



CONTRA COSTA CLEAN WATER PROGRAM

MANAGEMENT COMMITTEE MEETING AGENDA

Wednesday, July 20, 2022

1:30 PM to 3:30 PM

Join Zoom meeting:

<https://zoom.us/j/95398909729?pwd=blhxUkthU1pjYkFjREhncXJtV2NTQT09>

Meeting ID: 953 9890 9729 Passcode: 632133 Dial: 1 669 900 6833
One tap mobile: +16699006833,,95398909729#,,,,*632133# US (San Jose)

If you require an accommodation to participate in this meeting, please contact Michael Burger at 925-313-2360 or at michael.burger@pw.cccounty.us, or by fax at 925-313-2301. Providing at least 72 hours notice (three business days) prior to the meeting will help to ensure availability.

VOTING MEMBERS (authorized members on file)

City of Antioch	Phil Hoffmeister
City of Brentwood	Meghan Oliveira / Allen Baquilar
City of Clayton	Laura Hoffmeister/ Reina Schwartz
City of Concord	Bruce Davis (Vice-Chair)/ Kevin Marstall
Contra Costa County	Michele Mancuso/ Tim Jensen/ Allison Knapp
CCC Flood Control & Water Conservation District	Tim Jensen/ Michele Mancuso/ Allison Knapp
Town of Danville	Bob Russell/ Steve Jones/ Mark Rusch
City of El Cerrito	Stephen Prée/ Will Provost/ Yvetteh Ortiz/ Christina Leard
City of Hercules	Mike Roberts/Jeff Brown/Jose Pacheco/Nai Saelee/F. Kennedy
City of Lafayette	Matt Luttrupp/ Tim Clark
City of Martinez	Khalil Yowakim/ Frank Kennedy
Town of Moraga	Frank Kennedy (Chair)/ Shawn Knapp
City of Oakley	Billilee Saengcalern/ Frank Kennedy/ Andrew Kennedy
City of Orinda	Scott Christie/ Kevin McCourt/ Frank Kennedy
City of Pinole	Misha Kaur
City of Pittsburg	Jolan Longway/ Richard Abono
City of Pleasant Hill	Philip Ho/Ananthan Kanagasundaram/Frank Kennedy
City of Richmond	Joe Leach/ Mary Phelps
City of San Pablo	Amanda Booth/ Karineh Samkian/ Sarah Kolarik/ Jill Mercurio
City of San Ramon	Kerry Parker/ Robin Bartlett/ Maria Fierner
City of Walnut Creek	Lucile Paquette/ Neil Mock/ Steve Waymire

PROGRAM STAFF AND CONSULTANTS

Courtney Riddle, Program Manager	Andrea Bullock, Administrative Analyst
Karin Graves, Sr. Watershed Planning Specialist	Alina Constantinescu, Consultant
Erin Lennon, Watershed Planning Specialist	Mitch Avalon, Consultant
Dan Cloak, Consultant	Michael Burger, Clerk
Liz Yin, Consultant	Lisa Welsh, Consultant
Lisa Austin, Consultant	

NEXT MANAGEMENT COMMITTEE MEETING

Wednesday, August 17, 2022, 1:30 PM

**Contra Costa Clean Water Program
MANAGEMENT COMMITTEE MEETING AGENDA
Wednesday, July 20, 2022**

AGENDA

Open the Meeting/Introductions/Announcements/Changes to the Agenda: **1:30**

Public Comments: Any member of the public may address the Management Committee on a subject within their jurisdiction and not listed on the agenda. Remarks should not exceed three (3) minutes.

Regional Water Quality Control Board Staff Comments/Reports: **1:32**

Consent Calendar: **1:35**

All matters listed under the CONSENT CALENDAR are considered routine and can be acted on by one motion. There will be no separate discussion of these items unless requested by a member of the Management Committee or a member of the public prior to the time the Management Committee votes on the motion to adopt.

- A. APPROVE** Management Committee meeting summary (Chair)
 - 1) June 15, 2022 Management Committee Meeting Summary
- B. ACCEPT** the following subcommittee meeting summaries into the Management Committee record: (Chair)
 - 1) Administrative Committee
 - June 7, 2022
 - 2) PIP Committee
 - June 7, 2022
 - 3) Monitoring Committee
 - May 9, 2022
 - 4) Municipal Operations Committee
 - May 17, 2022
 - 5) Development Committee
 - May 25, 2022

Presentations: **1:40**

- A. Strategic Plan for Staffing the Clean Water Program (K. Graves)
 - a. See staff report for background information
- B. FY 22/23 Draft Adjusted Budget (M. Avalon, A. Bullock)
 - a. See staff report for background information
- C. Options to Fill the SUA Funding Gap – an Overview (M. Avalon)
 - a. See staff report for background information
- D. MRP 3.0 Checklist (S Mathews)

Actions: None 2:50

Reports: 2:50

- A. Status of Monsanto Settlement Agreement (K. Graves)
- B. C.3.j Forum at September 28 Development Committee meeting (determine attendees) (E. Lennon)

Updates: 3:05

- A. Personnel Update (K. Graves)
 - a. Status of Program Manager position
- B. BAMSC Steering Committee meeting (K. Graves)
- C. Annual Report (E. Yin)

Information: 3:20

- A. Management Committee Agenda Topics for FY 22/23 Q1

Old/New Business: 3:25

Adjournment: Approximately 3:30 p.m.

Attachments

Consent Items

1. *Management Committee Meeting Summary June 15, 2022*
2. *Administrative Committee Meeting Summary June 7, 2022*
3. *PIP Committee Meeting Summary June 7, 2022*
4. *Monitoring Committee Meeting Summary May 9, 2022*
5. *Municipal Operations Committee Meeting Summary May 17, 2022*
6. *Development Committee Meeting Summary May 25, 2022*

Presentation Items

7. *Staff Report on Staffing Plan*
8. *Staffing Org Chart*
9. *Administrative Costs Comparison*
10. *Staff Report on Draft Adjusted Budget*
11. *Draft Adjusted Budget Spreadsheet*
12. *Staff Report on Filling the Funding Gap*
13. *MRP 3.0 Checklist*
14. *MRP 3.0 Regional Projects*

Reports

Information

15. *Management Committee Agenda Topics for FY 22/23 Q1*

UPCOMING CCCWP MEETINGS

All meetings **will not** be held at 255 Glacier Drive, Martinez, CA 94553, but will be held virtually

August 2, 2022 1st Tuesday	Administrative and PIP Committee Meeting 9:30 a.m. – 12:00 noon
August 8, 2022 2nd Monday	Monitoring Committee Meeting, 10am – 12 noon
August 16, 2022 3rd Tuesday	Municipal Operations Committee Meeting, 10am-12 noon
July 27, 2022 4th Wednesday	Development Committee Meeting, 1:30 p.m.-3:30 p.m.
August 17, 2022 3rd Wednesday	Management Committee Meeting, 1:30 p.m.-3:30 p.m.

BAMSC (BASMAA) SUBCOMMITTEE/ MRP 3.0 MEETINGS

Times for the BAMSC (BASMAA) Subcommittee meetings are subject to change.

July 1, 2022	Effective date of MRP 3.0
1st Thursday	Development Committee, 1:30 – 4:00 p.m. (even months)
1st Wednesday	Monitoring/POCs Committee, 9:30 a.m. – 3:00 p.m. (odd months)
4th Wednesday	Public Information/Participation Committee, 1:30 – 4:00 p.m. (1 st month each quarter)
4th Tuesday	Trash Subcommittee, 9:30 a.m.-12 noon (even month)



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MANAGEMENT COMMITTEE MEETING MINUTES

06-15-2022

Attendance:

MUNICIPALITY	ATTENDED	ABSENT
City of Antioch	Phil Hoffmeister	
City of Brentwood		Meghan Oliveira
City of Clayton	Reina Schwartz	
City of Concord	Bruce Davis	
Town of Danville	Bob Russell	
City of El Cerrito	Christina Leard	
City of Hercules	Nai Saelee	
City of Lafayette	Tim Clark	
City of Martinez	Frank Kennedy	
Town of Moraga	Frank Kennedy (Chair)	
City of Oakley	Frank Kennedy	
City of Orinda	Frank Kennedy	
City of Pinole		Misha Kaur
City of Pittsburg	Jolan Longway	
City of Pleasant Hill	Frank Kennedy	
City of Richmond	Mary Phelps	
City of San Pablo	Amanda Booth	
City of San Ramon	Kerry Parker	
City of Walnut Creek	Lucile Paquette	
Contra Costa County	Michele Mancuso, Allison Knapp	
CCC Flood Control and Water Conservation District	Tim Jensen	

Program Staff: Karin Graves, Andrea Bullock, Michael Burger

Program Consultants: Liz Yin, Dan Cloak, Lisa Welsh, Yvana Hrovat, Alina Constantinescu, Mitch Avalon

Members of the Public/Others/Guests:

Introductions/Announcements/Changes to Agenda: Due to the Covid-19 pandemic, the meeting was conducted by video-conference call.

Public Comments: No members of the public called in.

Regional Water Quality Control Board Staff Comments/Reports: Regional Board staff did not call in.



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1. **Roll call was taken and the meeting was convened by the Chair at 1:30 p.m.**
2. **Announcements:** There were no changes to the agenda. Mitch Avalon announced that Karin Graves would not be in attendance so Presentation Item B would be continued until the next meeting.
3. **Consent Calendar:** Amanda Booth (San Pablo) submitted comments on the Alternative Compliance item on the Management Committee meeting minutes. Bob Russell (Danville) motioned to approve the Management Committee meeting minutes with changes noted, Kerry Parker (San Ramon) seconded. The Chair called for a vote, there were no objections or abstentions. The motion passed unanimously and the minutes were approved with the changes noted.
4. **Presentations:**
 - a. **Filing a Claim for Unfunded Mandates (M. Avalon):** At the last Management Committee meeting the topic of increases to the budget due to MRP 3.0 was discussed. The current budget reserve is around \$3M. The FY 22/23 budget was over the \$3.5M budget threshold by ~\$1M.

To help offset the budget overages and increased costs throughout the permit cycle, there were two options: an unfunded mandate application and a TSO (time schedule order).

The unfunded mandate process is long and labor intensive. It must first be shown that there is a State requirement that surpasses requirements on the federal level and that this requirement is unfunded. The State checks the claim against 2 tests: does the requirement exceed federal requirements and does the claimant have the authority to adopt fees/taxes/assessments to pay for the increased cost. If a municipality has the ability to adopt fees, then it is not an unfunded mandate. If both tests pass, the claim is filed and the Commission on Unfunded Mandates staff will review the claim to make sure that it is complete before it is accepted. The commission will then file a notice of completion and send the application out to all interested parties for a comment period. Claimants can rebut any comments that are made during this period. Staff then drafts a decision on the claim, which is then sent out for comment again. If the claim is then approved, Staff would prepare parameters and guidelines for reimbursement, which is then sent out for an additional comment period. It is then taken before the commission for approval. If it is approved, the claim is sent to the State Controller. The Controller will issue instructions on how to file a reimbursement. Twice a year, the Commission submits a list of eligible claims to the legislature for reimbursement. The legislature uses



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this report to formulate a budget. If the legislature does not fund the claims, there is an additional process to appeal this.

Mitch Avalon noted that there was a court case currently in the appellate court that could impact claims for stormwater permits. The lawsuit was in San Diego county and the State claims that SB 231 (the law that allows an agency to establish a stormwater fee without a vote because stormwater was defined as “sewer” and therefore falls under the exemption of “sewer” in Prop 218) causes stormwater to fall under the sewer exemption. The State argued that the State isn’t required to fund stormwater mandates because municipalities have the ability to adopt a fee or assessment to fund their stormwater programs under these decisions. Depending on the outcome of this case, this could shut the door on most future unfunded mandate claims for stormwater. Mitch Avalon noted that there are a large number of claims that are waiting to be heard and are being held up by this court decision. Additionally, even if a claim is successful, the state legislature may not appropriate funds for reimbursement. This path is far from a certain way to acquire funding.

Michele Mancuso (Contra Costa County) asked if homeless requirements would be considered a new mandate. Mitch Avalon noted that this was a legal question and would need to be investigated by Program attorneys. He further noted that homeless discharges were not a direct requirement of the Clean Water Act, which might provide a better cause to bring a claim before the commission in the future.

TSOs (time scheduled orders) were a way to request the Regional Board to modify a compliance schedule. This is similar to a Notice of Violation but was effectively preemptively addressing requirements that cannot be met by the deadlines set out in the permit. The Regional Board must agree that the Permittee cannot meet the requirements by the deadline. An application for a TSO would then be submitted and the Regional Board would need to approve it. It would include a plan outlining the steps to be taken to come into compliance. TSOs don’t provide funding directly but do offer an extended time frame for compliance. TSOs also do not protect against 3rd party lawsuits under the Clean Water Act.

An unfunded mandate claim would need to be filed within a year of the beginning of the permit requirement or the cost associated with the requirement. Staff recommended preparing the claim 6 months before the deadline. A similar recommendation of 6 months was suggested for TSO applications.

The Administrative Committee recommended keeping both options open. With direction from the Management Committee, Staff would add this topic to the January agenda items to discuss filing an unfunded mandate claim or application for TSO.



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Lucile Paquette (Walnut Creek) asked if the budget should be readdressed with this information in mind and whether staff was considering adjustments to the budget. Mitch Avalon noted that applying for an unfunded mandate was similar to applying for a grant: it requires a lengthy application process (which takes time and money) and wasn't a guaranteed source of funding. The Program attorney noted that the chances of a successful unfunded mandate claim were small. Additionally, the FY n23/24 budget process in December could provide an opportunity to create a tighter focus on the budget and address where unspent funds could be redirected. It was also noted that an adjusted budget would come to the Management Committee in August. This budget would address advance work, other items that were not included in the original budget and may address some conditional approval items. The budget does not carry over from year to year, and any funds not spent at the end of the FY would be put into the reserves.

Mitch Avalon suggested that there were reports (such as the impracticability report) that could be used as support for a TSO. This could be done collectively, but that would have to be a policy-level decision.

- b. **Strategic Plan for Staffing the Clean Water Program (K. Graves):** This presentation was continued to the July meeting.
- c. **FY 21/22 Annual Report Forms and Schedule (L. Yin):** Liz Yin displayed the permittee draft annual report timeline, which would be made final after the meeting. Following the meeting, this timeline would be posted to Groupsites and distributed to the committee. The annual report forms were currently available on Groupsites. Permittees were asked to enter GIS data for C.3 and C.10 (AGOL) by the end of the month. Liz Yin reminded the Committee that SMARTS was implemented as the submittal platform last year and would be used again this year (and into the future). Permittees should make sure that information on their Legally Responsible Person or authorized representative be reviewed and be in conformity with the information in the SMARTS system. If there were no changes from last year, no further action was required.

September 6 is the anticipated release of the Program's Group Annual Report. The Program had received some feedback that additional time may be needed for the Group Annual Report to be brought to municipal councils for approval. Staff proposed that instead of presenting the report at the September 21 Management Committee meeting, a special meeting be scheduled immediately after the September 12 Monitoring Committee meeting. The report could be presented and the final draft could be approved then, providing two weeks for Permittees' councils to approve the report. The finalized annual report was anticipated on September 15 and would be made available on Groupsites for Permittees to download. The Permittees would need to submit their reports (alongside the Program's Group Annual Report) to SMARTS by Sep 30.



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Michele Mancuso (Contra Costa County) asked if each permittee should upload their report to Groupsite or send it to Staff. Liz Yin confirmed this, noting that it should be uploaded to Groupsite or be sent to her but reminded Permittees that they would still need to submit their own report to SMARTS. The Chair recalled the problems with SMARTS implementation last year and asked if adjustments had been made to the platform to accommodate the number of uploads. Liz Yin noted that she didn't have that information and Permittees were recommended to get ahead of any submittal issues by submitting at the earliest time.

Mitch noted that the Management Committee needed to approve the September 12 Special Meeting. Lucile Paquette (Walnut Creek) asked if a vote could be submitted by email in absentia. Mitch Avalon confirmed this was possible. The Committee agreed to hold a special meeting on September 12 to approve the Group Annual Report.

5. Actions: There were no action items for consideration during the meeting.

6. Reports:

- a. Status of Monsanto Settlement Agreement (K. Graves):** Mitch Avalon noted that there was no update on the Monsanto Settlement. The date to opt out had been extended to July 25. Allison Knapp (Contra Costa County) confirmed this and noted that the county held a closed session of the Board of Supervisors to discuss this topic but the decision was not publicly available.

Amanda Booth (San Pablo) asked if the Permittees could develop coordination once decisions had been made about opting in or out. Mitch Avalon suggested that Karin Graves had offered to keep track of that at the last Management Committee meeting and was tracking the information. Any Permittees that had an official decision should send that information to Karin Graves.

- b. Report on C.3 training held on May 23, 2022 (D. Cloak):** Dan Cloak started by explaining the history of the annual LID Workshop. These workshops are an opportunity to engage users of the Stormwater Guidebook and receive feedback to be used in future updates to the guidebook as well as provide tools and information to professionals and municipal staff. The objective is to integrate stormwater treatment facilities in highly visible, high traffic areas to ensure maintenance and sustainability.

The workshop was scheduled as a webinar for the second year in a row. An in-person workshop had originally been planned, but Staff shifted to a webinar based on advisories from the County Health Officer. There were about 140 participants, split evenly between professionals and municipal staff. Only about 45% had previously attended one of the CCCWP workshops, indicating a continued need to host these workshops due to participant turnover. The content of the workshop focused on the



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basics of C.3, changes to provision C.3 in MRP 3.0, green infrastructure design, and a panel discussion on key topics of concern. The post webinar survey was included in the agenda packet.

- c. **MRP 3.0 Provision C.3: Urgent Permittee Implementation Items (D. Cloak):** At the Development Committee meeting on May 25, the committee had the opportunity to discuss the implications of the adoption of the new permit. The Development Committee identified several items that, due to the requirements and expectations in the permit, created a need to start work early. Three items were identified: the need to inform communities regarding the changes presented in MRP 3.0 for new development, evaluating how changes affect road maintenance and construction projects, and the green infrastructure retrofit assignments to each Permittee.

1. **Planning and Development Community Notification:** Developers, staff, and the community would need to be aware that single family homes (which were previously exempt) are now considered regulated projects. All other projects had a reduced threshold from 10k sqft. to 5k sqft. to trigger LID requirements. 5k sqft of parking lot was now also subject to C.3 requirements.

Matt Luttrupp (Lafayette) asked about the repaving or reconstruction of private roads noting that municipalities don't generally require permits for the paving of private roads; how do permittees ensure private road paving projects comply with permit requirements. Dan Cloak noted that the permit describes that the requirements were "subject to the planning or building authority of the Permittee." Dan Cloak also noted that Water Board Staff had provided a reference in the footnotes of the permit that support the information presented. These changes don't take effect until July 1, 2023. The Chair noted that an update from the program would ensure consistency of information and ensure that all municipalities were interpreting the requirements the same way. The Committee directed the Development Committee to work on an informational C.3 update to distribute to all Permittees.

