



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: John Stufflebean

SUBJECT: SEE BELOW

DATE: 08-23-06

Approved

Ray Winer

Date:

8/28/06

COUNCIL DISTRICT: City-Wide

SUBJECT: URBAN RUNOFF MANAGEMENT PLAN ANNUAL REPORT 2005-2006

RECOMMENDATION

Approval to submit the 2005-2006 Urban Runoff Management Plan Annual Report and certification to the Regional Water Quality Control Board in conformance with the City's Municipal Separate Storm Sewer System National Pollutant Discharge Elimination System permit requirements, pursuant to the Federal Clean Water Act.

OUTCOME

Approval of this recommendation will result in submittal of the FY 2005-2006 Annual Report to the Regional Water Quality Control Board, as required by permit.

BACKGROUND

The Federal Clean Water Act requires the City to have a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of stormwater to surface waters via the City's storm sewer collection system (Stormwater Permit). San José is included in the stormwater permit issued to the Santa Clara Valley Urban Runoff Pollution Prevention Program (Program), which involves 15 agencies in Santa Clara County whose land area drains to South San Francisco Bay. The City's co-permittees are 12 other municipalities, the County of Santa Clara, and the Santa Clara Valley Water District. The Regional Water Quality Control Board (Water Board) last renewed the permit in February 2001 with subsequent amendments issued in October 2001 and July 2005.

The City's current NPDES permit has been administratively extended since February 2006, pending the adoption of the Bay Area-wide Municipal Regional Permit (MRP). San José staff has participated, and will continue to participate, in the MRP process through the Program, Bay Area Stormwater Management Agencies Association, and individually as a City. Reporting

requirements are expected to increase for various stormwater program elements with the new MRP. The Water Board is expected to adopt the MRP in 2007.

The current Stormwater Permit mandates that the City submit an Annual Report by September 15th of each year, documenting the performance of permit-related tasks and evaluating the effectiveness of the activities. This most recent Annual Report fulfills the requirement for reporting on activities undertaken from July 1, 2005 through June 30, 2006.

ANALYSIS

The Annual Report covers a variety of urban runoff program elements designed to reduce pollutants in stormwater discharges. Programs include industrial inspections, new development plan review, street and storm sewer maintenance, construction site inspections, monitoring, public education and outreach, and other strategies to reduce specific pollutants.

In addition to a brief overview of the activities conducted, the Annual Report cites both accomplishments and opportunities for improvement for each program element during the fiscal year. Among the highlights for FY 2005-2006 are:

- Adoption of new Council Policy 8-14 entitled “Post-Construction Hydromodification Management;”
- Completion of more than 3,500 inspections of industrial and commercial facilities;
- Continued coordinated efforts between Public Works Development Services staff, Environmental Services - Watershed Enforcement Inspectors, and Planning, Building and Code Enforcement - Building Inspectors to oversee plan development and inspections of construction sites in the City;
- Continued implementation of trash assessments and a Memorandum Of Agreement with the Santa Clara Valley Water District to coordinate trash management activities;
- Commitment to continuous improvement regarding the implementation of stormwater treatment and hydromodification control measures;
- Commitment to improved targeted outreach and education to SNI neighborhoods with a history of illegal discharge incidents; and,
- Expansive training to ensure that standard operating procedures (SOPs) and best management practices (BMPs) to prevent stormwater and creek pollution are incorporated into all aspects of City operations.

See Attachment A for the Executive Summary, which provides greater detail. The complete *Urban Runoff Management Plan Annual Report 2005-2006* is available on the City website at <http://www.san.Joséca.gov/clerk/agenda.asp>¹.

POLICY ALTERNATIVES

Not Applicable.

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 Annual Report does not meet any of the above criteria, outreach is an integral part of the Urban Runoff program. The Management Plan includes components to conduct outreach to various sectors of the community on relevant stormwater issues, e.g. pesticide use, mercury, new development requirements, and ensuring that only rainwater enters the storm sewer system. Many outreach activities are accomplished in partnership with the Program or regional campaigns. Although no additional outreach was conducted specifically for this recommendation, individual items associated with the Annual Report underwent appropriate outreach as part of their implementation. For example, the update of City Council policy and incorporation of stormwater controls in new development followed City Council Policy 6-30: Public Outreach for Pending Land Use and Development Proposals.

