and support the County's Universal Waste Take-back Pilot Program.				
11.	**IPM Outreach** Prepare IPM stories and press releases for local media. Investigate opportunities to include IPM messages in the City's outreach to businesses.	◎	PM 6.A PM 6.B	FY 07-08	
12.	**Facility/Building Manager Outreach** Distribute e-mail newsletter to General Services Building/Facilities Managers with information on selected messages.	◎	PM 6.A M 1.A	FY 07-08	
13.	**Coastal Clean-up Day** Creek Clean-up event coordinated with Countywide effort.	✋	PIP 4.A	Fall 07	♦ Participant surveys ♦ Amount picked up
14.	**National Rivers Clean-up Day** Creek Clean-up event coordinated with Countywide effort.	✋	PIP 4.A	Spring 08	♦ Participant surveys ♦ Amount picked up
15.	**Wacky Watersheds Workshops** Present South Bay Water Connections curriculum to middle school educators within San Jose/Santa Clara Water Pollution Control Plant service area.	✎	PIP 3.A	FY 07-08	♦ Participant surveys ♦ Follow-up call of attendees
16.	**Water Awareness Program** Also called Rangers in Schools. Presentations focusing on Pollution Prevention. *It's Wet It's Wild It's Water!* Curriculum distributed to teachers.	✎	PIP 3.A	FY 07-08	♦ Survey of teachers ♦ Survey of students
17.	**Slow the Flow** Grant to Don Edwards Alviso Environmental Education Center to host 9 different types of events: special events, interpretive programs, teacher orientation, field trips, in-class presentations, outreach presentations, workshops, special visits and interpretive displays.	✎	PIP 3.A	FY 07-08	♦ Done by Grantee
18.	**Youth Watershed Education Grants** Grant program for educators.	✎	PIP 3.A	FY 07-08	♦ Audit of projects
19.	**Website** Maintain and update website with pertinent information as needed.	❍	PIP 1	FY 07-08	♦ Website traffic data
20.	**ICID Targeted Outreach** Targeted outreach to areas that exhibited a high number of residential ICID Complaints in FY 06-07.	◎	PIP 2.C	FY 07-08	♦ TBD
21.	**Charity Car Wash Kit** Explore the option of providing targeted outreach and supplies to community groups engaging in fundraising car wash events.	◎		FY 07-08	♦ TBD

Attachment B: Municipal Training Schedule

PS ID #	Topic	Sponsored or Held By	Dept/Division/Section Attending	# Sessions	Tentative Schedule
ICID 3	Construction Inspection Training	ESD - WE	ESD - WE	1	07/07
ICID 3	Annual Training for ICID Inspectors	ESD - WE	ESD - WE	1	07/07
IND 5	Training for IND Inspectors	ESD - WE	ESD - WE	1	07/07
CON 6	Wet Weather Construction Site Preparation & Inspection	DPW, ESD	PW	2	9/07
CON 6	Construction Site Planning and Management For Water Quality Protection	SCVURPPP & Water Board	PW, ESD, PBCE, PRNS		9/07
CON 6	SOPs for inspections during wet and dry season to include procedures for erosion control plan review inspection process	DPW, ESD	PW Inspections, PBCE Building Inspectors (All to attend at least once every two years)		10/07
CON 7	Erosion & Sediment Control Training for Type 2 Private Development Projects	DPW & ESD	Private Developers, PW, ESD		10/07
CON 8	Erosion Control Information To Be Included In Contract Language For Capital Improvement Projects Training For PW Construction Project Management	PW & ESD	PW		11/07
NRD 10	NPDES C.3 Training	Various	PBCE, PW, RDA, ESD		
PSR 2	DOT Contract Manager Training	DOT, ESD	DOT Managers from: Transportation, Planning, Traffic Signals, Traffic Ops, Sanitary & Sewers	2	03/08
PSR 3	Stormwater Pollution Prevention Training	DOT, ESD	DOT Crews	12	05/08
PSR 6C	Stormwater Pollution Prevention Training – Rural Public Works	PRNS, ESD	PRNS	2	10/07
SDO 3A	DOT Contract Manager Training	DOT, ESD	DOT Managers from: Transportation, Planning, Traffic Signals, Traffic Ops, Sanitary & Sewers	2	03/08
SDO 4	Stormwater Pollution Prevention Training	DOT, ESD	DOT Crews	12	05/08
PM 4A	Worker Safety training per DPR requirements	GS, DOT, PRNS, ESD	GS, DOT, PRNS, ESD	1	2/08
PM 4B	Training on IPM Policy & Techniques	GS, DOT, PRNS, ESD	GS, DOT, PRNS, ESD	1	2/08
WUOM 3	Water Utility Operation & Maintenance Discharge Training	ESD (Muni Water)	Muni Water Operations & Maintenance Crews		12/07

Glossary

AHTG	Ad Hoc Task Group
AOC	Area of Concern
BACWA	Bay Area Clean Water Agencies
BAPPG	Bay Area Pollution Prevention Group
BASMAA	Bay Area Stormwater Management Agencies Association
BMP	Best Management Practices
CAO	City Attorney's Office
CEP	Clean Estuary Partnership
COS	Communications and Outreach Subgroup of WMI
DOT	Department of Transportation
EEC	Environmental Education Center
EIR	Environmental Impact Report
ESD	Environmental Services Department
ESD-P&P	Policy and Planning
ESD-MarComm	Marketing & Communication Section
ESD-Muni	City of San José Municipal Water System
ESD-R&R	Regulations and Research Section
ESD-UR	Urban Runoff Section
ESD-WE	Watershed Enforcement Section
GIASP	General Industrial Activities Storm Water Permit
GS	General Services Department
HHW	Household Hazardous Waste
HMP	Hydromodification Management Plan
IPM	Integrated Pest Management
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
PBCE	Department of Planning, Building and Code Enforcement
PBCE-Bldg	Building Division of PBCE
PBCE-Planning	Planning Division of PBCE
PD	Police Department
POTW	Publicly Owned Treatment Works
PRNS	Department of Parks, Recreation and Neighborhood Services
PW	Public Works Department
PW-CFAS	City Facilities Architectural Services Division of PW
PW-ECS	Engineering and Construction Services Division of PW
PW-TDS	Transportation & Development Services of PW
RDA	Redevelopment Agency
RWQCB or Water Board	Regional Water Quality Control Board
SCVURPPP or Program	Santa Clara Valley Urban Runoff Pollution Prevention Program
SNI	Strong Neighborhoods Initiative
SOP	Standard Operating Procedure

SWPPP	Storm Water Pollution Prevention Plan
TBD	To Be Determined
TMDL	Total Maximum Daily Load
URMP	Urban Runoff Management Plan
WE&O, or WEO	Watershed Education and Outreach
WMI	Watershed Management Initiative
WUPPP	Water Utility Pollution Prevention Program
YWET	Youth Watershed Education Team