2. **Road Maintenance:** the threshold for new trails was now 5k sqft. Maintenance projects were previously exempt but now had a threshold of 1 contiguous acre. Dan Cloak noted that the 1 acre threshold may result in some municipalities having few or no projects that trigger this requirement. The table in the agenda packet would provide guidance on where to go for help interpreting the requirements. These changes don't take effect until July 1, 2023; projects beginning before this are exempt. Mitch Avalon suggested a workshop or training in December to go over the requirements with interested permittees.

Reina Schwartz (Clayton) asked if municipal paving programs were subject to these requirements. Dan Cloak noted that there were two different thresholds for the projects: one for private projects and one for public right of way. Private projects



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were subject to the 5k sqft. threshold. Overlays were still exempt but if there was a project where base course would need stabilization (such as base course reclamation) this could trigger the requirements. These projects would fall under the 1 acre threshold.

Lucile Paquette (Walnut Creek) asked if this would count for the retrofit numbers in C.3.j. Dan acknowledged they would get credit for that work allowed in C.3.b.

3. Green Infrastructure Retrofit: Dan Cloak noted that there were retrofit requirements that each Permittee had been assigned. There were a number of ways to satisfy these projects but there was the potential that some municipalities would have difficulty to find enough projects. A table of appropriate projects was provided in the presentation. Road reconstruction could be used but it would depend on the overall size of regulated projects. Dan Cloak noted that there were ways to increase Green Infrastructure requirements by finding low cost applications in existing areas.

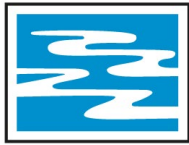
Phil Hoffmeister (Antioch) asked what completed projects were defined as meeting the requirement for C.3.j. Dan Cloak noted that this was ambiguous and the Committee discussed the timeframes for project completion and approval.

Dan Cloak asked if the information in the presentation was sufficient to begin the process of working on the three topics. He suggested that a forum where all permittees (not just Development Committee) could provide feedback and information be created. Mitch Avalon agreed and suggested that the forum be assigned to a committee that would be responsible for compiling and disseminating the information gathered. Dan Cloak noted that the Development Committee would be an appropriate choice, since much of the committee meetings in the last year have been dedicated to GI development plans.

The Management Committee directed the Development Committee to begin working on this project.

- d. **Feedback on Using Social Media and Newsletter Outreach Materials (H. Pierce):** Staff had discussed the transition from Sagent to SGA as public information and outreach consultants. The materials that had been developed by Sagent were discussed. The question was whether materials similar to what Sagent had created for social media and the newsletter would be continued.

Hilary Pierce displayed the June newsletter and noted that a newsletter development and distribution was currently done monthly. She asked the Committee members if they had found distributing the newsletter to be useful. If the newsletter wasn't useful, it was proposed that the newsletter would stop being developed and the funding for it could



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be directed to other outreach options. The Committee noted that the newsletters were not being used. It was suggested that SGA be consulted on the pros and cons of the newsletter. Hilary Pierce would be meeting with SGA to discuss the newsletter with an emphasis on incorporating useful topics, but it seemed the newsletter was not being distributed in general. Lucile Paquette (Walnut Creek) noted that San Mateo also works with SGA and they have created more engaging marketing. Permittees were encouraged to look on their website for ideas.

Hilary Pierce noted that social media content and calendars for Facebook and Instagram were developed monthly. Social media posts would continue to be developed for the Program, but Permittees that wanted to see specific topics should let the Program know. Michele Mancuso (Contra Costa County) noted that there had been discussion of reducing the newsletter frequency. Hilary Pierce confirmed that there had been discussion of reducing the Newsletter from monthly to quarterly, if it would increase the benefit of the newsletter, but no decision had been reached.

Further thoughts or comments can be sent to Hilary Pierce.

- e. **Status of Appealing MRP 3.0 Final Order (M. Avalon):** The Program did not file an appeal. Staff considered the history of the permit negotiations and at the May Management Committee meeting it was decided that no appeal was going to be filed. At the June Administrative Committee meeting, the option to file a last minute petition had been discussed but it was decided not to move forward with the petition. Baykeeper had filed a petition and the Program would have the opportunity to provide comment on the petition.

7. Updates:

- a. **Personnel Update:** The only update on personnel was that the Program had hired a Watershed Management Planning Specialist, her name was Erin Lennon. She will be starting June 20.
- b. **BAMSC Steering Committee meeting:** BAMSC began discussions on regional projects and how to pay for them. Given its proximity to the Permit adoption hearing, the BAMSC committee didn't have many topics to discuss.

8. Information:

- a. **Submit documentation of PCBs in applicable building demolition projects:** This information is available in the agenda packet.
- b. **Annual review/update of website pages and waste disposal information:** This information is available in the agenda packet.



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- c. **CASQA Quarterly meeting “Call to Action: Stormwater is a Resource”, July 13 (A. Bullock):** This information is available in the agenda packet.
 - d. **Baykeeper May 31, 2022 letter to the editor regarding MRP 3.0 (M. Avalon):** This information is available in the agenda packet.
9. **Old/New Business:** There was no old or new business.
10. **Adjournment:** The Chair adjourned the meeting at 3:22 p.m.



ADMINISTRATIVE COMMITTEE SUMMARY

Meeting Minutes

Tuesday, June 7, 2022

10:30 – 12:00

VOTING MEMBERS	ATTENDED	ABSENT
City of Antioch	Phil Hoffmeister	
City of Brentwood		Meghan Oliveira
Town of Danville	Bob Russell	
Contra Costa County	Michele Mancuso	
CCC Flood Control and Water Conservation District	Tim Jensen	
City of Hercules	Jeff Brown	
City of Pleasant Hill	Frank Kennedy	
City of Moraga	Frank Kennedy (Chair)	
NON-VOTING MEMBERS		
City of Walnut Creek	Lucile Paquette	
City of San Pablo	Amanda Booth	
City of Pittsburg	Jolan Longway	

Program Staff: Karin Graves, Andrea Bullock, Michael Burger

Consultants: Mitch Avalon

Guests: Allison Knapp

- 1. Convene meeting and roll call (Chair):** The Chair convened the meeting at 11:02 a.m.
- 2. Announcements or Changes to the Agenda (Committee):** There were no changes to the agenda. Frank Kennedy (Moraga) announced that he was the new Chair of the Administrative Committee for Fiscal Year 22-23.
- 3. Receive Nominations and Approve Vice Chair (Chair):** Jolan Longway volunteered to be Vice Chair. The Chair called for a vote. There were no objections or abstentions. Jolan Longway's (Pittsburg) nomination for Vice Chair was approved.
- 4. Approval of May 3, 2022 Meeting Minutes (Chair):** Bob Russell (Danville) moved to approve the minutes with no changes, Michele Mancuso (County) seconded. The Chair called for a vote. There were no objections or abstentions. The motioned passed unanimously and the May 3, 2022 Meeting Minutes were approved.

- 5. Status of Appealing MRP 3.0 Final Order (M. Avalon):** Mitch Avalon began by noting that the new Permit was approved on May 11 which initiated the 30-day period to file a petition. This petition would effectively be an appeal to MRP 3.0. The Management Committee discussed the options, but there was no direction to file an appeal. This lack of direction effectively precluded the Program from filing an appeal due to time constraints on the creation of a petition. The reasoning was that the Regional Water Board has already heard the arguments from the Permittees, and it was unlikely to have success at the state level. Also, the appeal would not modify the Permit, but would rather allow Permittees to file a lawsuit, which was a potentially long and difficult legal process. Two other counties were likely to file a petition, which would benefit the Program.

Baykeeper had sent a letter to several Bay Area newspapers indicating their intention to file a petition against the State Water Board. The Program's attorney informed the CCCWP that if Baykeeper files an appeal, the Program would have a chance to comment on their petition.

Unless directed otherwise, staff will not prepare a petition to the state water board to appeal MRP 3.0. The Chair noted that there doesn't appear to be a significant benefit to filing a separate appeal and that the efforts from the appeals of other Permittees would provide a similar benefit. Lucile Paquette (Walnut Creek) asked if there was any information on what grounds the other counties were appealing. Mitch Avalon and Karin Graves indicated that they didn't have that information. Bob Russell (Danville) asked what the estimated chances of Baykeeper winning their appeal were and what impact that would have on the Program. Mitch Avalon noted that if the appeal was successful, the Baykeeper's position that monitoring requirements weren't stringent enough could sway the State Board and increase monitoring requirements. It was difficult to determine what effect this would have on the Permit, but it was suggested that the permit could be remanded to the Regional Water Board for additional consideration. The Chair proposed that certain types of monitoring have yielded reports that implied further monitoring would not provide new information and suggested that this could be a poignant argument in any comments on the Baykeeper appeal.

- 6. Filing a Claim for Unfunded Mandates (M. Avalon):** At the last Management Committee meeting, there was a question about alternate actions if no appeal was being considered. There were two options from the Program's perspective: an unfunded mandate claim and a time schedule order (TSO).

An unfunded mandate is a requirement that exceeds Federal statutes. A claim could be filed within 1 year of the effective date of the requirement or 1 year of the start of funding the requirement. The claim must prove that the mandate exceeds Federal requirements and would impose a cost. Commission staff would determine if the claim was complete. The process is long and arduous. A claim filed to the commission is similar to a class action lawsuit in that it impacts not only the claimant but any other organization that is in a similar situation, so each phase of the process requires a lengthy comment period. Ultimately, the commission will approve or deny the claim. The state controller will then issue claiming instructions that claimants must comply with. There is no guarantee that a claim will be successful; several Permittees have filed a claim in MRP 1.0 and 2.0 that are still waiting for a decision. Even after a successful claim, the state legislature would still need to appropriate funds.

A time schedule order is a proactive way to amend compliance schedules where permittees could not meet the permit requirements. This would come before a Notice of Violation and provide the regional board staff with a plan to meet permit requirements that a Permittee knows they would be unable to comply with. This order does not protect the permittee from legal action by 3rd parties that are affected by non-compliance.

Michele Mancuso (Contra Costa County) asked what the time frame for filing a TSO was. Mitch Avalon noted that there was no time frame, but it would need to be in place before the deadline for a requirement to avoid being in non-compliance. He recommended at least 6 months before the deadline to be safe. The Committee discussed example timeframes for TSO applications. Mitch Avalon suggested that an outline or process could be developed to determine the application period for a TSO. The Chair suggested that, based on Moraga's timeframe for complying with full trash capture, paperwork for filing a TSO should start sooner rather than later. Mitch Avalon suggested that it would be beneficial to have a record of attempting to comply with requirements before beginning the application process. Lucile Paquette (Walnut Creek) asked if this was similar to the Revised Trash Plans. She also asked if the TSO had to include what was needed to comply with the requirement. Mitch Avalon confirmed that the Revised Trash Plan could be an opportunity to develop a functional equivalent of a TSO. He also noted that the impracticability report could similarly be a TSO. The TSO was not a legal process but was a procedural/administrative process and it would likely start with a meeting with the Regional Board. The Committee discussed strategies that could be used by Trash Workgroups to utilize TSOs. The Chair reminded the Committee that trash credits and offsets are also being removed.

Strategic Plan for Staffing the Clean Water Program (K. Graves): The Program was putting together a strategic plan for staffing in a report for the Management Committee later this month that would highlight the various staff transitions happening. Karin Graves was looking for input and feedback on the report outline and proceeded to review the proposed outline.

The report would review the status of the Program Manager position and temporary backfill of the Senior Watershed Management Planning Specialist while Karin Graves was the Acting Program Manager. The strategic plan would also designate primary and secondary consultants for augmented staff and technical support work. The report would also outline the staffing contingencies in place and allow for a return to a consultant heavy model should the need arise.

Lucile Paquette (Walnut Creek) suggested that Permittees would want to know the prospective fiscal impact and salary savings based on the different options for staff augmentation and Karin Graves noted that this information was being developed and would be included in the report.

- 7. Approve June 15, 2022 Management Committee Agenda (Committee):** An updated agenda had been sent out prior to the meeting, that included the Baykeeper Letter, urgent Permittee implementation items report, the annual report form, and feedback on social media.

Mitch Avalon announced each Presentation, Action, Updates, and Information item on the agenda and gave a brief overview of each. Lucile Paquette (Walnut Creek) noted that the Urgent C.3

Permittee Implementation Items had been discussed at the Development Committee and asked if LWA was setting up list of changes and carryovers for the next permit cycle. Mitch Avalon confirmed that the Program was working on creating this checklist and that the C.3 provision was being discussed in June because it was the most urgent and impactful to Permittees. Lucile Paquette (Walnut Creek) further suggested the Presentation Item A (Status of Appealing MRP 3.0) should be a report since the window for filing a petition will have passed by the date of the meeting.

Phil Hoffmeister (Antioch) motioned to approve the agenda with presentation A moved to the report section, Jolan Longway (Pittsburg) seconded. The Chair called for a vote. There were no objections or abstentions. The motion passed unanimously and the agenda was approved with changes noted.

8. **Old/New Business:** The next meeting is scheduled for July 5, which is close to the July 4 holiday. Mitch Avalon asked if the Committee wanted to keep the date. The Committee discussed the availability of a quorum for the meeting. The Committee decided to retain the July 5 meeting date.

9. **Adjournment:** The Chair adjourned the meeting at 11:42 a.m.



PUBLIC INFORMATION/PARTICIPATION COMMITTEE
MEETING MINUTES

Tuesday June 7, 2022 9:30 am – 11:00 am

Zoom Meeting

Voting Members	Attended	Absent
City of Antioch	Julie Haas-Wajdowicz	
CCC Flood Control and Water Conservation District	Michele Mancuso	
City of Orinda	Kevin McCourt, Frank Kennedy	
City of San Ramon	Kerry Parker	
Administrative committee	Attended	Absent
Members acting as PIP Members		
City of Brentwood		Meghan Oliveira
Town of Danville	Bob Russell	
Contra Costa County	Michele Mancuso	
City of Hercules		Jeff Brown
City of Pleasant Hill	Frank Kennedy	

Program Staff: Andrea Bullock, Michael Burger

Consultants: Mitch Avalon, Hilary Pierce

Guests: Anna Minard, Finnisha Eastman

- 1. Introductions, Announcements, and Changes to Agenda (Chair):** The Chair was absent, the Vice Chair noted they would be leading the meeting. Hilary Pierce noted that an update on changes to the CCCWP website would be added to the meeting.
- 2. Consent Items Approval (Chair):** Frank Kennedy (Orinda) motioned to approve the consent items; Bob Russell (Danville) seconded. The Vice Chair called for a vote. There were no objections or abstentions. The motion passed unanimously, and the consent items were approved.
- 3. July PIP Committee Meeting Date (H. Pierce):** The July PIP committee meeting is scheduled for July 5. The Program wanted to determine if this should be changed due to proximity to the July 4 holiday. Lucile Paquette (Walnut Creek) asked if the Administrative Committee would also be asked if they were changing their meeting date as well. Mitch Avalon confirmed this. The Committee discussed their availability. The Committee decided to retain the July 5 date.
- 4. FY 22/23 PIP Committee Meeting Times (H. Pierce):** The calendar of Fiscal Year 22-23 meetings was displayed. Hilary Pierce explained that the membership of PIP still required the PIP



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meeting to be paired with the Administrative Committee meeting. The times would change slightly to provide time for discussion of new provision requirements. For the foreseeable future, these meetings will be held remotely via Zoom. Hilary Pierce noted that the calendar would be distributed to Committee members after the meeting.

5. **CCCWP Brochures Update (H. Pierce):** The Program is working on the list of recommended brochures to update. The brochure archive spreadsheet had been shared, but there was not much feedback from this. Based on the feedback from the Committees, the Program would rank the brochures and determine the cost to have them updated. The brochures identified for potential update were BMPs for auto shops, BMPs for restaurants, Trash BMPs, Draining Pools and Spas, and Wash Water Disposal. New brochures had also been requested.

In June, each subcommittee will review their portion of the CCCWP website. Members were requested to look at the website and submit requested changes. June 24 was the requested deadline so that changes could be finalized by the end of the month.

Lucile Paquette (Walnut Creek) asked if this would be discussed at Management Committee. Hilary Pierce confirmed that this would be presented at the June 15 Management Committee meeting. Lucile Paquette (Walnut Creek) asked in terms of what was needed versus what was wanted, how were priorities being determined. Hilary Pierce suggested that brochures that were needed would be prioritized over brochures that were just wanted. A focus on updating frequently used brochures was also noted. Topics that were missing brochures and where no alternatives (such as from other organizations) were available would then be prioritized. The budget for FY 22-23 is very tight, so there may not be enough funds to address all desired brochure changes. Mitch Avalon added that the prioritization would be brought to the Management Committee to be approved before production would begin. Specific details of brochure changes would be worked out at the committee level, then a cost estimate would be developed before moving forward.

6. **Fish Risk Video Draft (Sagent):** Anna Minard shared the latest Fish Risk draft video and noted that there were still updates in process. She requested feedback based on the video. Michele Mancuso (Contra Costa County) noted that the video was very professionally done. She indicated that the spelling of PCBs (polychlorinated biphenyls) was incorrect. She also suggested that a better depiction of the bioaccumulation process and updates to the shared posters that show portion size were desired in the video. The Vice Chair agreed but thought that the poster should be featured earlier in the video. She further suggested that the apostrophes used in PCBs and Omega-3s should be standardized. The Committee suggested that the CCCWP logo be displayed more prominently. Lucile Paquette (Walnut Creek) suggested that deferring the video into July may allow the Program to claim the video development on the new Fiscal Year requirements. She made note of the language availability of the fish risk information. She asked what the distribution of the video was going to look like.

Anna Minard noted that the video had originally been planned as a series of videos, but she would need to talk to Program Staff about shifting it to July. The video would be shared on the



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YouTube page, the Program website, social media pages, and it will be provided to the Permittees to distribute through their preferred channels. Mitch Avalon suggested that the work could be done in June, but it could be approved by the Committee later and would count toward the Fiscal Year in which it was approved.

Hilary Pierce suggested changing the closed captioning options to make them easier to see (size, typeface, and location were noted). Amanda Booth (San Pablo) asked that the video be made available in other languages. The Committee discussed changes to the bioaccumulation segment to make it more understandable.

7. **Caltrans Outreach Campaign Partnership Media Plan (Sagent):** Anna Minard announced the proposed media plan for the Caltrans media campaign. It would run from 8/29 through 9/25. The focus would be on outdoor media tactics (such as bus ads and bus shelters). Radio would also be used and would be broadcast in both English and Spanish. Caltrans would be using different stations for their broadcasts, so additional impressions were expected. The Caltrans radio ads were scheduled to run through October. The total cost of the media campaign was ~\$50k with 8.5M estimated impressions.