COORDINATION

The Annual Report was developed by the Environmental Services Department in collaboration with the departments of Planning, Building and Code Enforcement; Public Works; Transportation; Parks, Recreation and Neighborhood Services; and General Services as well as

¹ All documents referenced as web links are also available for review in the City Clerk's Office or the Environmental Services Department. To find a report at the website, select the Council date and item number.

the Redevelopment Agency and the City Attorney's Office.

FISCAL/POLICY ALIGNMENT

This submittal is consistent with the Fiscal Year 2005-2006 Urban Runoff Management Plan Work Plan, approved by Council in February 2005, to support activities that comply with the City's Stormwater NPDES Permit.

COST SUMMARY/IMPLICATIONS

There are no direct costs associated with submittal of the Annual Report, as the report summarizes activities that have already occurred. Ongoing programs related to the stormwater permit are funded primarily through the Storm Sewer Operating Fund (Fund 446).

BUDGET REFERENCE

Fund #	Appn #	Appn Name	RC #	Total Appn.	Amt for Contract	2005-2006 Adopted Operating Budget*	Last Budget Action (Date, Ord.No.)
446	0762	Non-Personal/Equipment	700730	1,874,952	N/A	VIII-48	N/A

* Adopted by the City Council on June 28, 2005.

CEQA

Not a project.


John Stufflebean
Director, Environmental Services Department

For question please contact Melody Tovar, Acting Deputy Director, Environmental Services Department, at 408-945-3000.

Attachment

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City of San José Urban Runoff Management Plan
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Executive Summary

The City is required to submit to the Regional Water Quality Control Board (Water Board) an Annual Report that documents the progress of the Urban Runoff Management Plan for the previous fiscal year. The Annual Report is prepared pursuant to provision C.6 of the City's National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge to the City's storm sewer system.

The Report includes sections for each of the program elements included in the Urban Runoff Management Plan as required in the permit. Each section is comprised of an update on the status of the work plan, an evaluation of various performance elements, responses to Water Board feedback received during the past year, and additional tables or information to demonstrate performance for a program element. Summaries are also provided for the array of outreach activities and municipal training sessions that are included in various program elements.

Most program elements contain requirements that affect more than one City department. The strategy for attaining compliance focuses on three different types of activities that the City conducts:

- 1) Enforcement and monitoring to detect and respond to incidents of illegal discharge to the storm sewer system;
- 2) Structural and business process changes to City operations and services; and
- 3) Education for municipal employees as well as the community at large.

The City also contributes to activities undertaken by the Santa Clara Valley Urban Runoff Pollution Prevention Program (Program) and the Bay Area Stormwater Management Agencies Association (BASMAA); however, this report includes only activities performed by the City. An overview of the year for each program element follows.

Illicit Connection / Illegal Discharge Inspection (ICID)

The City's Environmental Services Department (ESD) responds to complaints regarding illegal discharges or threats of discharge to the storm sewer system. This year, the City responded to more than 792 cases, a slight decrease from last year but well within the five-year average case rate. Residential incidents continue to be most frequent, with vehicle-related sources being most common. Dumping of various materials was also a prevailing source of incidents. ESD responds to all complaints with education and enforcement in partnership to achieve compliance and prevent future incidents. Staff intends to do targeted outreach to four Strong Neighborhood Initiative (SNI) areas that exhibited a high number of residential complaints in FY 06-07 in an effort to educate the residents and reduce the number of complaints.



Storm drain inlet stenciled with hotline number and local creek name

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The City continues to conduct targeted outreach in an effort to reduce the number of ICID calls. In FY 05-06 City staff met with the San Pedro Square Business Association, assisting with the planning and implementation of procedures to stop discharges to the storm drain from surface cleaning and leaking trash compactors.

Industrial & Commercial Discharges (IND)

Under this program element, ESD inspects more than 3,500 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. 72% 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.

FY 05-06 marked the third time in three years that the City experienced a significant spike in the number of business license applications. The total inventory of facilities in the City that are subject to inspection has doubled over the last three years, representing a significant workload challenge. The City began to integrate this increased workload for the short term by prioritizing and phasing initial inspections and shifting resources. Since this increase in workload is expected to continue in subsequent fiscal years, long-term strategies will be explored to fulfill inspection requirements.