Anna Minard noted that there were a couple options for creatives in the Caltrans partnership. The first was to use existing Caltrans creatives, the second was to design and produce custom creatives for the Program (subject to Caltrans approval), and the third option would be to use left over imagery from Caltrans to design creatives for the Program (these would also be subject to Caltrans approval).

She shared the existing Caltrans creatives and noted that they were available on the Caltrans resource webpage. Frank Kennedy (Orinda) suggested that the options of preexisting creatives did not generally represent Contra Costa County closely enough, but the creative focused on storm drains would be a good choice. Julie Haas-Wajdowicz (Antioch) suggested that the beach was a good one, even if it wasn't strictly local. Lucile Paquette (Walnut Creek) suggested that staging for custom creatives would increase the cost to the Program. Anna Minard confirmed this and also noted that the creatives were subject to Caltrans approval and could potentially lead to having to reshoot any custom imagery one or more times.

Michele Mancuso (Contra Costa County) asked about other pictures from the non-Contra Costa creatives, particularly the Ventura options. Based on the feedback received, Anna Minard displayed the other available options. The Committee had favorable opinions of the alternate imagery. Anna Minard asked if the interest was more for these alternate options than the pre-made Caltrans creative. The Committee indicated that the alternate imagery from the Ventura creatives was a more favorable option.

The Vice Chair called for a vote to approve moving forward with the media plan. Michele Mancuso (Contra Costa County) motioned to approve; Frank Kennedy (Orinda) seconded. The Vice Chair called for a vote. There were no objections or abstentions. The motion passed.



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unanimously, and the Committee approved Sagent to move forward with the media plan using the alternate imagery.

8. **Adjournment:** The Chair adjourned the meeting at 10:24 a.m.

**Monitoring Committee
Meeting Minutes
May 11, 2022**

VOTING MEMBERS		
MUNICIPALITY	ATTENDED	ABSENT
City of Pittsburg	Joe Camaddo (Chair)	Jolan Longway
CCC Flood Control District	Beth Baldwin (Vice-Chair) Michelle Giolli	
City of Antioch		Phil Hoffmeister
City of Pinole	Misha Kaur	
City of Richmond	Terri Mason	
City of Walnut Creek	Lucile Paquette	
Non-Voting Members		
City of San Pablo	Amanda Booth	
Program Staff and Consultants		
Augmented Staff	Lisa Welsh / Lisa Austin	
Program Staff	Karin Graves	
Program Consultant	Mitch Avalon	
Brian Laurenson	LWA	

- **Introductory Remarks, Announcements, and Changes to the Agenda.** Joe Camaddo opened the meeting with a quorum. Lucile noted that there are a lot of requirements/deadlines in C.11/C.12 (d to g) and if asked if the committee could look at the meeting topics spreadsheet and see when it makes sense to discuss.
- **April 2022 Meeting Summary.** City of Walnut Creek (L. Paquette) moved to approve the April 2022 meeting summary with a minor revision to the C.12.c section noting that, “it would be helpful to” rather than “should” include all Applicable Structures including those without PCBs >50 ppm. CCC Flood Control District (B. Baldwin) seconded and City of Pittsburg (J. Camaddo) abstained.
- **East County Update.** Brian Laurenson (LWA) provided an update on the Delta RMP and other Region 5 monitoring/TMDL topics (see Attachment 1a for slide deck):
 - There have been substantial staffing changes at the RWB (see slide 2).
 - Delta RMP became a non-profit in July 2021 and the board of directors is comprised of all permittees (i.e., no RWB staff). A resolution was adopted by the RWB that is very permit-like but not an official amendment to the permit.
 - In general, RWB and Staff have been slow to respond. Permittees submitted their RAAs, which require EO approval, three years ago. RWB Staff have not yet issued comments. Monitoring plans will commence after comments are received.
 - Lauren Smitherman is the main contact for the methylmercury TMDL. Phase 1 is ongoing and includes R5’s review of the TMDL. Phase 2 is the implementation phase

and starts in October 2022. It seems like there are not going to be many changes to the program and that the current waste load allocations will remain. RWB has indicated that the time and place to provide feedback will be during the CEQA process. Brian L. will check in on the RWB schedule and timeline. (Update from Brian on 5/10 – R5 is still drafting the methylmercury BPA Staff Report which will go out for review in mid to late summer. They expect a hearing in 2024 and submission to the State Board in 2025.)

- Region 2 MRP 3.0 Provision C.19 is probably sufficient to also meet Region 5 pyrethroid requirements. Pyrethroid TMDL is supposed to be attained by 2039. It will likely be done through replacement.
 - Recent 303(d) listings in Contra Costa County include Sand Creek for dissolved oxygen and Dry Creek for toxicity.
- **MRP 3.0 Hearing Updates.** Lisa A. reviewed the agenda for the MRP 3.0 hearing on May 11. The meeting will start at 9 am, with a few internal agenda items. Then, RWB Staff will provide a 30-min presentation followed by the permittee's coordinated presentation (also 30 mins), and then the 3-min public comment presentations. Lisa A. reviewed the preliminary list of presenters and topics for the public comments.
 - Reid Bogart and Chris Sommers will share the coordinated 30-min presentation. Lisa A. reviewed the talking points and the slides with the redline. Redline will be shown on the slides so that it is on the record.
 - The committee discussed how for C.11/12 there are options other than GSI implementation for treatment of PCBs. GSI implementation is costly and does not provide significant load reduction compared to other measures, such as abatement. Following through on referral and abatement for source properties will help to meet the requirement for the number of acres to be investigated. The specific accounting for load reductions will be worked out during the first year(s) of the permit.
 - The committee agreed that Lisa A. will do a 3-min presentation on behalf of the Contra Costa permittees on C.11/12. Significant time and resources are needed to engage with property owners, obtain site access, and coordinate treatment. Need collaboration with RWB Staff to support efforts on permitted sites. Lisa A. will draft a few slides and share them with the committee by EOD for comments and revisions. Lisa A. will also present the correction that should be made in Table H-1 for the population of Unincorporated County. (Update: see Attachment 1b for 3-min presentation.)
 - **May 4th BAMSC MPC Meeting Summary.** Lisa W. reviewed the SPLWG special study proposals to be discussed at the SPLWG meeting on May 23 and 25 (see Attachment 1c). Four of the five proposals support modeling, either directly or indirectly through the collection of monitoring data for model calibration. Modeling is for POCs (PCBs and mercury) and CECs (PFAS). SFEI has developed a model for estimating PCBs and Hg (not to replace the RAAs) and wants to move forward with incorporating source control measures.

They are looking to gather GSI information from the programs and may use Contra Costa County as a case study. A subset of the proposals will be funded. The permittees are providing \$100k/year under MRP 3.0 for CECs and want assurance that those dollars will go toward meeting permit requirements. Lisa W. will reach out to Melissa Foley to present at Mon Com and give an RMP update. Lisa W. and Lisa A. will send any comments on the SPLWG proposals to Lisa Sabin the week of May 16.

- **Monsanto Cost Estimate.** Lisa W. reviewed the approach to develop an estimated cost for the permittees to achieve the PCBs TMDL by 2050. To develop the estimate, Geosyntec considered the cost to the permittees for seven source control measures for reducing PCBs and mercury. The most significant cost to the permittees is GSI implementation and was estimated based on the number and type of projects listed in the permittees' GI Plans. After considering GSI, the remaining costs to each permittee were apportioned by population and old industrial area.

The cost for the permittees to achieve the PCBs TMDL by 2050 is an estimate based on available information. The committee discussed how:

- the GSI plans have less significance under MRP 3.0;
- the replacement of HDS units is probably not considered in Geosyntec's life-cycle cost;
- GSI implementation has other benefits than just treating PCBs (e.g., treats multiple pollutants);
- GSI is one of the most costly PCBs control measures;
- Implementation of some control measures depends on having existing infrastructure (e.g., storm drains and inlets);
- Another way to consider the Monsanto payout is what can be accomplished with the funds provided and Geosyntec estimated the cost/g of PCBs reduced.

May meeting topics – Trash Monitoring Catchment Delineation and Outfall Selection Update and CCCWP Brochures – were moved to June Mon Com.

- **Next Steps / Action Items**

- Review Meeting Topics and add a line for discussion(s) for other C.11/C.12. requirements.
- Brian L. to review the RWB schedule for the methylmercury TMDL.
- Lisa A. to draft slide deck for a 3-min comment on C.11/C.12. Mon Com will review and provide feedback EOD so Lisa A. can send the slides to Keith.
- Lisa W. to ask Melissa Foley (SFEI) to present at Mon Com to provide an RMP update/summary.
- Lisa A. and Lisa W. to send comments on the SPLWG special studies to Lisa S. before the SPLWG meeting on May 23 and 25.

- **Adjournment.** The meeting was adjourned at 12:00 pm.

Next Scheduled Monitoring Committee Meeting: Monday, June 13, 2022, 10:00 AM- 12:00 noon, Zoom meeting.

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Municipal Operations Committee (MOC) Meeting Minutes May 17, 2022

MUNICIPALITY	ATTENDED [via Web/Phone]
VOTING	
City of Antioch	<i>Phil Hoffmeister, Jeff Cook</i>
City of Brentwood	<i>Melissa Barcelona</i>
City of Concord	<i>Jesse Crawford</i>
Contra Costa County	<i>Beth Baldwin, Michelle Giolli (Vice Chair)</i>
Town of Danville	<i>Bob Russell</i>
City of El Cerrito	<i>Stephen Prée</i>
City of Martinez	
City of Pittsburg	<i>Joseph Camaddo (Chair)</i>
City of Richmond	<i>Terri Mason</i>
City of San Pablo	<i>Amanda Booth</i>
City of Walnut Creek	<i>Lucile Paquette</i>
NON-VOTING	
PROGRAM STAFF and CONSULTANTS	
Staff Augmentation	<i>Elizabeth Yin</i>
Staff Augmentation	
Staff Augmentation	
Program Staff	<i>Karin Graves</i>
Program Staff	
GUESTS	

- 1. Introductions/Announcements:** Joe Camaddo (City of Pittsburg) welcomed the group to the Zoom call and asked for announcements. No announcements were made.
- 2. Approval of Minutes:** Antioch made a motion to approve the April 19, 2022 Meeting Summary. Pittsburg seconded the motion. No objections were raised. The Committee voted to approve the April 19, 2022 Meeting Summary.
- 3. Program Update:** Elizabeth provided an update on several ongoing efforts by Program Staff.
 - MRP 3.0 Adoption Hearing.** Elizabeth Yin (Program Staff, consultant) provided a review of the SF Regional Water Board meeting to adopt MRP 3.0, which was held on May 11, 2022. Elizabeth's review covered the adoption hearing proceedings as well as the changes to MRP 3.0 that were adopted along with the Permit. Overall, MRP 3.0 Revised Tentative Order was adopted, including two errata packets and one supplemental document released by the SF Regional Water Board prior to the adoption hearing.
 - Changes made during the hearing:
 - Correction of unincorporated CC population in attachment H (C.3.j)

2. Exemption of paving dirt or gravel road shoulders when the footprint is not expanded from LID stormwater treatment (C.3.c.i.(2)(c) & C.3.d)
3. (Not in the permit) Direction to staff to bring a progress update on road reconstruction, monitoring, trash implementation challenges and progress.
4. Moving road maintenance projects to the road reconstruction category, or implementing the second option in Jill's presentation

(5) Road Maintenance and Reconstruction Projects

Road projects that involve the maintenance and/or reconstruction of existing streets or roads,¹² which create and/or replace greater than or equal to one contiguous⁸ acre of impervious surface, and that are public road projects and/or fall under the building and planning authority of a Permittee, including sidewalks and bicycle lanes that are built or rebuilt as part of the existing streets or roads. This Regulated Project category includes-excludes utility trenching projects.

5. Adding a preamble which sets a deadline of no later than August 2023 for permittees to come back to the Board to review progress and feasibility for the following items: roads and the impacts of the new requirements, monitoring costs, housing costs associated with Special Projects category C, and workgroup discussions regarding media filtration products as a means to meet C.3 requirements
6. C.18 language affecting San Mateo County permittees was modified to align with the TMDL language
7. C.14 There was some discussion but the language had already been removed in one of the erratas so no action was required.

ii. The Committee also discussed:

1. C4/C5 requirements. How do we need to address the new requirements? Will central san be handling some of the SIC/NAIC code language changes, and how might MRP 3.0 impact inspection issues. The Aug/sept meetings will need to incorporate some discussion of the new requirements
2. C.10 Trash Load Reduction updates.
 - a. Concerns were raised regarding the need for an ad hoc trash group to continue to discuss updates required for trash requirements in MRP 3.0. The Committee discussed whether or not there was a need for the revival of an ad hoc trash group that would discuss Permittee and Program needs related to trash, such as coordinating updates for trash load reduction plans, as well as new and other approaches for addressing reductions from moderate and/or high private lands such as commercial properties. Support was expressed from multiple Permittees who were interested in participating in such a process.
 - b. Additional concerns were discussed related to trash including: trash impracticability report, its development and content; Technical issues surrounding the need to visually demonstrate progress, e.g. turning areas green on trash load reduction maps; developing unified ideas for the County in order to be prepared for participation in more regional efforts, such as participation in BAMSC; challenges associated with expansion in private lands.

- c. Several Permittees expressed that they would likely fall below the 90% threshold due to the changes in MRP 3.0 to Source Control.
 - d. Contra Costa County mentioned that they were developing a protocol for assessing private land areas that are marked as low, and will be willing to share with the group.
 - 3. Discussion of what the Program and its Permittees can do in order to assist the Permittees with identifying next steps and preparing for the upcoming deadlines.
 - a. Elizabeth suggested that instead of a new trash ad hoc group, that the Muni Ops committee is already concerned with trash and suggested for this committee to retain a standing item on the agenda to discuss issues related to Trash. Committee was in support of this change.
 - b. The Program will add a standing agenda item onto MOC agenda for Trash, with critical topics to be discussed and prepared for ahead of the meeting.
 - c. Program staff need to identify what permittee needs are, concerns are concentrated around PLDAs, loss of source controls, trash FCD impracticability. Program staff will work to develop a list of Permittee needs and concerns – what Permittees need help and where? Program staff will also develop a schedule for Permittee deadlines, with C.10 deadlines to be started first such that MOC can prepare for any adjustments.
 - d. Program staff will Prepare a C.10 presentation and timeline for June MOC meeting on Key C4/C10 issues, schedule for compliance, and deadlines.
 - e. Contra Costa is developing and may present a visual tool that could be useful and demonstrated to other permittees – plan an agenda item around a presentation in June or July MOC meeting.
 - **Illegal Dumping Conference (April 19-21)**
 - i. Elizabeth to send out the information for the illegal dumping conference, including notes from the first two days as well as link to the conference recordings online.
 - **EPA Trash Free Waters Webinar**
 - i. Elizabeth will send out information to register for the upcoming EPA Trash Free Waters Webinar on May 26th.
 - **Annual Report Schedule**
 - i. Elizabeth presented the first draft of the Annual report schedule. Overall, the annual report schedule is expected to be similar to last year. Draft Annual Report Forms have been accepted by the Regional Water Board and will be presented at the June 2022 Management Committee meeting. Additional details on developing and submitting Annual Report information will be presented in June.
- 4. **Stormwater Inspector Training:** Elizabeth gave a brief update on the Stormwater Inspector training, which will be held in June. Topics for the training include: MRP 3.0 update, a presentation on enforcement from the County DA's office, notes from the field, and strategies and best practices for cleaning up trash from encampments.
- 5. **Old/New Business:**

- There were no old or new items discussed.

6. **Adjournment:** Chair Joe Camaddo adjourned at 11:00 AM.

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Meeting Summary (Approved)

Development Committee

May 25, 2022

1:30 – 3:30

Voting Members:

Municipality

City of Antioch
City of Brentwood
City of Clayton
City of Concord
Contra Costa County
Town of Danville
City of Lafayette
Town of Moraga
City of Pittsburg
City of Pleasant Hill
City of San Ramon
City of Walnut Creek

Attending

Phil Hoffmeister
Aman Grewal

Mitra Abkenari
Michelle Giolli
Bob Russell
Matt Luttrupp
Frank Kennedy
Jolan Longway (Chair)
Frank Kennedy
Rod Wui
Joel Camacho, Lucile Paquette

Absent

Laura Hoffmeister

Program Staff/Consultants

Mitch Avalon	Consultant
Dan Cloak	Consultant
Alina Constantinescu	Consultant
Yvana Hrovat	Consultant

Guests

Amanda Booth	City of San Pablo
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Introductions, Announcements, and Changes to Agenda

The meeting was held via Zoom. There were no announcements and no changes to the agenda.

Approve Previous Meeting Summaries

On a motion by Frank Kennedy (Moraga), seconded by Phil Hoffmeister (Antioch), the summary of the April 27, 2022, meeting was accepted.

Municipal Regional Permit 3.0

The permit was adopted at the May 11, 2022 [hearing](#), with minor revisions proposed by the Board members in the final minutes of the hearing.

Dan Cloak shared a spreadsheet with a summary of changes impacting C.3 implementation in the new permit (attached to these minutes). Some of the most important changes are that single family homes >10,000 sqft are now considered regulated projects, as are road maintenance projects >1 acre (contiguous). Thresholds for several types of regulated projects were also lowered from 10,000 sqft in MRP 2.0 to 5,000 sqft in MRP 3.0. The C.3 changes will be effective July 1, 2023.

Another issue of concern for the committee is the MRP 3.0 Provision C.3.j and Attachment H requirement for municipalities to retrofit a certain number of acres (varying based on population) during the upcoming permit term. A suggestion was made for agencies to inventory planned retrofit projects to see where everyone stands relative to Attachment H requirements.

Attendees discussed next steps for the committee, including:

- Producing staff memorandum on MRP 3.0 changes and most pressing upcoming tasks for permittees. Dan will present at upcoming Management Committee meeting.
- Training/ outreach materials for agencies: MRP 3.0 changes
- Updating agencies' internal procedures, forms, etc., to regulate lower-threshold projects
- Capturing updated requirements in the *Stormwater C.3 Guidebook*, 8th Edition

AGOL Workgroup

The Program has initiated an AGOL Workgroup to address updates to the AGOL platform. The workgroup produced a final report with recommendations for Management; working on some short-term updates and budgeting for the more significant updates.

Report on C.3 Annual Training

The training took place on May 24. Because of COVID-19 concerns, it was changed to a virtual session. Over 130+ people were in attendance. Staff will develop a more thorough report once feedback from the attendees survey is compiled. Materials will be posted to the CCCWP [website](#).

***Stormwater C.3 Guidebook*, 8th Edition**

Dan provided a general update on the status of the project to date. Because the MRP hearing and the preparation for the Annual Training no substantial update to the Guidebook were developed this past month. The 8th Edition will be released sometime in the Fall.

Open Discussion of C.3 and C.6 Implementation Issues

There was a question on the hydromodification applicability map – this map is not usable, yet, as it was never formally approved by the Regional Water Board. Project applicants are responsible to demonstrate to municipality that hydromodification requirements are satisfied.

Next Meeting Date

Wednesday, June 22nd, 2022 (1:30p-3:30p)

Action Items

None.

Adjournment

The meeting was adjourned at 3:25 PM.

NEXT DEVELOPMENT COMMITTEE MEETING:

Wednesday, June 22nd, 2022

1:30 PM – 3:30 PM

Via videoconference

Attachments to 5/25/2022, Meeting Summary

- Comparison table of MRP 2.0 and Revised TO for MRP 3.0 C.3.b provisions (updated 5/18/22)



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Date: July 20, 2022

To: Management Committee

From: Karin Graves, Acting Program Manager

Subject: Strategic Staffing Plan for the Contra Costa Clean Water Program (CCCWP)

Recommendation:

Accept the Strategic Staffing Plan for the CCCWP, provide any comments and direction to staff, and approve the adjustments to the staffing budget line items described in this report.

Background:

During the months of April and May 2022, the Program interviewed six applicants for the position of Watershed Management Planning Specialist (WMPS) and selected four for final consideration. Out of the four, only one is joining the CCCWP. The new WMPS, Erin Lennon, started work on June 20 and will take over some of the duties currently handled by staff augmentation over an appropriate transition period. This additional staff person will still not bring the Program up to full staffing and it would be prudent to develop a strategic staffing plan to ensure there is no disruption to service delivery.

The following factors will be covered in this staffing plan:

- Going into FY 22/23, the Program will still have a vacancy of one watershed planner position, requiring a continuation of some staff augmentation from consultants.
- At the end of December 2022, Mitch Avalon with Watershed Resources Consulting will be retiring, resulting in some needed staffing adjustments.
- The Program Manager position is still vacant.
- Staffing coverage for each committee, whether with Program staff or augmentation staff.

- Arc GIS Online (AGOL) Staff support.

Program Manager Position

The Program Manager is still out. The current Senior Watershed Management Planning Specialist (SWMPS) has been acting in this position since January 2021. The County is able to continue the temporary upgrade of the SWMPS until the absence is resolved.

The supervisory structure has also changed, as the SWMPS has been acting as the Program Manager leaving some SWMPS duties allocated to others. Supervision of all staff and augmented staff, and oversight of larger consultant contracts, has fallen under the Acting Program Manager. Prior to the current staffing situation, the two WMPS were supervised by the SWMPS, and consultant contract oversight was split between the WMPS and SWMPS positions. Over the past two years staff have come up with a consistent approach to covering these additional supervisory tasks assumed by the Acting Program Manager by passing some of the tasks, like budget oversight, to augmented staff.

Watershed Management Planning Specialist Positions

The new WMPS will transition into the role of covering the Development and Municipal Operations Committees and the permit provisions covered by these committees. Like previous WMPS staff, they will also provide oversight of the consultant contracts for work relative to those committees. They will also attend related BAMSC Sub-Committee meetings.

Lisa Welsh and Lisa Austin of Geosyntec Consultants will continue to oversee the Monitoring Committee and related monitoring contracts, attend related BAMSC Sub-Committees, and Regional Monitoring Program committees. Lisa W. and Lisa A. work a combined total of 20 hours a week on this committee and are slated to assist the CCCWP with other project specific permit requirements in FY 22/23. Due to the robust number of projects they are working on, they are currently unable to cover another Committee. For this reason, Hilary Pierce with LWA will continue to oversee the Public Information and Participation (PIP) Committee.

In terms of hiring the second WMPS, the CCCWP will wait the recommended 6 months before readvertising in order to receive a fresh pool of applicants. With that in mind, staff expect to readvertise in January 2023, and hope to fill the position by July of 2023.

Senior Watershed Management Planning Specialist Position

Mitch Avalon has been filling in for many of the duties of this position since August 2019 and will be retiring in December 2022. While this position is a 40 hour a week position, he works an average of 25 - 30 hours a week. Thus, some of the SWMPS workload, such as staff supervision, was shifted to the Acting Program

Manager. As described above, staff have found a consistent approach to covering the tasks of the SWMPS and the Acting Program Manager and recommend maintaining a similar division of duties for the SWMPS in FY 22/23. Liz Yin and Hilary Pierce of Larry Walker and Associates have been selected to provide staff augmentation for the SWMPS duties when Mitch retires. In order to provide more consistent coverage, Liz will serve as the primary augmented staff, and Hilary will be cross trained and provide backup support to Liz as needed. This model was utilized with Lisa Welsh and Lisa Austin's oversight of the Monitoring Committee and has proved to be an efficient and comprehensive way to provide staff support. Starting in October Mitch will begin working with Liz and Hilary to transition his workload over to them. They are expected to work a combined average of 24 hours a week starting in January 2023.

Contingency Planning and Cross Training

Staff recommend having primary and secondary consultant contracts for technical work and for staff augmentation work where possible. For most service areas outlined in a recent request for qualifications, the CCCWP entered into contracts with two or more firms to complete the work. The CCCWP also has staff augmentation contracts with Haley and Aldrich, Watershed Resources Consulting (Mitch Avalon), Larry Walker and Associates, and Geosyntec Consultants. They are all three-year contracts that end in 2023, and staff recommend they be extended two years to 2025. This will allow the CCCWP to have the ability to utilize consultant services as much as needed. As described above with the SWMPS and WMPS duties, staff suggest staffing committees with two consultants where possible (primary and a secondary). Senior consultant staff can then delegate tasks to the less senior consultant staff, resulting in cost savings, providing more comprehensive coverage throughout the year, and spreading out the institutional knowledge between employees and providing backup for any sudden staff changes.

Long Range Planning

Recommendations for program structure options were outlined in the Organizational Structure Report to the Management Committee on February 17, 2021, by Mitch Avalon with support from the Select Committee. The report noted that the CCCWP was by default operating with a heavy consultant model, i.e., staff positions are filled by both permanent County staff and consultants. Staff recommend maintaining the current staff augmentation structure that has been used over the last two years. When positions are open, staff will initiate the process to hire and fill those positions with permanent County staff. While the CCCWP has been staffed with more consultants in the last two years than in previous years, the current model has proven to offer flexibility and a wide breadth of options for both technical and staff augmentation support. MRP 3.0 includes a significant increase in permit requirements for both permittees and the CCCWP, and determining the resource needs to meet these requirements will be an

evolutionary process in FY 22/23. Staff have worked closely with consultants to assure there will be sufficient support to meet these new requirements. For additional information on consultant support see the attached updated organizational chart, which describes staff and technical support leads for each committee.

Liz Yin of Larry Walker and Associates recently completed an AGOL Assessment which took a comprehensive look at the CCCWP and permittee's AGOL needs. One of the recommendations in the report was for the CCCWP to identify staff or consultants to provide AGOL support to permittees, draft a RFQ for AGOL contract services, and oversee and maintain an ad hoc AGOL committee. Liz Yin was selected by staff to provide this AGOL support in FY 22/23. The cost estimate for this support is \$35,000 and is included in the cost breakdown in the attached CCCWP Administrative Costs worksheet. The CCCWP Administrative Costs document is further described below in the Fiscal Impact section of this report.

CCCWP staff are working on creating a comprehensive list of Program and Permittee requirements and deliverables for MRP 3.0 that is expected to be completed by the July 2022 Management Committee meeting. This list of requirements will help inform the level of effort needed and whether our current staffing structure provides enough support to meet permit requirements. In January staff will assess resources versus service needs and deliverables, and if an adjustment is needed will provide an update to the Management Committee at that time.

Fiscal Impact:

Staff prepared an administrative costs analysis which highlights the cost difference between staffed fully with county employees and staffed with three full time employees, a part time clerical (20 hours a week) and the balance with augmented staff (attached). The costs include the costs for:

- Karin Graves to continue in the Acting Program Manager role up to the end of FY 22/23 or as long as needed
- Mitch Avalon to continue with some of the SWMPS duties until the end of December 2022
- Geosyntec to provide Monitoring Committee Support
- Larry Walker and Associates to provide transitional support to the Development and Municipal Operations committees while these committees transition to the new WMPS
- Larry Walker and Associates to transition into providing the SWMPS duties between October and December when they will fully take over these duties (includes costs of Annual Report oversight)
- Larry Walker and Associates to continue providing PIP Committee support

- Larry Walker and Associates to provide AGOL staff support

These costs estimates were prepared using average hours spent on committee work by augmented staff over the last two years. They also take into account the current staffing and hiring constraints. Staffing costs are different for several reasons:

- The cost estimates include transition periods with consultants of two to three months for training the new WMPS to cover the Development and Municipal Operations Committees. They also include continued support of the PIP Committee since only one WMPS was hired. Budget Row 4 (On Call Staff Augmentation) was increased from \$100,000 to \$138,000 to cover the cost of LWA providing this support.
- The original FY 22/23 budget included staff augmentation for Watershed Resources Consulting to cover the SWMPS duties for 6 months. Budget Row 4a (Staff Augmentation (LWA for 6 months plus transition)) was added and includes \$223,000 to cover an additional 6 months of staff augmentation of the SWMPS duties by LWA.
- The original budget assumed that two WMPS would be hired. Since only one was hired, Geosyntec will continue to provide staff augmentation for the Monitoring Committee. Row 4b (Staff Augmentation (Geosyntec)) was added and includes \$270,478 to cover 12 months of support.
- Budget rows 107 and 108 were added to include salary savings for the WMPS and SWMPS position.
- County staff costs include an estimated cost of living adjustment of 5%.
- Consultant costs go up by 3% each year to account for inflation.
- Hourly rates for consultants working as augmented staff include expected salary promotions that will go into effect by July 2022.
- There is a cost buffer for staff augmentation line items. Staff augmentation totals do not account for vacations and both Geosyntec and Larry Walker and Associates have consistently charged less than the totals for staff augmentation line items.
- The AGOL staff support is an extra part time position that is in addition to the current county staffing model.
- While the County offers attractive benefit packages, the annual pay rate is generally lower than other Bay Area public and private sector employers.

On July 7, 2022 the Administrative Committee discussed this staffing plan and asked when the Program Manager vacancy will be resolved, as this information is needed to do long range planning. Staff will be providing an update during the Management Committee meeting. After some discussion, the Administrative

Committee supported the staffing plan presented by staff. If this staffing plan is approved by the Management Committee, the increase in costs to maintain a mix of county and augmented staff in FY 22/23 will be included in a budget adjustment to be considered and approved at the August 17, 2022 Management Committee meeting.

Attachments:

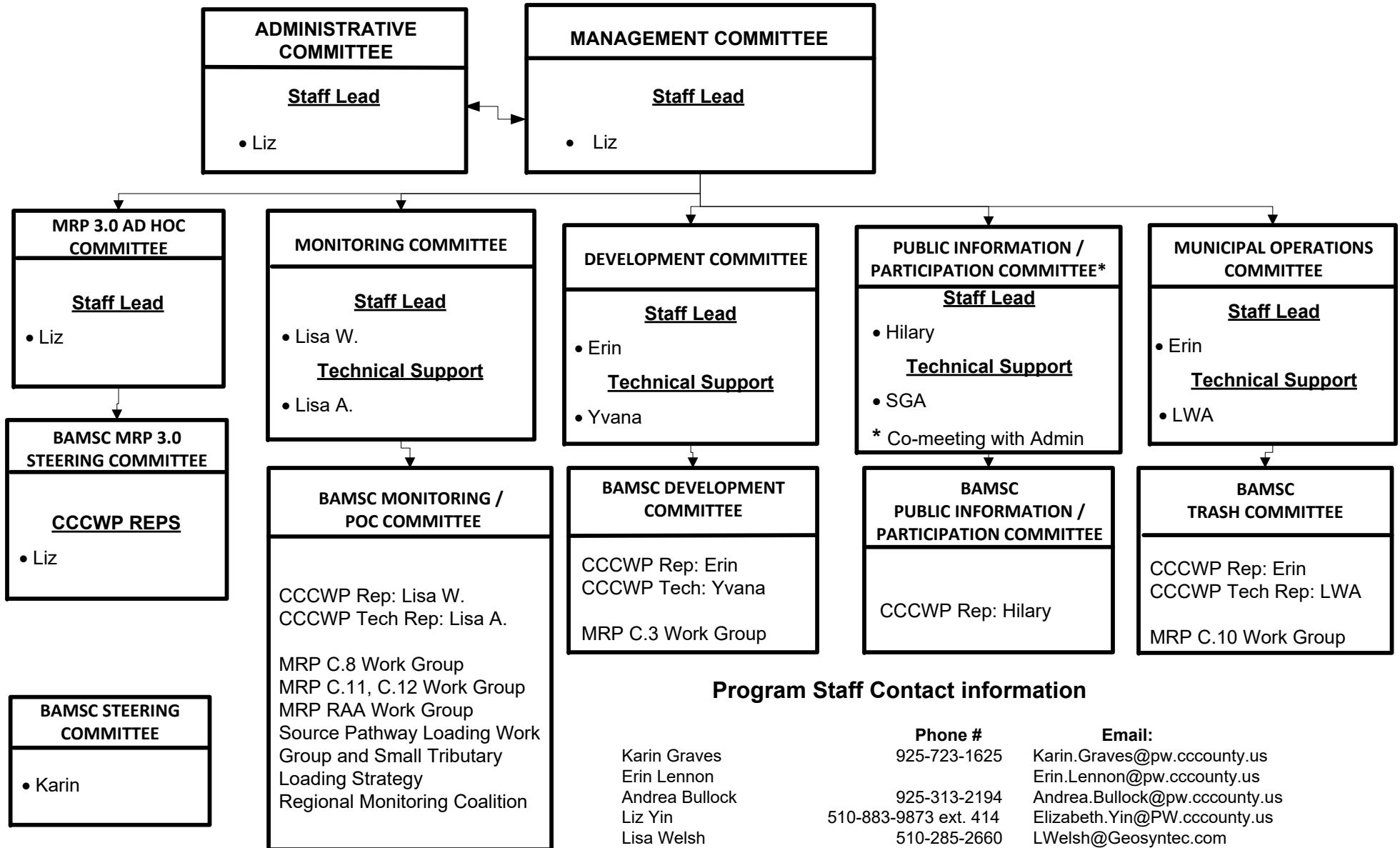
CCCWP Organization Structure FY 22/23

CCCWP Administrative Costs Comparison FY 22/23

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CONTRA COSTA CLEAN WATER PROGRAM INTERIM COMMITTEE LEADS

Fiscal Year 2022-2023



Program Staff Contact information

	Phone #	Email:
Karin Graves	925-723-1625	Karin.Graves@pw.cccounty.us
Erin Lennon		Erin.Lennon@pw.cccounty.us
Andrea Bullock	925-313-2194	Andrea.Bullock@pw.cccounty.us
Liz Yin	510-883-9873 ext. 414	Elizabeth.Yin@PW.cccounty.us
Lisa Welsh	510-285-2660	LWelsh@Geosyntec.com
Yvana Hrovat	805-252-9028	yhrovat@haleyaldrich.com
Lisa Austin	510-285-2757	LAustin@Geosyntec.com
Hilary Pierce	510-753-6500 ext. 219	hilaryp@lwa.com
Michael Burger	925-313-2360	Michael.Burger@pw.cccounty.us

CCCWP 6 FTE -12 Months								
	Step	Monthly Salary	# of Months	Benefits @ 74.9%	Division Overhead (\$60K flat amount)	Department Overhead @ 27%	Outside Rate @ 2%	Total
FY 22/23 Approved Positions + 5% COLA								
Stormwater Program Manager	5	\$12,745	12	\$114,555	\$10,000	\$41,294.79	\$3,058.87	\$321,852
Senior Watershed Mgt Planning Specialist	5	\$10,494	12	\$94,319	\$10,000	\$34,000.05	\$2,518.52	\$266,763
Watershed Management Planning Specialist	5	\$8,299	12	\$74,591	\$10,000	\$26,888.54	\$1,991.74	\$213,058
Watershed Management Planning Specialist	5	\$8,299	12	\$74,591	\$10,000	\$26,888.54	\$1,991.74	\$213,058
Administrative Services Assistant III	5	\$8,694	12	\$78,144	\$10,000	\$28,169.41	\$2,086.62	\$222,731
Clerk-Senior Level	7	\$5,040	12	\$45,297	\$10,000	\$16,328.80	\$1,209.54	\$133,313
TOTALS				\$481,496	\$60,000	\$173,570	\$12,857	\$1,370,776

CCCWP 6 FTE -12 Months								
	Step	Monthly Salary	# of Months	Benefits @ 74.9%	Division Overhead (\$60K flat amount)	Department Overhead @ 27%	Outside Rate @ 2%	Total
FY 22/23 Approved Positions + 5% COLA								
Stormwater Program Manager	5	\$12,745	12	\$114,555	\$10,000	\$41,294.79	\$3,058.87	\$321,852
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Watershed Management Planning Specialist	5	\$8,299	12	\$74,591	\$10,000	\$26,888.54	\$1,991.74	\$213,058
Administrative Services Assistant III	5	\$8,694	12	\$78,144	\$10,000	\$28,169.41	\$2,086.62	\$222,731
Clerk-Senior Level (20 hours/week)	7	\$5,040	12	\$45,297	\$10,000	\$16,328.80	\$1,209.54	\$66,656
TOTALS				\$481,496	\$60,000	\$173,570	\$12,857	\$1,304,120

CCCWP 4 FTE+Staff Augmentation									
	Step	Monthly Salary	# of Months	Benefits @ 74.9%	Division Overhead (\$60K flat amount)	Department Overhead @ 27%	Outside Rate @ 2%	Total	Notes
FY 22/23 Approved Positions + 5% COLA									
Stormwater Program Manager (TU)	5	\$12,745	12	\$114,555	\$10,000	\$41,294.79	\$3,058.87	\$321,852	Karin Graves as Acting Program Manager
Senior Watershed Mgt Planning Specialist	5	\$10,494	0	\$0	\$0	\$0.00	\$0.00	\$0	
Watershed Management Planning Specialist	5	\$8,299	0	\$0	\$0	\$0.00	\$0.00	\$0	
Watershed Management Planning Specialist	5	\$8,299	12	\$74,591	\$10,000	\$26,888.54	\$1,991.74	\$213,058	
Administrative Services Assistant III	5	\$8,694	12	\$78,144	\$10,000	\$28,169.41	\$2,086.62	\$222,731	
Clerk-Senior Level	7	\$5,040	12	\$45,297	\$10,000	\$16,328.80	\$1,209.54	\$66,656	20 hrs/wk
<i>Subtotal Staff Costs</i>								<i>\$824,298</i>	
Sr. Watershed Mgt Planning Specialist Support			6					\$109,200	Watershed Resources Consulting Sr. WMPS position support 30 hrs/wk
Sr. Watershed Mgt Planning Specialist Support			9					\$223,000	Larry Walker and Associates Sr. WMPS position support 6 hrs/wk for 3 months and 24 hrs/wk for 6 months
Public Information and Participation Support			12					\$79,000	Larry Walker and Associates 10 hrs/wk
Municipal Operations Committee Transitional Support			12					\$36,000	New staff on boarding support at 10 hrs/wk for 2 months and transition to 2 hrs/wk support as needed during the FY
Development Committee Transitional Support			12					\$23,000	New staff on boarding support at 10 hrs/wk for 2 months and transition to 2 hrs/wk support as needed during the FY
AGOL Support Staff			12					\$35,000	Larry Walker and Associates AGOL Staff Support 3 hrs/wk
Monitoring Committee Support			12					\$270,478	Geosyntec Consultants 20 hrs/wk
<i>Subtotal Consultant Costs</i>								<i>\$775,678</i>	
TOTAL				\$312,587	\$40,000	\$112,682	\$8,347	\$1,599,976	
OVERAGE								(\$229,200)	



Date: July 20, 2022

To: Management Committee

From: Mitch Avalon, Consultant

Subject: FY 22/23 Draft Budget Adjustment

Recommendation:

Accept report from staff on the FY 22/23 draft budget adjustment, and provide staff with any comments or direction.