FY 05-06 marked the fourth year of implementation of the comprehensive restaurant inspection program and 1,148 facilities were inspected. Staff also conducted a review of the last three years of data in order to assess how the program is working. Based on the data assessment, the City is establishing a Fats, Oils, and Grease (FOG) Inspection Program. This Program will target food



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

service facilities and focus specifically on successfully integrating the sanitary sewer management plan (SSMP) requirements and enhancing the business' general awareness of stormwater issues related to food service facilities.

Education remains the primary tool for preventing or stopping practices that may pollute stormwater. In FY 05-06, inspectors distributed almost 9,000 Best Management Practices (BMPs) brochures, fact sheets, posters, and other materials as part of the IND program. Generally, inspectors are being very proactive and distributing BMPs to support educational efforts. For example, businesses that did not have any current

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stormwater issues were still given BMPs by inspectors to assist the business in their efforts to keep pollution out of the storm drain system.

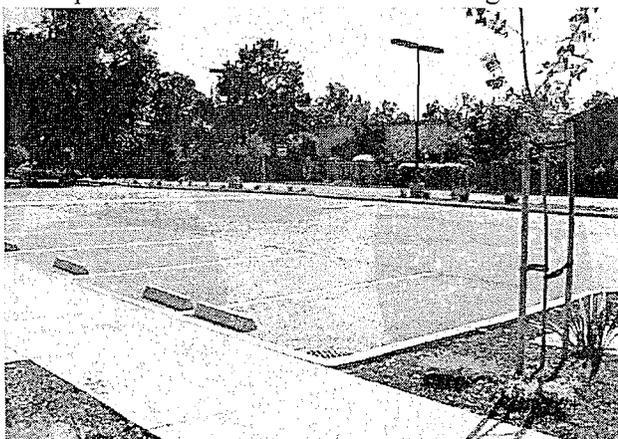
New and Redevelopment (NRD)

This program element is driven by the New and Redevelopment provision (also referred to as C.3) of the permit, as amended in October 2001 and again most recently in July 2005. This provision requires that development projects implement controls to address pollutant discharges and increased storm flows for the life of a project. The implementation of the new hydromodification management plan (HMP) requirements began on October 18, 2005.

The City continues to make significant strides implementing this challenging program. The City adopted the Post-Construction Hydromodification Management Policy 8-14 (Policy 8-14) on October 18, 2005. The policy requires the management of development-related increases in peak runoff flow, runoff volume and duration (“hydromodification”), where such hydromodification is likely to cause increased erosion, silt pollutant generation or other impacts to beneficial uses of local rivers, streams and creeks. Techniques for managing hydromodification include detention basins and other landscape measures that infiltrate or hold stormwater flows for controlled release. Policy 8-14 supplements stormwater treatment requirements delineated in Policy 6-29 entitled “Post-Construction Urban Runoff Management.”

The City also implemented an expansive training program for both treatment controls and hydromodification to give staff the information and resources needed to effectively guide and review development applications and to design public projects. Among the HMP training highlights were a Green Roof Symposium that focused on green roofs as a stormwater and hydromodification control measure appropriate for small urban infill sites. Additionally City staff from five departments attended both the SCVURPPP and StormCon HMP workshops. Plus, City staff also attended a beta testing demonstration of the Bay Area Hydrology Model (BAHM) software that will greatly simplify the modeling calculations required to comply with the HMP.

The City conducted a pilot inspection program in FY 05-06, and based on those results, revised its Operation and Maintenance Program. The revised program requires inspection of all stormwater treatment and hydromodification measures installed during the first year of operation. Subsequent inspections are based on observed stormwater issues such as improper installation and lack of functionality. This revised program is based on the City’s successful IND inspection program.



Porous-paved parking lot: a structural stormwater control

The City continues to find that implementation of stormwater and hydromodification controls are easier for undeveloped, “greenfield” sites, such as Coyote Valley (in southern San José) because

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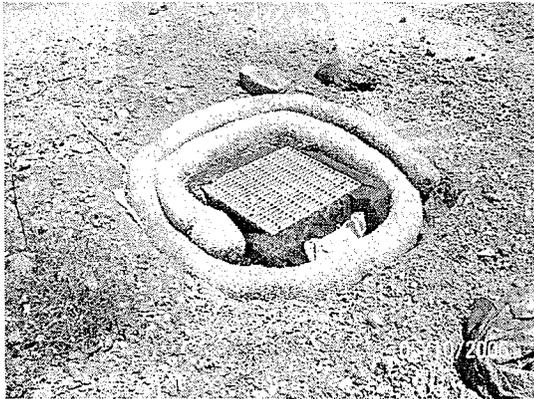
the land requirements for runoff treatment and hydromodification measures can be factored into the master plan and accommodated early in the development process. Implementing stormwater treatment and hydromodification controls on smaller, infill sites in a developed urban area is much more difficult given limited land area, the high cost of land, and the City's policies that discourage sprawl and encourage increased densities. These policies have an associated water quality benefit as they reduce traffic congestion and the associated air pollution.