Background:

The Management Committee approved the FY 22/23 budget at its March 16, 2022 meeting. There are three primary drivers since the budget was adopted that require consideration of a budget adjustment: staffing changes, modified advance work schedules, and changes due to MRP 3.0.

Staffing Changes. A detailed description of the staffing changes and costs is included in the staff report for the Strategic Staffing Plan in the Committee packet. Briefly, the staffing changes that require a budget modification include the following:

- Only one watershed planner position was filled, leaving one vacant position
- Providing support to the new watershed planner during a transition period
- Transitioning staff augmentation to replace Mitch Avalon
- Continue staff augmentation support to Monitoring and PIP committees
- Continue Watershed Resources Consulting support through December
- Provide AGOL support with augmented staff

When the budget was developed, the intent was to fill two vacant watershed planner (Watershed Management Planning Specialist) positions in the Program, but only one was hired. This triggers the need to continue some staff augmentation and to provide support during the transition and learning period for the new watershed planner. In addition, Mitch Avalon with Watershed Resources Consulting will be retiring at the end of December and additional staff augmentation transitioning is needed to cover his work going into 2023.

Advanced Work Schedules. About a year ago, during negotiations for MRP 3.0, Regional Water Board staff were drafting some requirements with schedules that would require work in FY 21/22 in advance of the permit's effective date of July 1, 2022. In response, the Program developed a budget for advanced work to be completed in FY 21/22, which was approved by the Management Committee on December 15, 2021. However, when the permit was finally adopted, many of the schedules were pushed back and there was no need to complete all the advance work budgeted for FY 21/22. Part of the budget adjustment is determining the uncompleted advance work from FY 21/22 and adding it into FY 22/23. The draft adjusted budget includes a separate column identifying the unspent budget in FY 21/22 for each advance work item.

MRP 3.0 Changes. There were a few changes to the permit when it was adopted that require budget adjustments. The most notable was inclusion of receiving water limitations monitoring into the permit which requires a new budget line item for \$30,000 in the C.8 Monitoring section. The other changes resulted in relatively minor adjustments. The schedule for the Comprehensive Bio-assessment Final Report was changed from March 2023 to March 2024, so that budget item was not needed in FY 22/23. However, there will be \$20,000 needed to complete the creek status monitoring work in FY 22/23 (close out work from MRP 2.0), and those costs will be covered by the budget for the Comprehensive Bio-assessment Final Report (\$15,000) and a minor budget reduction of the Urban Creeks Monitoring Report (\$5,000).

All adjusted budget line items are highlighted in yellow in the attached spreadsheet. Unlike the budget adjustment last year, this one covers the entire fiscal year and will not need to be adjusted again in December, unless something unforeseen arises. Staff proposes to have the draft budget adjustment reviewed by the Administrative Committee and Management Committee in July, with approval of the final budget adjustment in August.

Administrative Committee Meeting:

The Administrative Committee considered the draft adjusted budget and requested staff provide an update on the Program Manager position, which was added to the Management Committee agenda. The Committee also questioned whether 20 hours per week is enough time to complete all the work required of the Monitoring Committee, but staff pointed out that 20 hours was an average over the course of the year, providing flexibility to ramp up when busy and ramp down during slow periods. There was also a request to clarify two budget items in section C.12 regarding PCBs in building demolition materials to ensure the

work is not double counted. One item, Annual Progress Report on Controlling PCBs, is the report prepared every year on all the control measures used to meet PCBs load reduction requirements, including the annual PCBs in building demolition materials report. This year, the budget item also includes a one-time cost to modify the annual report form to reflect MRP 3.0 requirements. The other item, Guidance on MRP 3.0 Building Demolition Requirements, is for developing a one-time guidance document for use by permittees to modify their building demolition program so it meets the new MRP 3.0 requirements and gathers the correct data. There is no double counting. The last question was whether the adjusted budget would be the right time to reduce budget line items. Staff suggested a better time would be during the budget process for FY 23/24. That will begin in November and by then there will be a better understanding of the MRP 3.0 requirements, the resources needed to meet those requirements, the plans needed to implement the requirements (e.g. PCBs control measure plan), and the conditionally approved budget items. The Administrative Committee supports adjusting the FY 22/23 adopted budget.

Finally, staff recommends, for administrative purposes, to include a \$20,000 budget line item for Monitoring Management Support in section C.8. This item will be funded from a \$10,000 reduction in the Trash Monitoring budget line item and a \$10,000 reduction in the Source Properties Investigations budget line item. This addition results in no change to the total budget amount.

Fiscal Impact:

Approval of the adjusted budget increases the adopted FY 22/23 budget by \$239,063, of which \$125,000 is advance work that is being "carried over" from FY 21/22.

Attachments:

FY 22/23 Draft Adjusted Budget

Contra Costa Clean Water Program
FY 2022-23 Group Program Budget- Adopted
Adjusted August 17, 2022 (DRAFT)

Budget Row	WO#	Description/Expenditure	ADOPTED Adj FY 2021/22 Dec 15, 2021 ¹	FY 21/22 Advance Work ²	Adopted FY 22/23 Mar 16, 2022	FY 22-23 Conditional Budget Items ³	Unspent Advance Work	Adjusted FY 2022-23 August 2022 (DRAFT)	FY 2022/23 Notes
1		Administrative/Personnel (See Admin Worksheet)			\$1,575,009			\$2,064,798	
2	7608	Staff Salaries and Benefits + County Overhead			\$1,345,809			\$1,304,120	5% COLA increase; Reduced Clerk to 20hrs/wk
3	7609	Staff Augmentation (Watershed Resources Consulting for 6 months)			\$109,200	\$109,200		\$109,200	Assumes PM position vacancy, SWMPS Support
4	7609	On-Call Staff Augmentation (as needed) (LWA, GC, H&A)			\$100,000	\$100,000		\$138,000	MOC and DC transition support + PIP Support (LWA)
4a	7609	Staff Augmentation (LWA for 6 months plus transition)			\$0			\$223,000	Assumes PM position vacancy, SWMPS support
4b	7609	Staff Augmentation (Geosyntec)			\$0			\$270,478	MonCom staff support
5	7608	Staff Training and Conferences			\$10,000			\$10,000	
6	7612	Non-Program County Staff Labor			\$10,000			\$10,000	
7		General Supplies & Equipment			\$7,788			\$7,788	
8	7605	Misc. Office Equipment/Supplies not covered by County Overhead			\$6,600			\$5,640	
8a	7605	Zoom annual fee						\$960	trainings/training recordings/subcommittee meetings
9	7605	Groupsite Annual Fee			\$1,188			\$1,188	
10		Association/Memberships/License Fees			\$33,554			\$33,554	
11	7611	ESRI (AGOL Annual License Fee)			\$10,000			\$10,000	
12	7611	California Stormwater Quality Association (CASQA)			\$23,554			\$23,554	3% annual increase
13		Legal Services			\$95,000			\$95,000	
14	7606	County Counsel and Contract Administration			\$10,000			\$10,000	
15	7610	MRP 3.0 Appeal (Richards, Watson & Gershon)			\$35,000	\$35,000		\$35,000	Will be needed for Baykeeper appeal
16	7610	On-Call Legal Services (Richards, Watson & Gershon)			\$30,000			\$30,000	
17	7613	Alternative Compliance Legal Review (Richards, Watson & Gershon/County Counsel)			\$20,000			\$20,000	
18		Regional Projects/Regional Cooperation			\$230,000			\$230,000	
19	7618	BAMSC			\$30,000			\$30,000	
20	7618	SFEI - RMP			\$180,000			\$180,000	3% increase
21	7618	SFEI - CECs			\$20,000			\$20,000	
22		General Consultant Services/Projects (See Consultant Services/Projects Worksheet)			\$282,000			\$342,000	
23	7616	5-Year MRP 3.0 Budget (LWA/GC)			\$10,000			\$10,000	
24	7609	Financing Plan Strategy for MRP 4.0 (LWA/GC)			\$20,000			\$20,000	
25	7616	MRP 3.0 Compliance Checklist (LWA/GC)			\$10,000			\$10,000	
26	7616	Grant Tracking & Application (LWA/GC)			\$40,000			\$40,000	
27	7616	Alternative Compliance Administrator Set Up (LWA/GC)			\$55,000	\$55,000		\$55,000	
28	7616	Project Management, Technical Review, Regulatory Compliance, etc. (LWA/GC)			\$97,000			\$97,000	
29	7665	GIS/AGOL Maintenance, Minor Upgrades (Psomas)			\$50,000	\$50,000		\$50,000	Conditional approval of minor upgrades only
29a	7665	GIS/AGOL Support Staff (LWA)			\$0			\$35,000	Staff Support 3hrs/wk
29b	7620	Brochures (TBD)			\$0			\$25,000	
30	7654	Municipal Operations (C.2) - Training/Workshop (See MOC Worksheet)			\$3,100	\$3,100		\$3,100	
31		New Development/Redevelopment (C.3) (See Development Committee Worksheet)			\$436,000			\$436,000	
32	7641	Hydromodification Management Modeling, CCCHM and/or BAHM (TBD)			\$100,000	\$100,000		\$100,000	
33	7641	Hydrograph Management Compliance Options Report (H&A)			\$10,000			\$10,000	
34	7641	Hydromodification Management Maps (Psomas)			\$15,000			\$15,000	
35	7641	Hydromodification Management Calculator (TBD)			\$41,000	\$41,000		\$41,000	
36	7641	Green Infrastructure Design Guidelines (H&A)			\$40,000	\$40,000		\$40,000	
37	7641	Peak Flow Control Calculator (TBD)			\$52,000	\$52,000		\$52,000	
38	7645	Update Stormwater C.3 Guidebook (H&A)			\$36,000	\$36,000		\$36,000	
39	7641	BAHM Update (EOA/Clear Creek)			\$25,000			\$25,000	
40	7645	Alternative Compliance Program Implementation (2 Pilot Projects)(LWA/GC)			\$50,000	\$50,000		\$50,000	
41	7645	Frequently Asked Questions			\$5,000			\$5,000	
42	7645	Annual C.3 Training/Workshop (H&A)			\$12,000	\$12,000		\$12,000	

Contra Costa Clean Water Program
FY 2022-23 Group Program Budget- Adopted
Adjusted August 17, 2022 (DRAFT)

Budget Row	WO#	Description/Expenditure		ADOPTED Adj FY 2021/22 Dec 15, 2021 ¹	FY 21/22 Advance Work ²	Adopted FY 22/23 Mar 16, 2022	FY 22-23 Conditional Budget Items ³	Unspent Advance Work	Adjusted FY 2022-23 August 2022 (DRAFT)	FY 2022/23 Notes
43	7645		General Technical Services Support (H&A)(LWA/GC)			\$50,000			\$50,000	3% increase
44	7664	Industrial/Commercial Controls (C.4) - Training/Workshop (See MOC Worksheet)(LWA)				\$3,100			\$3,100	
45	7662	Illicit Discharge/Detection and Elimination (C.5) (See MOC Worksheet)				\$0			\$0	
46	7628	Construction Controls (C.6) (See Development Committee worksheet (LWA)				\$0			\$0	
47		Public Information/Participation (C.7) (See PIP Committee Worksheet)				\$159,300			\$159,300	
48	7617		School-Aged Children Outreach (SGA)			\$9,000			\$9,000	
49	7617		Watershed Stewardship Green Business Program			\$6,000			\$6,000	
50	7617		Public Outreach through Bringing Back the Natives Garden Tour (Kathy Kramer-Sponsor)			\$16,500			\$16,500	
51	7617		Used Oil/Student Outreach /Youth Programs (Matt Bolender)			\$2,000			\$2,000	
52	7617		Outreach Campaign, Public Education, Citizen Involvement (SGA)(Caltrans)			\$70,800			\$70,800	
53	7617		Public Outreach through Website Maintenance and Hosting (WebSight Design)			\$15,000			\$15,000	
54	7617		General Youth/Public Outreach; Media Management (SGA)			\$35,000			\$35,000	3% increase
55	7617		Outreach Contingency			\$5,000			\$5,000	
56		Water Quality Monitoring (C.8) (See Monitoring Committee Worksheet)				\$525,000			\$605,000	
57	7618		LID Monitoring Plan (KEI)(LWA/GC)			\$60,000			\$60,000	
58	7618		Trash Monitoring Plan (LWA/GC)(KEI)		\$75,000	\$30,000		\$40,000	\$70,000	\$55,000 for outfall mapping
59	7618		Trash Monitoring (KEI)(LWA)			\$195,000			\$185,000	moved \$10,000 to Mon Mgmt Support (63c)
60	7618		Pollutants of Concern Monitoring (KEI)(LWA/GC)			\$50,000			\$50,000	Does not include source properties
61	7618		Pesticides and Toxicity Monitoring (KEI)(LWA/GC)			\$70,000			\$70,000	
62	7618		Comprehensive Bio-assessment Final Report WY 2012 – 2021 (KEI)(LWA/GC)			\$15,000				will remove line 62 (\$15K added to line 63b) Work will not be completed in
63	7618		Urban Creeks Monitoring Report (POC, Pesticides and Toxicity, Trash, LID)(KEI)(LWA/GC)			\$95,000			\$90,000	reduced by \$5,000
63a	7618		Creek Status Monitoring Follow-Up			\$0			\$20,000	Bio assessment follow up/lab reporting
63b	7618		POC Receiving Water Monitoring			\$0			\$30,000	needs MC approval
63c	7618		Monitoring Management Support						\$20,000	new item
64	7618		All Monitoring Contingency			\$10,000			\$10,000	Contingency for all monitoring items
65		Pesticide Toxicity Control (C.9) (See MOC Worksheet)				\$81,023			\$81,023	
66	7636		Our Water Our World Local Outreach and Training (Plant Harmony)			\$69,500			\$69,500	
67	7636		Our Water Our World Outreach Materials (Paid to CASQA)			\$5,080			\$5,080	formerly paid through BASMAA
68	7636		Pesticide Regulatory Coordination Program (Paid to CASQA)			\$5,943			\$5,943	formerly paid through BASMAA
69	7636		Outreach to Pest Control Professionals			\$500			\$500	
70		Trash Load Reduction (C.10) (See MOC Worksheet)				\$60,000			\$60,000	
71	7620		Trash Load Reduction Plan (LWA)			\$10,000			\$10,000	
72	7620		Trash Reduction and Impracticability Report (LWA)			\$50,000			\$50,000	
73	7618	Mercury Controls (C.11) (requirements addressed under C.12)				\$0			\$0	
74	7618	PCBs Controls (C.12) (See Monitoring Committee Worksheet)				\$430,914			\$460,914	
75	7618		Old Industrial Area PCBs Control Measure Plan (LWA/GC)		\$30,000	\$10,000		\$30,000	\$40,000	
76	7618		Old Industrial Area PCBs Treatment Project (first project to implement the Plan) (TBD)			\$200,000			\$200,000	project development includes guidance on funding O & M
77	7618		Annual Progress Report on Controlling PCBs (LWA/GC)		\$10,000	\$20,000		\$10,000	\$30,000	bldg demo, \$10,000 for new report format; regional collab/In-kind
78	7618		Source Property Investigation (KEI) (LWA/GC)			\$150,000			\$140,000	moved \$10,000 to Mon Mgmt Support (63c)
79	7618		PCBs in Electrical Utilities (LWA/GC)			\$10,000			\$10,000	
80	7618		Guidance for MRP 3.0 Building Demolition Requirements (LWA/GC)			\$20,000			\$20,000	regional collab/In-kind
81	7618		Provide Fish Risk Flyers/Signs			\$5,305			\$5,305	
82	7618		Distribute Fish Risk Flyers (KEI)			\$10,609			\$10,609	
83	7618		Annual Fish Risk Status Report (KEI)			\$5,000			\$5,000	
84		Exempted and Conditionally Exempted Discharges (C.15) (See PIP Committee Worksheet)				\$15,000			\$15,000	
85	7617		Firefighting Discharges (LWA/GC)			\$15,000			\$15,000	
86		Unsheltered Homeless Discharges (C.17) (See MOC Worksheet)				\$120,000			\$120,000	
87	7616		Homeless Mapping (TBD)			\$20,000	\$20,000		\$20,000	

Contra Costa Clean Water Program
FY 2022-23 Group Program Budget- Adopted
Adjusted August 17, 2022 (DRAFT)

Budget Row	WO#	Description/Expenditure		ADOPTED Adj FY 2021/22 Dec 15, 2021 ¹	FY 21/22 Advance Work ²	Adopted FY 22/23 Mar 16, 2022	FY 22-23 Conditional Budget Items ³	Unspent Advance Work	Adjusted FY 2022-23 August 2022 (DRAFT)	FY 2022/23 Notes
88	7616		BMP Report (TBD)			\$50,000	\$50,000		\$50,000	
89	7616		Implementation Plan (TBD)			\$50,000	\$50,000		\$50,000	
90		East Contra Costa County Projects (C.19) (See Monitoring Committee Worksheet)				\$70,000			\$105,000	
91	7618		Methylmercury Monitoring for Delta TMDL (LWA/GC)			\$20,000			\$20,000	
92	7618		Marsh Creek Dissolved Oxygen Monitoring (LWA/GC)			\$30,000			\$30,000	Includes SSID response to Jan 3, 2022 RB letter
93	7618		Annual Mercury Monitoring Plan (LWA/GC)		\$15,000	\$10,000		\$15,000	\$25,000	
94	7618		Pyrethroid Control Program Baseline Monitoring Report (LWA/GC)			\$5,000			\$5,000	
95	7618		East County TMDL Control Measure Plan (LWA/GC)		\$30,000	\$5,000		\$20,000	\$25,000	
96		Cost Reporting (C.20) (see PIP Committee Worksheet)				\$10,000			\$20,000	
97	7617		Cost Reporting Framework (LWA/GC)		\$15,000	\$10,000		\$10,000	\$20,000	
98		Asset Management (C.21) (see Development Committee Worksheet)				\$30,000			\$30,000	
99	7645		Asset Management Framework (TBD - H&A)			\$30,000			\$30,000	
100			ADVANCE WORK SUBTOTAL		\$175,000			\$125,000		
101			CONDITIONAL BUDGET ITEMS SUBTOTAL				\$803,300			
102			GROUP PROGRAM BUDGET SUBTOTAL	\$4,137,667		\$4,166,788			\$4,871,577	
103	7698		2% CONTINGENCY	\$82,753		\$83,336			\$97,432	
104			TOTAL GROUP ACTIVITIES BUDGET	\$4,220,421		\$4,250,124			\$4,969,008	
105			CONTINGENCY EXPENSE	\$0		\$0			\$0	
106			SALARY CREDIT (PM)(12 Months)	(\$107,782)		\$0			\$0	
107			SALARY SAVINGS (SWMPS 12 months)	\$0		\$0			(\$266,763)	
108			SALARY SAVINGS (WMPS 12 months)	(\$406,802)		\$0			(\$213,058)	
109			SUBTOTAL	(\$514,584)		\$0			(\$479,821)	
110			NET SUBTOTAL GROUP PROGRAM BUDGET	\$3,705,837		\$4,250,124			\$4,489,187	
111			SUA FUNDING CAP	\$3,500,000		\$3,500,000			\$3,500,000	
112			NET TOTAL GROUP PROGRAM BUDGET	\$3,705,837		\$4,250,124			\$4,489,187	
113			SUA FUNDING GAP	(\$205,837)		(\$750,124)			(\$989,187)	

NOTES

¹ Budget totals are shown for the Midyear Adjusted Budget for FY 21/22, but line item budget numbers are not shown as there are significant changes and rearrangement of budget line items in the new FY 22/23 budget.

² Advance work is the work that must be completed prior to July 1, 2022 to meet the permit schedule in the MRP 3.0 Tentative Order.

³ Conditionally approved budget items will require prior discussion to confirm task amount and when to begin work. Amounts will be removed from the conditional column once approved.



CONTRA COSTA
CLEAN WATER
PROGRAM

Date: July 20, 2022

To: Management Committee

From: Mitch Avalon

Subject: Options Report: Filling the "SUA Funding Gap"

Recommendation:

Consider staff's overview of the options available to provide additional funding to permittee stormwater programs and the Clean Water Program, and provide direction to staff to prepare a formal Options Report.

Background:

MRP 1.0, adopted in 2009, dramatically increased permittee compliance costs. Permittees began to look for ways to raise funds to pay for these increased costs. This effort culminated in a ballot measure for a property related fee in 2012. The election of property owners was held, the ballots were tabulated, and the results were about 40% in favor of and about 60% in opposition to the fee. Permittees who had not increased their SUA assessment rate to the maximum did so. MRP 2.0, adopted in 2015, increased compliance costs yet again.

Not too long after the pandemic struck and shelter in place orders were given on March 17, 2020, permittees became interested in reducing the budget. At the June 17, 2020 Management Committee meeting, the charter of the Select Committee was modified to include analysis of the recently adopted FY 20/21 budget, identification of potential budget cuts, and preparation of a Budget Reduction Plan. The Select Committee developed a process to prepare a Budget Reduction Plan but could not reach agreement on specific budget cuts. At the November 18, 2020 Management Committee meeting the Select Committee recommended deferral of the Budget Reduction Plan indefinitely and to discuss and address any desired budget reduction while developing the upcoming FY 21/22 budget. The Management Committee approved this recommendation.

MRP 3.0 was adopted by the Regional Water Board on May 11, 2022 and will result in another increase in compliance costs. The FY 22/23 budget is approximately \$1 million over the \$3.5 million threshold set by the Management Committee to ensure a consistent return to source of Stormwater Utility

Assessment funds. The budget amount over the \$3.5 million threshold is referred to as the "SUA Funding Gap". The budget up to the \$3.5 million threshold is funded from Stormwater Utility Assessments (SUA), while the budget amount over the \$3.5 million threshold is taken from the reserve fund. The current reserve fund is approximately \$3 million. At a burn rate of \$1 million per year draw on the reserve fund, the reserve fund will last about three years. Since it takes several years to implement any kind of a funding strategy, now is the time to decide how to address the funding gap.

Options:

There are several options to filling the SUA Funding Gap. Some could be done collectively and would apply to all permittees, while some could be done individually and would only apply to that individual permittee. The following, in no particular order, are some of the options available.

Decentralize Costs. Analyze all the cost centers within the stormwater program and fund those services that can be funded through other mechanisms, for example funding street sweeping through a garbage franchise contract. This could be done collectively through the Program, individually for each permittee, and/or sub-regionally with a subset of permittees.

Grant funding. Create a new position that would focus solely on applying for grants to fund projects (programs are hard to fund with grants) that benefit all permittees or a significant subset of permittees.

New SUA Assessment. Conduct a Proposition 218 compliant election on a countywide, individual permittee, or sub-regional basis to create a new parcel-based assessment for stormwater services.

Senate Bill 231. Establish an assessment to fund stormwater services through a process utilizing Senate Bill 231 (2017).

Unfunded Mandate Claim. File a claim, or claims, with the Commission on State Mandates for reimbursement of costs in excess of the requirements in the Clean Water Act. This could be done collectively through the Program, individually by permittee, or sub-regionally with a subset of permittees.

Time Schedule Order. File an application for a Time Schedule Order seeking an extension of a mandated deadline for compliance. This could be done collectively through the Program, individually by permittee, or sub-regionally with a subset of permittees.

Community Facilities District. Form a jurisdiction-wide CFD that would provide stormwater related services associated with permit requirements. Each new development in the jurisdiction would be required to join the District so that each parcel would pay an assessment to fund District services.

Street Sweeping District. Form a district that would provide street sweeping services throughout the jurisdiction and adopt a fee to cover the cost of services. The fee could be adopted without a vote using the proposition 218 exemption for refuse collection. A more aggressive approach would form a "Street Sweeping and Litter Pickup District", which would pay for street sweeping, cleaning out full trash capture devices, and performing on-land litter pickup.

Impact Fees. These are one-time fees collected by permittees generally through the development process. Each permittee would analyze their impact fee schedule to ensure that impact fees cover as much of the stormwater costs associated with that development as possible.

Legislation. Over the past many years, there have been attempts to modify Proposition 218 to include "stormwater" as one of the exemptions to the voting requirement. To date this has not been successful, but it is still a viable option.

Options Report:

The Options Report will rely heavily on the report prepared for the 2012 Community Clean Water Initiative (2012 Funding Initiative). That report included the following seven sections, one section explaining all the options available to increase spending.

- Collect and analyze background and reference information
- Review and analyze projected future annual costs and sources of funding
- Identify/analyze various potential funding mechanisms
- Survey/evaluate voters support for a funding measure
- Final options and recommendations
- Fee report/engineers report
- Outreach and education

The Options Report will review the 2012 report, update the options, and incorporate the lessons learned from the 2012 Funding Initiative experience. The Options Report is envisioned to have two phases, with Committee input on each one. The first phase, the narrowing, will be an exercise to take all the possible options, with pros and cons for each one, and reducing the number to a short list of potential, viable options. This phase will include a discussion on

what information is needed to make a decision and choose an option, and will separate those options that would best be developed individually by permittee and those options that would best be developed collectively through the Program. The second phase, the decision, will be further exploration of the viable options and a recommended pathway forward.

Conclusion:

Staff recommends that the Committee direct staff to prepare a formal Options Report that will identify all possible options, describe each one, enumerate the pros and cons, estimate the cost to implement, and provide recommendations.

Fiscal Impact:

None at this time.

Attachments:

None.

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Provision	Provision Name	Link	Notes
C.2	Municipal Operations	Jump to C.2	
C.3	New Development and Redevelopment	Jump to C.3	
C.4	Industrial and Commercial Site Controls	Jump to C.4	
C.5	Illicit Discharge Detection and Elimination	Jump to C.5	
C.6	Construction Site Control	Jump to C.6	
C.7	Public Information and Outreach	Jump to C.7	
C.8	Monitoring	Jump to C.8	
C.9	Pesticides Toxicity Control	Jump to C.9	
C.10	Trash Load Reduction	Jump to C.10	
C.11	Mercury Controls	Jump to C.11	
C.12	Polychlorinated Biphenyls (PCBs) Controls	Jump to C.12	
C.13	Copper Controls	Jump to C.13	
C.14	Bacteria Control for Impaired Water Bodies	Jump to C.14	Relevant to Sunnyvale and Mountainview
C.15	Exempted and Conditionally Exempted Discharges	Jump to C.15	
C.16	Areas of Special Biological Significance	Jump to C.16	Relevant to County of San Mateo/James V. Fitzgerald Marine Reserve Area of Special Biological Significance. Assume EOA will add.
C.17	Discharges Associated with Unsheltered Homeless Populations	Jump to C.17	
C.18	Control of Sediment Discharges in Coastal San Mateo	Jump to C.18	Relevant to Pescadero-Butano Sediment TMDL and actions being taken on San Gregorio Creek. Assume EOA will add.
C.19	Contra Costa East County	Jump to C.19	Relevant to the eastern Contra Costa municipalities
C.20	Cost Reporting	Jump to C.20	
C.21	Asset Management	Jump to C.21	
C.22	Annual Reporting	Jump to C.22	

Sub-Provision	Sub-Provision Name	Description See Provision Workbooks for Details)	Comments	Initial Implementati	Due Date	Annual Submittal (Y/N)
C.2.f	Corporation Yard BMP Implementation	Provide Corp Yard SWPPPs or links in Annual Report	New reporting requirement		9/30/2023	N
C.2.h	Staff Training	Provide Municipal Staff Training on specified topics once per permit term	New training requirement, once during permit term			
C.3.b	Regulated Projects	Lower threshold for Road Projects	Lower threshold	7/1/2023		
C.3.b	Regulated Projects	Road Reconstruction new regulated project category	New requirement	7/1/2023		
C.3.b	Regulated Projects	Large SFR new regulated project category	New requirement	7/1/2023		
C.3.b	Regulated Projects	List of development projects that are subject to requirements of C.3.b.i.(2).			9/30/2023	N
C.3.b	Regulated Projects	Report development projects approved during the year			9/30/2022	Y
C.3.d	Numeric Sizing Criteria for Stormwater Treatment Systems	Tree runoff reduction credit report	Optional report		9/20/2025	N
C.3.d	Numeric Sizing Criteria for Stormwater Treatment Systems	Disallows use of tree interceptor credits	Removed credits	7/1/2022		
C.3.e	Alternative Compliance with Provisions C.3.b and C.3.d	New Special Project Category C	Change to Category C	7/1/2023		
C.3.j	Green Infrastructure Planning and Implementation	Update/Supplement GSI plans	New requirement		As needed	N
C.3.j	Green Infrastructure Planning and Implementation	GSI Numeric Targets	New requirement	7/1/2022		
C.3.j	Green Infrastructure Planning and Implementation	With cause, Permittees may use the Guidance for Sizing Green Infrastructure Facilities in Streets Projects (June 2019) with Water Board's conditions.	New requirement	7/1/2022		
C.3.j	Green Infrastructure Planning and Implementation	Form a regional Technical Work Group to discuss long term GSI goals and recommend long term percentage reductions.	New regional work group	7/1/2022		
C.3.j	Green Infrastructure Planning and Implementation	Certify that the tracking and mapping tools have been completed and are being implemented.	New reporting requirement		9/30/2023	N
C.3.j	Green Infrastructure Planning and Implementation	Report on updates, addenda, and changes to GSI programmatic implementation	New reporting requirement		9/30/2024	N
C.3.j	Green Infrastructure Planning and Implementation	Report on updates, addenda, and changes to GSI programmatic implementation	New reporting requirement		9/30/2025	N
C.3.j	Green Infrastructure Planning and Implementation	Report on progress made towards the retrofit requirements	New reporting requirement		9/30/2025	Y
C.3.j	Green Infrastructure Planning and Implementation	summary of lessons learned to-date with regard to Provision C.3.j.ii.(1)	New reporting requirement		9/30/2026	N
C.3.j	Green Infrastructure Planning and Implementation	Rural Area alternative compliance optional report	Optional new report		9/30/2023	N
C.3.j	Green Infrastructure Planning and Implementation	Each Permittee that wishes to use the one-time offset specified shall submit a report estimating the benefit realized by the adopted ordinance(s)	Optional new report		9/30/2023	N
C.3.j	Green Infrastructure Planning and Implementation	Collectively submit a report summarizing any TWG efforts and recommendations.	New reporting requirement		9/30/2025	N

C.3.j	Green Infrastructure Planning and Implementation	Certify that any projects counting towards Numeric Implementation retrofit requirements, which have not been completed by June 30, 2027, have been approved and fully funded by June 30, 2027	New reporting requirement		9/30/2027	N
C.4.b	Industrial and Commercial Business Inspection Plan (Inspection Plan)	Report description of which entity(ies) are responsible for reviewing and approving business license applications or a link to the website for business license applications.	New reporting requirement		9/30/2023	N
C.5.e	Control of Mobile Sources	Report details of mobile businesses inspected	New reporting requirement		9/30/2023	Y
C.5.f	Municipal Separate Storm Sewer System (MS4) Map	Identify information missing from the MS4 map and develop plan to complete maps	New requirement	7/1/2023		
C.5.f	Municipal Separate Storm Sewer System (MS4) Map	Submit plan and schedule to update MS4 map	New reporting requirement		9/30/2026	N
C.8.d	Low Impact Development (LID) Monitoring	Submit LID Monitoring Plan to TAG			3/1/2023	N
C.8.d	Low Impact Development (LID) Monitoring	Convene LID TAG	New requirement/workgroup	7/1/2022		
C.8.d	Low Impact Development (LID) Monitoring	Conduct LID Monitoring	New requirement	10/1/2023		
C.8.d	Low Impact Development (LID) Monitoring	Submit LID Monitoring Plan to Water Board	New reporting requirement		5/1/2023	N
C.8.e	Trash Monitoring	Collect and analyze the amount of trash discharged from MS4 outfalls that drain tributary drainage areas controlled to the Low trash generation level, during storm events	New requirement	10/1/2023		
C.8.e	Trash Monitoring	implement a pilot program to directly (in-stream) sample sections of receiving waters that receive runoff primarily from MS4 outfalls that drain tributary drainage areas controlled to the Low trash generation level, during storm events	New requirement	10/1/2024		
C.8.e	Trash Monitoring	Convene a Trash Monitoring TAG	New requirement	7/1/2023		
C.8.e	Trash Monitoring	Submit Trash Monitoring Plan	New reporting requirement		7/31/2023	N
C.8.f	Pollutants of Concern Monitoring	Receiving water monitoring	New requirement	10/1/2023		
C.8.h	Reporting	Submit annual LID monitoring progress report	New reporting requirement		3/31/2025	Y
C.8.h	Reporting	Submit annual trash monitoring progress report			3/31/2025	Y
C.8.h	Reporting	POCs Monitoring Plan	POCs Monitoring Plan now submitted with the UCMR (it used to be submitted in the Fall)		3/31/2023	Y
C.8.h	Reporting	Receiving Water Limitations Assessment Report			3/31/2023	N
C.8.h	Reporting	Integrated Monitoring Report	Includes LID and Trash Monitoring and budget summary of each monitoring requirement.		3/31/2026	N
C.8.h	Reporting	Comprehensive Bioassessment Final Report	New report		3/31/2024	N
C.10.a	Trash Reduction Requirements	Implement trash load reduction control actions. Demonstrate attainment of trash discharge reduction requirements of 90% by June 30, 2023; and 100% trash load reduction or no adverse impact to receiving waters from trash by June 30, 2025.	90% benchmark added and 100% benchmark extended to June 30, 2025.			
C.10.a	Trash Reduction Requirements	If 90% benchmark is not attained by June 30, 2023, submit revised trash load reduction plan and implementation schedule of additional trash load reduction control actions to achieve 90% and 100% benchmarks			9/30/2023	N

C.10.a	Trash Reduction Requirements	Submit revised Trash Generation Area Map			9/30/2024	N
C.10.a	Trash Reduction Requirements	Ensure that private lands that are moderate, high, or very high trash generating are equipped with full trash capture systems or are managed with trash discharge control actions		7/1/2022		
C.10.b	Demonstration of Trash Reduction Outcomes	Report FCS to Vector Control			9/30/2023	Y
C.10.c	Requirements for Flood Management Agencies	Flood Control Agencies Only: Implement trash control measures to control Moderate, High, and Very High trash generation areas		7/1/2022		
C.10.d	Trash Load Reduction Plans	If unable to meet the 90 percent mandatory trash reduction compliance benchmark without offsets submit updated Trash Load Reduction Plan			9/30/2023	N
C.10.d	Trash Load Reduction Plans	If unable to attain the 100 percent mandatory trash reduction compliance benchmark Permittees may be granted additional time contingent on developing and implementing DDCP				
C.10.e	Impracticability Report	Collectively develop a Trash Impracticability Report			3/31/2023	N
C.10.e	Impracticability Report	Use an approved trash impracticability report in developing the updated Trash Load Reduction Work Plans		6/30/2023	9/30/2023	N
C.10.f	Optional Trash Load Reduction Offset Opportunities	Submit the DDCP for approval			4/1/2024	N
C.10.g	Reporting	Submit a revised trash generation area map or maps			9/30/2024	N
C.10.g	Reporting	Summarize implementation actions and progress on PLDA			9/30/2023	Y
C.10.g	Reporting	Submit a notice of noncompliance pursuant if unable to attain the 90 percent mandatory trash reduction compliance benchmark			6/30/2023	N
C.10.g	Reporting	Submit a report evaluating their trash reduction, relative to 2009 baseline conditions, without including offsets. If unable to meet the 90 percent mandatory trash reduction compliance benchmark without offsets, submit updated Trash Load Reduction Plan			9/30/2023	N
C.10.g	Reporting	Submit a notice of noncompliance pursuant if unable to attain the 100 percent mandatory trash reduction compliance benchmark while accounting for credits from new source controls			6/30/2025	N
C.10.g	Reporting	Permittees granted additional time to attain 100 percent reduction via full trash capture, or equivalent, submit a report that confirms that they reached 100 percent trash load reduction, or a notice of noncompliance			12/31/2025	N
C.10.g	Reporting	Programmatic Trash Impracticability Report			3/31/2023	N
C.10.g	Reporting	Submit a summary of the additional cleanup actions implemented and the benefit to water quality achieved if Permittees offset part of their trash load percent reduction through additional cleanup of creek and shoreline areas			9/30/2024	N
C.10.g	Reporting	Permittees with approved DCDPs provide information for which they use an offset from the implementation of Provision C.10.f.ii towards their trash load percent reduction			9/30/2023	Y
C.11.a	Assess Mercury Load Reductions from Stormwater	Submit documentation confirming that control measures from the previous Permit term continue to be implemented at an intensity sufficient to maintain the credited load reduction.			9/30/2023	Y
C.11.a	Assess Mercury Load Reductions from Stormwater	Update this assessment methodology as necessary for use in the subsequent permit term			9/30/2026	N
C.11.a	Assess Mercury Load Reductions from Stormwater	Report the total loads reduced using the assessment methodologies			9/30/2026	N