The City continues to emphasize site design and source control as the primary tactics for addressing stormwater on a project-by-project basis. The City has also continued to actively participate in efforts to develop analytical tools and outreach on a regional basis. City staff from a variety of departments continues to provide information about stormwater issues and new requirements to the public and the development community.

Construction Inspection (CON)

The City inspects activities at construction sites to prevent sediment and other pollutants from entering the storm sewer system. Inspectors from Public Works and Building review erosion and sediment controls as part of their routine inspections. Environmental Services supplements this effort with limited inspection and broad enforcement follow-up. These departments also collaborate in providing outreach materials and training to the development community on appropriate best management practices.

In FY 05-06, the City again focused on staff training, hosting and coordinating several training sessions for staff involved in construction inspection. Two trainings were held in October 2005 by City staff for Building and Public Works inspectors. Staff has also attended trainings held by



Proper stormdrain protection during construction prevents construction debris and sediment from entering the stormdrain.

the Santa Clara Valley Urban Runoff Pollution Prevention Program and the Water Board held in December 2005 for inspectors and construction project managers. An additional training was held in January 2006 by City staff for Public Works capital improvement project managers. These focused trainings help project managers and teams ensure erosion and sediment control measures are included on plans and specifications. Trainings have made inspectors more vigilant in identifying and correcting problems at construction sites. Environmental Services staff plans to conduct frequent, short, focused stormwater BMP trainings for all inspection groups during section meetings throughout FY 06-07 to supplement the main fall annual training.

While inspection efforts are improving, site conditions still show that vigilance is necessary to ensure stormwater issues are addressed. Overall, the need for enforcement increased with 223

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verbal warnings, 90 written notices, and 54 administrative citations issued by ESD Watershed Enforcement Inspectors.

Public Streets, Roads, & Highways (PSR)

This program element is pursuant to provision C.2.a of the permit and is one of several that address municipal activities. These program elements essentially consist of best management practices (BMPs) being incorporated 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. For FY 05-06, this training was completed in May 2006. Session content centered on review of the Department of Transportation's BMPs and Standard Operating Procedures (SOPs) for O&M activities. Corp Yard Stormwater Pollution Prevention Plan training was integrated into the DOT crew training in FY 05-06. Training content is directed by which work groups are present, and the training curriculum is revised when needed to reflect new practices. On average, 88% of the employees responded that the BMPs taught were appropriate for their work.



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

Training was also conducted for Rural Public Works BMPs in accordance with provision C.5, which requires that the City employ proper techniques when conducting maintenance activities in rural areas. This standard is integrated as part of the PSR program element. The City's departments of Parks, Recreation, and Neighborhood Services; General Services; and Transportation are responsible for managing rural public works maintenance and support activities.

The City conducts an extensive Street Sweeping program, involving the sweeping of the central business district; arterials, collectors, and bicycle lanes; and residential streets. Annually, the City sends out a calendar of the street sweeping schedule to each single-family dwelling, and asks neighborhood associations within the City to include reminders in their association newsletters for moving parked vehicles on street sweeping days. The City is continuing to expand the areas in which parking restrictions are required and enforced to improve the effectiveness of the street sweeping program. In FY 05-06, the enforcement area was broadened from 160 to 196 curb miles. The City anticipates expanding the areas in which parking restrictions are required and enforced for street sweeping by approximately 40 curb miles in FY 06-07.

Storm Drain System Operation & Maintenance (SDO)

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

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maintenance activities that are conducted to ensure the proper function of the storm sewer system to collect and convey storm runoff. Maintenance staff training was conducted to coincide with that of the PSR program element and was completed in May 2006.



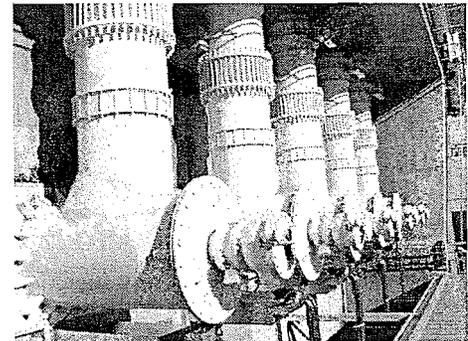
*Department of Transportation Vector crew
cleaning out a storm drain inlet*

DOT successfully implemented its annual storm drain inlet inspection and cleaning program, cleaning approximately 28,500 inlets. To date, the City has been able to achieve the more comprehensive Tier 2 level of inlet cleaning performance. Due to budget constraints anticipated for FY 06-07, a modified implementation of Tier 2 may be needed. Evaluation of the data collected during inlet cleaning indicates that approximately six percent of the City's storm drain inlets and catch basins had a problem associated with them. The key problems for stormwater protection were cars parked on catch basins; high debris (leaves, lawn clippings, dirt and other natural materials); excessive garbage (paper, bottles, cans, and other

man-made waste); and pollution (concrete, antifreeze, oil, paint, etc. that appear to have been intentionally dumped into the inlet or catch basin). Maintenance staff is directed to contact Environmental Enforcement when pollution is identified. Using this information, the City directs resources to known problem areas.

Water Utilities Operations & Maintenance (WUOM)

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. This year's hydrant-flushing program was the focus of annual evaluation of SOPs and the review found that no changes in the current practice are needed.



Pumps at the Rincon II Pump Station

An inventory of potential water utility discharges must be conducted every three years and included in the Annual Report, as required by the Water Utility Operations & Maintenance Discharge Performance Standard. This inventory is to be performed in each service zone (North San José, Evergreen, Edenvale, Coyote, and South Bay Water Recycling), by Municipal Water staff. Municipal Water staff conducted the inventory in March 2006 for all service zones. The

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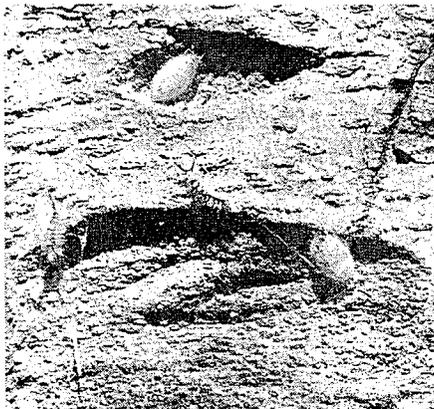
findings revealed that current SOPs and BMPs, which are successfully being implemented to reduce and eliminate pollutant discharges to receiving waters, are effective and no changes are needed.

Pesticide Management (PM)

This program element is required pursuant to provision C.9.d. of the permit. 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 has incorporated the use of IPM techniques for many years. Pesticide use on City property is based upon specific site needs. The decision to use a pesticide is determined by several factors, i.e., site evaluation, accurate identification of the pest, past history, monitoring of thresholds, review of alternative means of control, and selection of the most favorable and effective pesticide. The City also seeks to reduce the need for pesticide usage through alternate actions such as mulching, weed barriers, proper irrigation, and selection of disease resistant plants. In many instances, plant diseases and pest problems are tolerated rather than employing any pesticides. When pesticide use is necessary, the City strives to use products that are less toxic and safer for employees.

In FY 05-06, the City continued data collection and tracking of pesticide applications on City property. While improvements have been made, some data remains incomplete for Facilities and



Tussock Moth infestation on an oak tree at Williams Street Park

Special Districts. City staff will continue to work with contractors in FY 06-07 to resolve outstanding reporting and data collection issues. Comparative data was reviewed for City staff applications and golf courses. In general, City use of the two most common herbicides (Roundup and Pendulum) decreased despite an increase in total acreage managed. The use of Surflan and Gallery increased, in some cases replacing Pendulum and reducing the need for repeat applications. The use of Karmex decreased substantially in response to concerns about its impact on water quality. The pesticide Drive, containing an active ingredient deemed less toxic to the environment was tested by City staff and found to yield better results in lesser amounts than other products.