C.11.b	Program for Source Property Identification and Abatement	Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of the old industrial land use			9/30/2022	Y
C.11.b	Program for Source Property Identification and Abatement	Report on ongoing enhanced O&M activities associated with all past contaminated property referrals			9/30/2022	Y
C.11.b	Program for Source Property Identification and Abatement	Report acreage of land investigated, description of properties referred, and estimated mass of Hg load reduced.			9/30/2026	N
C.11.c	Program for Control Measure Implementation in Old Industrial Areas	Implement treatment or source controls on specified acres of OIA or equivalent load reduction		7/1/2022		
C.11.c	Program for Control Measure Implementation in Old Industrial Areas	Submit plans and schedules for implementing control measures for OIA.			3/31/2023	N
C.11.c	Program for Control Measure Implementation in Old Industrial Areas	Report on OIA control measure implementation.			9/30/2023	Y
C.11.c	Program for Control Measure Implementation in Old Industrial Areas	Report on OIA control measures implemented, total acreage treated, and the estimated Hg loads reduced.			9/30/2026	N
C.11.e	Plan and Implement Green Stormwater Infrastructure to Reduce Mercury Loads	Report all GSI implemented during permit term, total acreage treated, and the estimated Hg loads reduced.			9/30/2026	N
C.11.f	Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations	Develop implementation plan for the next permit term.			3/31/2026	N
C.11.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Submit a workplan with preliminary schedule for the studies.			9/30/2023	N
C.11.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Report on status of studies.			9/30/2023	N
C.11.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Report on findings of studies and potential control measures to be investigated in future permit terms.			3/15/2026	N
C.11.h	Implement a Risk Reduction Program	Report on program status.			9/30/2023	Y
C.11.h	Implement a Risk Reduction Program	Evaluate program effectiveness.			9/30/2026	N
C.12.a	Assess PCBs Load Reductions from Stormwater	Submit documentation confirming that control measures from the previous Permit term continue to be implemented at an intensity sufficient to maintain the credited load reduction.			9/30/2023	Y
C.12.a	Assess PCBs Load Reductions from Stormwater	Update this assessment methodology as necessary for use in the subsequent permit term			9/30/2026	N

C.12.a	Assess PCBs Load Reductions from Stormwater	Report the total loads reduced using the assessment methodologies			9/30/2026	N
C.12.b	Program for Source Property Identification and Abatement	Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of the old industrial land use			9/30/2022	Y
C.12.b	Program for Source Property Identification and Abatement	Report on ongoing enhanced O&M activities associated with all past contaminated property referrals			9/30/2022	Y
C.12.b	Program for Source Property Identification and Abatement	Report acreage of land investigated, description of properties referred, and estimated mass of PCBs load reduced.			9/30/2026	N
C.12.c	Program for Control Measure Implementation in Old Industrial Areas	Report on OIA control measure implementation.		7/1/2022		
C.12.c	Program for Control Measure Implementation in Old Industrial Areas	Submit plans and schedules for implementing control measures for OIA.			3/31/2023	N
C.12.c	Program for Control Measure Implementation in Old Industrial Areas	Report on OIA control measure implementation.			9/30/2023	Y
C.12.c	Program for Control Measure Implementation in Old Industrial Areas	Report on OIA control measures implemented, total acreage treated, and the estimated PCBs loads reduced.			9/30/2026	N
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Implement Caltrans specification for managing PCBs-containing materials during bridge maintenance.		7/1/2022		
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Track development of the Caltrans specification		7/1/2022		
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Develop description of the Caltrans specification	If spec is not available by 9/30/2022 report immediately following availability of specification)	7/1/2022	9/30/2022	N
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Prepare bridge inventory.			9/30/2023	N
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Confirm use of Caltrans specification and estimate total volume of materials managed and load estimate			9/30/2023	Y
C.12.d	Program for Controlling PCBs from Bridges and Overpasses	Report estimate of the total PCBs mass load reduced, consistent with approved accounting procedures, resulting from implementing this control measure.			9/30/2026	N
C.12.e	Program for Controlling PCBs from Electrical Utilities	Develop and implement program for OFEE for municipally owned OFEE		7/1/2022		
C.12.e	Program for Controlling PCBs from Electrical Utilities	Develop/improve and submit spill response SOPs for municipally owned OFEE.		7/1/2022	9/30/2023	N
C.12.e	Program for Controlling PCBs from Electrical Utilities	Develop and implement a plan to maintain and upgrade municipally owned OFEE.		7/1/2022	9/30/2024	N
C.12.e	Program for Controlling PCBs from Electrical Utilities	Report actions taken that remove municipally owned PCBs-containing OFEE along with the loads avoided and the details of the calculations and assumptions used to estimate the load reduced.			9/30/2023	Y

C.12.e	Program for Controlling PCBs from Electrical Utilities	Document the PCBs loads avoided from the removal of municipally-owned PCBs-containing OFEE through maintenance programs and system upgrades from 2002-7/1/2022			9/30/2023	N
C.12.e	Program for Controlling PCBs from Electrical Utilities	Submit the estimated PCBs loads reduced during the permit term associated with municipally owned OFEE removal resulting from maintenance programs and system upgrades.			9/30/2026	N
C.12.e	Program for Controlling PCBs from Electrical Utilities	Collaborate with the Water Board to determine PCBs loadings in OFEE from non-municipally owned electrical utilities.		7/1/2022		
C.12.e	Program for Controlling PCBs from Electrical Utilities	Submit a report discussing (a) locations of the PCBs-containing OFEE still in service, (b) previous locations of PCBs-containing OFEE, and (c) opportunities to improve non-municipally owned electrical utilities' standard operating procedures for spill response, reporting, cleanup, and sampling and analysis.	Due Within 12-months of receiving info from Water Board on non-municipally owned electrical utilities.		TBD	N
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Beginning the 2023 rainy season, inspect demolition sites with applicable structures containing building materials with PCBs concentrations of 50 ppm or greater pursuant to Provision C.6 to ensure that effective construction pollutant controls are used to prevent discharge into the MS4.		10/1/2022		
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Require demolition contractors to provide notification to the Permittees, the Water Board, and U.S. EPA at least one week before any demolition is to occur.		7/1/2023		
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Enhance construction site control program to minimize migration of PCBs into the MS4 from applicable structures containing building materials with PCBs concentrations of 50 ppm or greater during demolition activities		7/1/2023		
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Report enhancements to construction site control programs to minimize migration of PCBs from demolition activities into the MS4.			9/30/2023	N
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Verify that PCBs in demolished buildings are properly managed to minimize transport to the MS4 by obtaining official documentation that the building materials with PCBs concentrations of 50 ppm or greater in these demolished applicable structures were disposed appropriately according to state and federal regulations.		7/1/2023		
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Provide documentation for each jurisdiction seeking exemption from Provision C.12.g requirements based on lack of applicable structures.			9/30/2023	N
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Report the number of applicable structures that applied for a demolition permit and a running list of the applicable structures that applied for a demolition permit with address, date, description, etc. as stated in MRP			9/30/2023	Y
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Report whether sites were inspected during demolition, and for those cases where notification and advance approval from the U.S. EPA is not required and were approved for demolition after June 30, 2023, the hazardous waste manifest prepared for transportation of the material to a disposal facility.			9/30/2024	Y

Need to confirm implementation date, does the 2023 Rainy Season start in 10/2022 or 10/2023?

C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Submit a regional evaluation of the effectiveness of the protocol for controlling PCBs during building demolition as well as supporting data.			9/30/2026	N
C.12.g	Manage PCB-Containing Materials and Wastes During Building Demolition Activities	Submit an updated assessment methodology and data collection program to quantify PCBs loads reduced through implementation of the protocol for controlling PCBs-containing materials and wastes during demolition of applicable structures.			9/30/2026	N
C.12.h	Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations	Develop implementation plan for the next permit term.			3/31/2026	N
C.12.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Submit a workplan with preliminary schedule for the studies.			9/30/2023	N
C.12.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Report on status of studies.			9/30/2023	N
C.12.g	Fate and Transport Study of Mercury: Urban Runoff Impact on San Francisco Bay Margins	Report on findings of studies and potential control measures to be investigated in future permit terms.			3/15/2026	N
C.12.j	Implement a Risk Reduction Program	Report on program status.			9/30/2023	Y
C.12.j	Implement a Risk Reduction Program	Evaluate program effectiveness.			9/30/2026	N
C.14.a.ix	Compliance with Receiving Water Limitations	Submit a Mid-Permit Interpretive Report.			3/31/2025	N
C.14.a.ix	Compliance with Receiving Water Limitations	Submit a Final Interpretive Report.			12/31/2026	N
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Collectively convene a regionwide Firefighting Discharges Working Group		7/1/2022		
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Collectively submit a Firefighting Discharges Report			9/30/2025	N
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Begin implementation of and reporting on the recommendations in the Firefighting Discharges Report		9/30/2025	9/30/2026	Y
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Ensure proper BMPs and SOPs are included in contracts for non-municipal (contracted) staff hired by Permittees to assist with containment and cleanup, and to assist with prevention and mitigation of adverse impacts, of discharges associated with firefighting emergencies.		7/1/2022	9/30/2023	Y

C.15.b	Conditionally Exempted Non-Stormwater Discharges	For large industrial sites evaluate the adequacy of their BMPs and SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters and cause those BMPs and SOPs to be improved as appropriate.		7/1/2022	9/30/2023	Y
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Require all municipal staff and contracted staff hired by Permittee that participate in the containment and cleanup of discharges of firefighting water and foam from firefighting emergencies within their jurisdictions to attend at least one training on containment and cleanup BMPs and SOPs		9/30/2025	9/30/2027	N
C.15.b	Conditionally Exempted Non-Stormwater Discharges	Implement and/or require firefighting personnel acting within their jurisdictions to implement BMPs and SOPs for emergency discharges to the extent that the implementation of such BMPs does not interfere with immediate emergency response operations or impact public health and safety.		9/30/2025	9/30/2027	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Collectively develop and submit a best management practice report			9/30/2023	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Submit a map identifying the approximate location(s) of unsheltered homeless populations			9/30/2023	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Report on the programmatic efforts being implemented to address MS4 discharges associated with homelessness.			9/30/2023	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Report on the programmatic efforts being implemented to address MS4 discharges associated with homelessness.			9/30/2025	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Identify and implement appropriate best management practices to address MS4 discharges associated with homelessness that impact water quality			9/30/2023	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Identify and implement appropriate best management practices to address MS4 discharges associated with homelessness that impact water quality			9/30/2025	N
C.17.a	Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	Use the biennial point-in-time census surveys and related information, and the regional coordination tasks to review and update implementation practices.			9/30/2025	N
C.20.c	Reporting	Submit cost reporting framework		7/1/2022	6/30/2023	N
C.20.c	Reporting	Submit fiscal analyses.		7/1/2024	9/30/2025	Y
C.21.b	Asset Management Implementation	Begin implementing and Asset Management Plan		7/1/2025		
C.21.c	Asset Management Reporting	Submit an Asset Management Plan			9/30/2025	N
C.21.c	Asset Management Reporting	Report on the Asset Management Plan implementation			9/30/2026	Y

C.21.c	Asset Management Reporting	Submit the Climate Change Adaptation Report			9/30/2026	N
C.22.a	Annual Report	Submit Annual Reports electronically including verified e-signature			9/30/2022	Y
C.22.b	Report Form	Collectively develop and submit annual report format			3/1/2023	Y
C.22.c	Compliance Certification	Certify in Annual Report compliance with MRP			9/30/2022	Y
C.25	Expiration Date	Submit ROWD			12/22/2026	N

Provision C.2 Municipal Operations

Sub-Provision Name	Tasks	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Street and Road Repair and Maintenance	ii.(1) Require the proper management of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater. Coordinate with sanitary sewer agencies.	No			X		7/1/2022		
Street and Road Repair and Maintenance	ii.(2). Require sweeping and/or vacuuming to remove debris, concrete, or sediment residues from such work sites upon completion of work. Require cleanup of all construction debris, spills, and leaks using dry methods (e.g., absorbent materials, rags, pads, and vacuuming).	No			X		7/1/2022		
Street and Road Repair and Maintenance	iii.(1). Report on implementation of and compliance with these BMPs.	No			X			9/30/2022	Y
Street and Road Repair and Maintenance	iii.(2). Make applicable supporting BMP documents available to Water Board representatives during audits or inspections, and upon request.	Yes	Minor		X		7/1/2022		
Sidewalk/Plaza Maintenance and Pavement Washing	i. Implement BMPs that prevent the discharge of polluted wash water and non-stormwater to storm drains for pavement washing; sidewalk and plaza cleaning; mobile cleaning; pressure washing operations in locations such as parking lots and garages; trash areas; and gas station fueling areas. Implement the BMPs included in BASMAA's Mobile Surface Cleaner Program and coordinate with sanitary sewer agencies .	Yes	Minor; BMPs for washing down outside areas of human habitation shall include sanitizing procedures.		X		1/1/2016		
Sidewalk/Plaza Maintenance and Pavement Washing	ii.(1) Report on implementation of and compliance with these BMP's.	No			X			9/30/2022	Y
Sidewalk/Plaza Maintenance and Pavement Washing	ii.(1) Make applicable supporting BMP documents available to Water Board representatives during audits or inspections, and upon request.	Yes	Minor		X				
Bridge and Structure Maintenance and Graffiti Removal	i.(1). Implement appropriate BMPs to prevent polluted stormwater and non-stormwater discharges from bridges and structural maintenance activities directly over water or into storm drains.	No			X		7/1/2022		
Bridge and Structure Maintenance and Graffiti Removal	i.(2). Implement BMPs for graffiti removal that prevent non-stormwater and wash water discharges into storm drains.	No			X		7/1/2022		
Bridge and Structure Maintenance and Graffiti Removal	ii.(1). Prevent all debris, including structural materials and coating debris, such as paint chips, and other debris and pollutants generated in bridge and structure maintenance or graffiti removal from entering storm drains or water courses.	No			X		7/1/2022		
Bridge and Structure Maintenance and Graffiti Removal	ii.(2). Protect nearby storm drain inlets before removing graffiti from walls, signs, sidewalks, or other structures. Prevent any discharge of debris, cleaning compound waste, paint waste, or wash water due to graffiti removal from entering storm drains or watercourses.	No			X		7/1/2022		
Bridge and Structure Maintenance and Graffiti Removal	ii.(3). Use proper disposal methods for wastes generated from these activities. Train permittee employees and/or specify in contracts the proper capture and disposal methods for the wastes generated.	No			X		7/1/2022		
Bridge and Structure Maintenance and Graffiti	iii.(1). Report on implementation of and compliance with these BMPs.	No			X			9/30/2022	Y
Bridge and Structure Maintenance and Graffiti Removal	iii.(2).Make applicable supporting BMP documents available to Water Board representatives during audits or inspections, and upon request.	Yes	Minor		X		7/1/2022		

Provision C.2 Municipal Operations

Sub-Provision Name	Tasks	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Stormwater Pump Stations	ii.(1) Implement corrective actions at permittee-owned or operated pump stations upon becoming aware that the discharge from a pump station has a dissolved oxygen (DO) concentration below 3.0 mg/L, such as continuous pumping at a low flow rate, aeration, or other appropriate methods to maintain DO concentrations of the discharge above 3 milligrams per liter (mg/L) and verify the effectiveness of the corrective actions with monitoring. Corrective actions do not need to be implemented on discharges from pump stations that remain in the stormwater collection system or infiltrate into a dry creek immediately downstream.	No			X		7/1/2022		
Stormwater Pump Stations	ii.(2) Ensure that pump stations are free from debris and trash and replace any oil absorbent booms, as needed, and investigate and abate illicit discharges. Pump stations excluded from C.2.d.ii (1) above are not excluded from this requirement.	No			X		7/1/2022		
Stormwater Pump Stations	ii.(3). Maintain records of inspection maintenance, implementation of corrective actions, and any monitoring records at Permittee-owned or -operated pumped stations. These records shall be made available to Water Board staff or its representatives during inspections and audits, or otherwise upon request.	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(1) Implement BMPs for erosion and sediment control measures during construction and maintenance activities on rural roads.	Yes	Minor; Rural roads include paved, unpaved, utility, and access roads in rural areas.		X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(1). Implement appropriate BMPs during and post construction and maintenance of stream crossings and drainage culverts to comply with water quality standards.	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(1). Implement BMPs for erosion and sediment control measures during construction and maintenance activities on rural roads, including developing and implementing appropriate training and technical assistance resources for rural public works activities.	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(a). Select road design, construction, maintenance, and repairs in rural areas that prevent and control road-related erosion and sediment transport	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(b). Identify and prioritize rural road maintenance on the basis of soil erosion potential, slope steepness, and stream habitat resources	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(c). Construct roads and culverts that do not impact creek functions. New or replaced culverts shall not create a migratory fish passage barrier, where migratory fish are present, or lead to stream instability	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(d). Implement an inspection program to maintain rural roads' structural integrity and prevent impacts to water quality	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(e). Maintain rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts, and address excessive erosion	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(f). Re-grade unpaved rural roads to slope outward where consistent with road engineering safety standards, and install water bars as appropriate	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(2).(g). Replace existing culverts or design of new culverts or bridge crossings shall use measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology in a stable manner	No			X		7/1/2022		