City staff continues to use ongoing and new methods to resolve municipal pest problems with less toxic and non-chemical integrated pest management techniques. PRNS continues to effectively use mulch to alleviate the need for pre-emergent herbicides and reduce water use. PRNS experienced success using biological controls such as wasps to address oak and tussock moths at test locations. The City Arborist has adopted the

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practice of offering IPM solutions to the callers regarding maintenance of street trees. Also, the arborist is encouraging the use of a disease resistant hybrid palm tree in new Public Works projects rather than the California Fan Palm, which is susceptible to pink rot and requires regular fungicide treatment. Due to its superior environmental practices, including IPM, the Los Lagos Municipal Golf Course and its superintendent were honored as the Golf Course Superintendents Association of America/Golf Digest (GCSAA) National Public and Overall winners of the 2005 GCSAA/Golf Digest Environmental Leaders in Golf Awards.

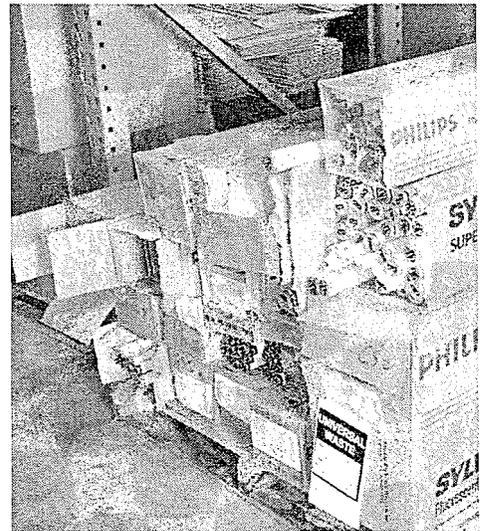
New projects to reduce reliance on chemical controls are planned for implementation in FY 06-07. The first project involves the use of predators to control rodent populations in certain parklands. The proposal involves building owl boxes and placing them strategically to entice owls to establish habitat and prey upon the rodents. The second project involves the use of a native grass seed mix to control star thistle weed along trails. Pesticides are typically used in the area proposed for a trial project. DOT-Special Districts will continue to evaluate the gopher pilot project that began in FY 04-05, which uses traps to control gophers rather than pesticides.

In FY 06-07, the City will continue taking a lead role in the planning process as co-host for the 3rd Annual Regional IPM Conference scheduled for November 2006 at the San José Convention Center. In FY 05-06, representatives from ESD, DOT, PRNS and GS began serving as conference chair and on various IPM Conference planning subcommittees.

Mercury (M)

This program element is implemented pursuant to provision C.9.c of the permit. The City has continued its efforts to reduce or eliminate mercury discharges in municipal operations. The City purchases low mercury-containing fluorescent lamps. Spent lamps are required to be recycled. In FY 05-06, the City recycled nearly 9,100 feet of mercury-containing lamps. Residential recycling of lamps is accomplished through the City's support of the Santa Clara County's Household & Small Business Hazardous Waste program.

February 2006 marked the start of the Universal Waste Rules which require common household products like batteries, thermometers, fluorescent lamps and cathode ray tubes that contain hazardous materials, such as mercury and other heavy metals, to be disposed at approved locations like the County's Household Hazardous Waste site. These products are no longer accepted in curbside trash or recycling receptacles. The City conducted various outreach efforts at both the City and Program levels to alert residents of this change including postings on the City's website and articles in the City's *Curbside Courier* newsletter.



*Fluorescent lamps for recycling at the
Central Service Yard*

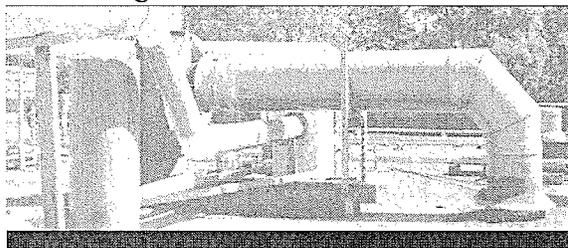
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In addition, the City has operated and maintained a National Mercury Deposition Network (MDN) site since January 2000, collecting samples, recording data, and sending both to the national MDN laboratory. The City also continues its support of the San Francisco Bay Regional Monitoring Program, AB 982 TMDL Public Advisory Group, WMI Guadalupe River Mercury TMDL Workgroup, and the Clean Estuary Partnership. The City continues its commitment to work with the Water Board and stakeholders toward TMDLs that are technically defensible and feasible for implementation.

Copper & Nickel Action Plans (CNAP)

This program element is implemented pursuant to provisions C.9.a and C.9.b of the permit, which incorporate Action Plans for copper and nickel to be implemented based on water quality monitoring results in the South Bay. The action plans include activities for which various agencies or entities assume responsibility. Only activities undertaken at the municipal level for stormwater are included in this report. Such activities have largely been integrated into other ongoing program elements but are reported as a summary for clarity. Copper and Nickel remain among the list of pollutants addressed by general and targeted outreach regarding stormwater pollution prevention.

In the City's Industrial and Commercial Inspection program, key activities have been implemented to address copper either exclusively or among the array of potential pollutants. A fact sheet regarding rooftop sources of copper pollution was again distributed to select industrial facilities. In FY 05-06, the City's Watershed Enforcement Inspectors completed a pilot project that involved inspecting rooftops of select facilities in addition to regular inspection activities. The purpose of this pilot was to evaluate the degree of BMP implementation and the need for additional outreach or enforcement efforts. Results of this project indicate that additional rooftop inspections are not necessary.



IS YOUR ROOF RUNOFF POLLUTED?

The City also continued its "NOI Filers" project. This activity aimed to increase awareness among industrial facilities of their obligations under the State's General Industrial Activities Stormwater Permit (GIASP) by providing them with BMPs and information alerting them to the requirements. Review of this information has already been successfully incorporated into routine inspections and the City reports to the Water Board a list of facilities that have not yet filed under the GIASP.

Trash (TRA)

This program element is implemented pursuant to the Program's Trash Work Plan and provision C.1 of the permit. 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

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list due to the threat of trash impairment to water quality. Activities associated with the Trash program since its inception in FY 02-03 include a survey of San José's established trash management services and programs and identification of litter hotspots.

Trash assessments based on a trash problem area list continued to be the focus of activity during FY 05-06. The trash problem area list is comprised of Anti-Litter Program sites, parks, and homeless encampments located throughout the City. This year a second round of assessments was performed at priority hotspots in the Coyote watershed and at all locations in other watersheds. Assessments were performed using standard protocol selected by the Program. The assessments provided information regarding the type and potential sources of trash found in and around urban creeks and offered insight into the effectiveness of existing trash management practices. The trash assessments revealed that existing trash management activities are sufficient at many locations, but that enhancements are needed in others.



Volunteers removing trash from Coyote Creek behind San José High Academy

The City continues to try to maximize existing resources to address trash problem areas throughout the City. This year Watershed Enforcement acted as a resource to help address trash problems on privately owned property adjacent to creeks. Enforcement inspectors contact property owners to ensure clean up and/or prevent trash from re-accumulating. In addition, the City established an agreement with the San José Conservation Corps to provide clean-up services along creeks to supplement existing clean-up provided by City maintenance. The Conservation Corps removed approximately 70 cubic yards (approximately 7 tons) of trash from the Guadalupe River and Coyote Creek.

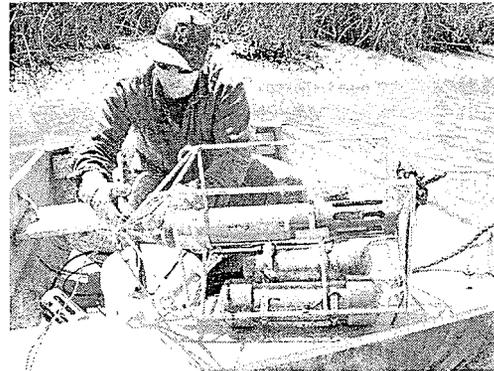
This year the City of San José and the Santa Clara Valley Water District (District) continued efforts associated with the Memorandum of Agreement for Trash Prevention and Removal (Trash MOA), which began in FY 04-05. The highlight of Trash MOA activities was the partnered clean-up projects on Coyote Creek. The Trash MOA calls for three partnered clean-up projects each calendar year that are intended to take place at locations that fall outside the normal scope of operations of the City and District. During this reporting period, two partnered clean-up projects occurred in the Coyote Creek Watershed and a third on the Guadalupe River. An estimated total of four tons of debris was removed.

In addition, ESD is investigating structural trash management controls. The City submitted a concept proposal to the State Water Board Consolidated Grants Program for funds to support implementation of a structural trash control pilot program. The grant concept proposal was not invited to the application stage, but City funds were budgeted to support much smaller scale implementation of trash controls (catch basin inserts, inlet bars, or underground separation units) in FY 06-07.

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Monitoring (MON)

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.



Watershed Protection Biologist collecting field data from Coyote Creek

Municipal Compliance (MC)

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. In FY 05-06, the City held over 75 sessions on various topics to ensure that City staff received training on procedures and issues related to stormwater programs. Trainings continued on the implementation of the New and Redevelopment (C.3) requirements with a strong focus on hydromodification measures. Also, the City received several presentations by stormwater product vendors.

To ensure stormwater compliance at City properties, Corporation Yards were routinely inspected for stormwater permit compliance. An annual inspection was conducted at each of the six yards



Fuelling island at Mabury Corporation Yard

during the first quarter of 2006. Quarterly hazardous material inspections, which include stormwater issues, were also conducted in FY 05-06. A Corporation Yards' Pollution Prevention Team (P2 Team) was formed in December 2004. The responsibilities of the team are to review and update Corp Yard Stormwater Pollution Prevention Plans (SWPPPs), assess the Corp Yards for current stormwater best management practices (BMPs) in use, determine if new BMPs should be included in the SWPPPs, and assist in implementing the SWPPPs (e.g.

training). SWPPP revisions for three of the Corp Yards (Mabury, South, and West) were drafted in FY 05-06 and are currently under review. Also, SWPPP training was conducted at all six of the Corp Yards in June 2006. On average, 93% of the employees responded that the BMPs taught were appropriate for their work. The combination of site inspections and the semi-annual

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meetings appears to be working well. The concerns identified in the Corp Yards' inspection reports are usually minor and resolved swiftly.

Public Information / Participation (PIP)

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.

The City participates in and supports a wide variety of stormwater outreach and education activities, including many in collaboration with other local and regional agencies. Highlights for FY 05-06 include: continued stenciling of storm drain inlets throughout the City with the appropriate neighborhood creek name and 945-3000 hotline number; providing access and supplies for multiple creek clean-up sites; training sessions for developers on construction requirements; and conducting four Wacky Watershed teacher training workshops to 40 teachers. Outreach continues to be a vital tool for inspectors, allowing for direct education of polluters and potential polluters. Education is the first step in the City's Enforcement Response Plan. Educating the youth of San José continues to be a priority, with several different programs targeting both students and teachers with watershed education.

The City also actively supports Program-wide outreach and education activities, including IPM outreach, Mercury outreach, and the Watershed Watch campaign. Coordinating outreach activities with the Program and Bay Area-wide efforts enables the City to deliver some of its pollution prevention message more effectively and at reduced cost.



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

Permit Reapplication

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. In the past, NPDES permits were issued separately to

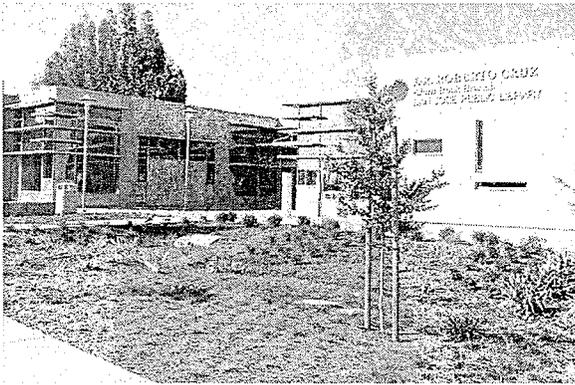
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Bay Area stormwater programs with staggered adoption dates, which often resulted in uneven and inequitable requirements.

City staff has dedicated numerous hours to participate in work groups convened to help develop performance standards for the Inspection and Outreach components of the new permit. Staff has also participated in the steering and stakeholder meetings convened by Water Board staff. City staff will continue to participate in the MRP process through the Program, BASMAA, and individually as a City. The Water Board is expected to adopt the MRP in 2007.

Conclusion

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



Alum Rock Library detention pond, a stormwater pollution treatment control measure

City actively participates in many local and regional efforts designed to leverage the most value for its resources and citizens. The City strives to be a leader in watershed protection, and continues to meet or exceed its permit-mandated obligations. Future fiscal years will bring new challenges, but the City is actively positioning itself to best meet these challenges and maintain the high quality of service its constituents expect.