Provision C.2 Municipal Operations

Sub-Provision Name	Tasks	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Rural Public Works Construction and Maintenance	ii.(3) Incorporate information about the importance of planning and construction in avoiding water quality impacts into existing training and guidance on permitting requirements for rural public works activities	No			X		7/1/2022		
Rural Public Works Construction and Maintenance	ii.(4) Provide training incorporating these BMPs to rural public works maintenance staff at least twice within this Permit term	No		X	X		Twice in permit term.		
Rural Public Works Construction and Maintenance	iii. Report on the implementation of and compliance with BMPs for rural public works construction and maintenance activities, including reporting on increased maintenance in priority areas, in the Annual Report	No			X			9/30/2022	Y
Corporation Yard BMP Implementation	ii.(1) Implement BMPs to minimize pollutant discharges in stormwater and prohibit non-stormwater discharges, such as wash waters from street sweepers, vactor trucks, or other related equipment. Pollution control actions shall include, but not be limited to, good housekeeping practices, material and waste storage control, and vehicle leak and spill control.	No			X		7/1/2022		
Corporation Yard BMP Implementation	ii.(2) Routinely inspect corporation yards to ensure that non-stormwater discharges are not entering the storm drain system and that pollutant discharges are prevented to the maximum extent practicable. At a minimum, each corporation yard shall be fully inspected each year between August 1 and September 30. Permittees shall cease or cause to be ceased any active non-stormwater discharges immediately after they are discovered. Corrective actions shall be implemented before the next rain event, but no longer than 10 business days after the potential and/or actual discharges are discovered. Corrective actions can be temporary, in which case more time can be allowed for permanent corrective actions. If more than 10 business days are required for compliance, a rationale shall be recorded.	Yes	Minor. Routine inspections shall be completed each year between August 1 and September 30		X		7/1/2022		
Corporation Yard BMP Implementation	ii.(3). Plumb all vehicle and equipment wash areas to the sanitary sewer after coordination with the local sanitary sewer agency and equip with a pretreatment device (if necessary) in accordance with the requirements of the local sanitary sewer agency. In areas where a sanitary sewer connection is not available, the Permittees shall collect and haul the wash water to an alternative sanitary sewer connection or municipal wastewater treatment plant, or implement appropriate BMPs to collect, properly treat, and reuse wash water onsite without any discharge.	No			X		7/1/2022		
Corporation Yard BMP Implementation	ii.(4). Use dry cleanup methods when cleaning debris and spills from corporation yards. If wet cleaning methods must be used (e.g., pressure washing), the Permittee shall ensure that wash water is collected and disposed in the sanitary sewer after coordination with the local sanitary sewer agency and in accordance with the requirements of the local sanitary sewer agency. Any private companies hired by the Permittee to perform cleaning activities on Permittee-owned property shall follow the same requirements. In areas where a sanitary sewer connection is not available, the Permittees shall collect and haul the wash water to a municipal wastewater treatment plant, or implement appropriate BMPs and dispose of the wastewater to land in a manner that does not adversely impact surface water or groundwater.	No			X		7/1/2022		
Corporation Yard BMP Implementation	ii.(5)Cover and/or berm outdoor storage areas containing pollutants to prevent discharges of polluted stormwater runoff or run-on to storm drain inlets.	No			X		7/1/2022		
Corporation Yard BMP Implementation	iii.(1) Report list of activities conducted in the corporation yards that have BMPs in the site-specific SWPPP, the date(s) of inspections, the results of inspections, and any follow-up actions, including the date of any necessary corrective actions implemented. The information may be reported in a narrative or tabular format.	Yes	Minor. Information may be reported in a narrative or tabular form		X			9/20/2023	Y
Corporation Yard BMP Implementation	iii.(2) Make corporation yard SWPPP(s) available to the Water Board by providing links to online documents or submitting the documents as part of the 2023 Annual Report.	New			X			9/30/2023	N

Provision C.3. New Development and Redevelopment

Sub-Provision Name	Task	Change from MRP 3.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
New Development and Redevelopment Performance Standard Implementation	i.(1) Have adequate legal authority to implement all requirements of Provision C.3.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(2) Have adequate development review and permitting procedures to impose conditions of approval or other enforceable mechanisms to implement the requirements of Provision C.3. For projects discharging directly to CWA section 303(d) listed waterbodies, conditions of approval must require that post development runoff not exceed predevelopment levels for such pollutants that are listed.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(3) Evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as under CEQA.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(4) Provide training adequate to implement the requirements of Provision C.3 for staff, including interdepartmental training.	No		A	X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(5) Provide outreach adequate to implement the requirements of Provision C.3, including providing education materials to municipal staff, developers, contractors, construction site operators, and owner/builders, early in the planning process and as appropriate.	No		A	X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(6) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate site design measures that include minimizing land disturbance and impervious surfaces (especially parking lots); clustering of structures and pavement; disconnecting roof downspouts; use of micro-detention, including distributed landscape detention; preservation of open space; protection and/or restoration of riparian areas and wetlands as project amenities.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(7) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate source control measures to limit pollutant generation, discharge, and runoff, to the maximum extent practicable.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	i.(8) Revise, as necessary, General Plans to integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies and to require implementation of the measures required by Provision C.3 for all Regulated Projects defined in Provision C.3.b.	No			X		7/1/2022		
New Development and Redevelopment Performance Standard Implementation	ii. Provide a brief summary of the method(s) of implementation of Provisions C.3.a.i.(1)–(8) in the 2023 Annual Report.	No	Resubmittal		X			9/30/2023	N
Regulated Projects	i. Require all Regulated Projects to implement LID source control, site design, and stormwater treatment onsite or at a joint treatment facility (per Provisions C.3.c and C.3.d) unless Provision C.3.e alternative compliance options are invoked.	No		A	X		7/1/2022		
Regulated Projects	i.(1) Any Regulated Project that has been approved with stormwater treatment measures in compliance with Provision C.3.d under a previous MS4 permit is exempt from Provision C.3.c (LID requirements).	No			X		7/1/2022		
Regulated Projects	i.(2) Require any Regulated Project that was approved with no C.3 treatment requirements under a previous MS4 permit, and that has not begun construction by July 1, 2022, to comply with C.3.c and C.3.d, unless eligible for one of the exemptions in C.3.b.i.(2)(a) and (b).	No			X		7/1/2022		

Provision C.3. New Development and Redevelopment

Sub-Provision Name	Task	Change from MRP 3.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Regulated Projects	ii.(1) Special Land Use Categories as described in MRP	Yes	Added list of pavement maintenance practices that are excluded and those that will trigger C.3 requirements at the 5,000 sf threshold		X		7/1/2022 (except new requirements effective 7/1/2023)		
Regulated Projects	ii.(2) Other Development Projects	Yes	Threshold reduces to 5,000 sf and includes portions of the public right of way that are developed or redeveloped as part of the Regulated Project	A	X		7/1/2022 (except new threshold effective 7/1/2023)		
Regulated Projects	ii.(3) Other Redevelopment Projects	Yes	Threshold reduces to 5,000 sf and includes portions of the public right of way that are developed or redeveloped as part of the Regulated Project. The following categories were added: new and reconstructed private roads and private trails.	A	X		7/1/2022 (except new threshold & categories effective 7/1/2023)		
Regulated Projects	ii.(4) New or Widening Road Projects ("Road Projects" in MRP 2.0)	Yes	Threshold reduces to 5,000 sf		X		7/1/2022 (except new threshold effective 7/1/2023)		
Regulated Projects	(5) Road Reconstruction Projects	New	1) Road projects that involve the reconstruction of existing streets or roads which create and/or replace greater than or equal to one contiguous acre of impervious surface and that are public road projects and/or fall under the building and planning authority of a Permittee, including sidewalks and bicycle lanes that are built or rebuilt as part of the existing streets or roads. 2) This category includes utility trenching projects which average ≥ 8 feet wide over length of project.	A	X		7/1/2023		
Regulated Projects	(6) Large Detached Single-Family Home Projects	New	Detached single-family home projects that create and/or replace 10,000 sf or more of impervious surface (collectively over the entire project site) and are not part of a larger development or redevelopment plan are considered Regulated Projects. The category includes addition of Accessory Dwelling Units (ADU) on a single family home that is not part of a subdivision.	A	X		7/1/2023		
Regulated Projects	iii. Maintain a database or equivalent tabular format that contains all the information required to be reported under C.3.b.iv.	No			X		7/1/2022		
Regulated Projects	iv.(1) In the 2023 Annual Report, provide a complete list of development projects that are subject to requirements of C.3.b.i.(2). Indicate type of stormwater treatment system required or specific exemption granted. If there are no such projects, so state in the 2023 Annual Report.	No			X		7/1/2022	9/30/2023	N
Regulated Projects	iv.(2) For each Regulated Project approved during the FY reporting period, required information shall be reported electronically in tabular form in each Annual Report.	Yes	Minor. Added requirement to include whether the project has been completed. If not, report the estimated project completion date	A	X			9/30/2022 (add project completion date starting 9/30/2023)	Y
Low Impact Development (LID)	i. Require all Regulated Projects to implement LID source control, site design and stormwater treatment requirements, treat 100% of the amount of runoff specified in C.3.d, and/or meet requirements in C.3.e for alternative compliance.	No		A	X		7/1/2022		

Provision C.3. New Development and Redevelopment

Sub-Provision Name	Task	Change from MRP 3.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Low Impact Development (LID)	i.(2)(c)(ii)a. The Permittees may convene a workgroup with Water Board staff to discuss and investigate the pollutant removal effectiveness and hydrologic equivalency of – and suggested criteria for – high flow-rate media treatment systems in combination with retention/detention measures, such as silva cells and structural soils, as compared to conventional	New	Optional	A	A	X		No date provided	
Numeric Sizing Criteria for Stormwater Treatment Systems	i. Require that stormwater treatment systems constructed for Regulated Projects meet at least one of the following hydraulic sizing design criteria: (1) Volume Hydraulic Design Basis; (2) Flow Hydraulic Design Basis; and (3) Combination Flow and Volume Design Basis.	No			X		7/1/2022		
Numeric Sizing Criteria for Stormwater Treatment Systems	ii. Report on numeric sizing criteria for stormwater treatment systems using the tables required in C.3.b.iv.(2)	No			X			9/30/2023	Y
Numeric Sizing Criteria for Stormwater Treatment Systems	iii. Limitations on Use of Infiltration Devices in Stormwater Treatment Systems	No			X		7/1/2022		
Numeric Sizing Criteria for Stormwater Treatment Systems	iv.1) Tree Runoff Reduction and Treatment - Permittees collectively may submit a proposal, subject to the Executive Officer's approval, which evaluates the benefit and associated criteria of runoff reduction associated with trees with respect to treatment control sizing, which evaluates and includes as appropriate the findings of the Healthy Watersheds, Resilient Baylands project, and which will be considered for incorporation into a subsequent Permit.	New	Optional	A	A	X		9/30/2025	
Numeric Sizing Criteria for Stormwater Treatment Systems	iv. Tree Interceptor Credits, as described in the 2011 BASMAA Feasibility/Infeasibility Criteria Report submitted pursuant to Provision C.3.c.i.(2)(b)(iv) of MRP 1, shall not be used to reduce the stormwater treatment required pursuant to Provision C.3.	New			X		7/1/2022		
Alternative Compliance with Provisions C.3.b and C.3.d	i. Permittee may allow a Regulated Project to provide alternative compliance with Provision C.3.b. using one of two options: (1) LID treatment at an offsite location; or (2) payment of in-lieu fees. Offsite and regional projects must be completed within 3 years after construction of the Regulated Project (up to 5 years with EO approval).	No			X		7/1/2022		
Alternative Compliance with Provisions C.3.b and C.3.d	ii. Special Projects and LID Treatment Reduction Credits	New	Major change to Category C	A	X		7/1/2022 (except new Category C effective 7/1/2023)		
Alternative Compliance with Provisions C.3.b and C.3.d	iv. Annual reporting (of approved Regulated Projects) must be done as part of C.3.b reporting. Any Permittee choosing not to allow alternative compliance must include a statement to that effect in the Annual Report.	No			X			9/30/2022	Y
Alternative Compliance with Provisions C.3.b and C.3.d	v. Track and annually report identified potential Special Projects using Table 3.1 and include a narrative discussion for each project of 100% LID treatment feasibility onsite, offsite or at a regional project. Once Special Projects receive final discretionary approval, report them in the C.3.b reporting table in the same reporting year as approve.	Yes	Minor; added a field to report "Total Impervious Surface Created/ Replaced" and requires reporting Number of DUs in each AMI Category for Category C projects to Special Projects Reporting Table		X		7/1/2022 (except new Category C effective 7/1/2023)	9/30/2023 (except new Category C on 9/30/2024)	Y
Alternative Certification of Stormwater Treatment Systems	i. In lieu of reviewing a Regulated Project's adherence to Provision C.3.d., a Permittee may elect to have a third party conduct detailed review and certify the Regulated Project's adherence to Provision C.3.d.	No			X		7/1/2022		
Alternative Certification of Stormwater Treatment Systems	iii. Report projects reviewed by third parties in the C.3.b reporting table.	No			X			9/30/2022	Y
Hydromodification Management	i. Require HM Projects to meet the Hydromodification Management Standard of Provision C.3.g.ii.	No		A	X		7/1/2022		

Provision C.3. New Development and Redevelopment

Sub-Provision Name	Task	Change from MRP 3.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Hydromodification Management	vi. Report required information on each HM Project approved during the reporting period in the C.3.b reporting table. Report collectively on any modifications made to the BAHM.	No		X	X			9/30/2022	Y
Operation and Maintenance of Stormwater Treatment Systems	i. Implement an Operation and Maintenance (O&M) Verification Program.	No			X		7/1/2022		
Operation and Maintenance of Stormwater Treatment Systems	ii.(4) and (5) Maintain a database of all Regulated Projects that have installed pervious pavement systems, stormwater treatment systems, and HM controls.	No			X		7/1/2022		
Operation and Maintenance of Stormwater Treatment Systems	ii.(6) Develop and/or maintain a prioritized O&M Inspection Plan for inspecting all installed pervious pavement systems (3,000 sq. ft. or more), stormwater treatment systems, and HM controls.	No			X		7/1/2022		
Operation and Maintenance of Stormwater Treatment Systems	ii.(7) Develop and/or maintain an Enforcement Response Plan for O&M inspections that contains enforcement procedures, tools and field scenarios, and timely correction of identified problems (within 30 days of identification, unless a rationale is provided).	No		A	X		7/1/2022		
Operation and Maintenance of Stormwater Treatment Systems	v.(1) and (3) Maintain database or equivalent tabular format and provide to Water Board staff upon request. Report summary data on inspections conducted for Regulated Projects.	No			X			9/30/2023	Y
Operation and Maintenance of Stormwater Treatment Systems	v.(2) On an annual basis before the wet season, provide a list of newly installed (within the reporting period) stormwater treatment systems and HM controls to the local mosquito and vector control agency and include a copy of the communication in the Annual Report.	Yes	Minor; added requirement to include communication in Annual Report	X				9/30/2022 (requirement to include communication in AR on 9/30/2023)	Y
Site Design Measures for Small Projects and Smaller Detached Single-Family Home Projects	i. Require all development projects that create and/or replace between 2,500 and 5,000 sq. ft. of impervious surface and detached single-family home projects that create and/or replace 2,500 sq. ft. or more of impervious surface to install at least one of six site design measures.	Yes	Minor; changed "between 2,500 and 10,000 sf" to "2,500 and 5,000 sf" to be consistent with new thresholds	A	X		7/1/2022 (except new threshold effective 7/1/2023)		
Site Design Measures for Small Projects and Smaller Detached Single-Family Home Projects	ii. Discuss the implementation of this provision, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training in each Annual Report.	No			X			9/30/2022	Y
Green Infrastructure Planning and Implementation	ii.(1)(a)-(f) Update and/or supplement GSI Plans as needed to: revise implementation mechanisms; continue to update related municipal plans; develop funding mechanisms; update guidance, details and specifications as appropriate; implement tracking/mapping tools; adopt/amend legal mechanisms as necessary. Upon request by Water Board staff, provide justification for not updating planning documents.	New	New requirement	A	X		7/1/2022		
Green Infrastructure Planning and Implementation	ii.(1)(g)(i)-(iii) Continuing to conduct outreach and education on GSI to general public, planning and design professionals, appropriate municipal staff, and elected officials.	No		X	X		7/1/2022		

Provision C.4. Industrial and Commercial Site Controls

Sub-Provision Name	Task	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Legal Authority for Effective Site Management	i. Maintain ordinances to ensure that they have the regulatory authority to effectively 1) inspect; 2) require effective stormwater pollutant abatement and/or BMPs; 3) respond to violations and levy citations or fines; and 3) impose more substantial civil or criminal sanctions.	No			X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	i. Continue to update and implement Business Inspection Plan including prioritization of facilities, types/contents of inspections, frequencies.	No			X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	ii.(1) Prioritize commercial and industrial facilities with the functional aspects and types described in the provision, and other facilities identified by the Permittees as reasonably likely to contribute to pollution of stormwater runoff for inspection on the basis of the potential for water quality impact using criteria such as pollutant sources on site, use of pollutants of concern, proximity to a waterbody, and the enforcement history of potential discharges and actual discharges at the facility. Permittees may use a variety of sources to develop and update the business inspection prioritization, including, but not limited to, business license applications, tax records, and inspectors' observations.	Yes	Added the following: C.4.b.ii.(1) - sources to develop and update business inspection prioritizations. C.4.b.ii.(1)(a) - Added "outdoor waste handling and "fueling areas" to the list of sites with functions and facilities that may be sources of pollutants when exposed to stormwater. C.4.b.ii.(1)(b) - Added "restaurants and other food service businesses at which food is prepared or that have onsite eating and drinking areas for customers" and " supermarkets or large grocery stores with outdoor waste storage or cardboard compacting areas" to the list of sites that support industrial and commercial activities that have a reasonable likelihood to be sources of pollutants to stormwater and non-stormwater discharge	A	X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	ii.(2). Annually update Business Inspection Plan. Maintain a list of industrial and commercial facilities to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.	Yes	Added the following to Business Inspection Plan: C.4.b.ii.(2)(f) - Include list of the entities and their responsibilities, if rely on multiple entities to perform inspections. Describe how the Permittee oversees and coordinates the entities performing inspections and assures that all sites with the potential to pollute stormwater are inspected.	A	X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	ii.(3). Maintain facility/inspection database.	Yes	Added the following fields to the database: -- SIC or NAICS code -- use of mobile businesses for outdoor fueling, washing to the example description list		X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	Inspect commercial and industrial facilities, as required.	No			X		7/1/2022		
Industrial and Commercial Business Inspection Plan (Inspection Plan)	iii.(1) Report description of which entity(ies) are responsible for reviewing and approving business license applications or a link to the website for business license applications.	New			X		7/1/2022	9/30/2023	N
Industrial and Commercial Business Inspection Plan (Inspection Plan)	iii.(2) Provide list of industrial/commercial facilities to Water Board only upon request	Yes	Annual reporting not required		X				
Enforcement Response Plan	i. Implement and update Enforcement Response Plan (ERP). Track repeat offenses.	Yes	1) Added "lack of emergency response plans" as an example field scenario under Enforcement Tools and Field Scenarios. 2) Includes a provision that Permittees may contact and coordinate with Water Board staff for joint inspections and parallel enforcement of large, complex, or noncompliant sites.		X		7/1/2022		
Enforcement Response Plan	ii.(3) Maintain adequate records of inspections and follow-up enforcement responses for facilities.	Yes	Include expected time frame for compliance with recorded rationale for actual/potential discharges still considered corrected in a timely manner.		X		7/1/2022		
Inspections	ii.(1) Conduct inspections as required in C.4.b and ERP. Include important observations and verification of coverage under Industrial General Permit, if applicable.	Yes	Added requirement for inspectors to observe for evidence of unauthorized or illicit discharges, illicit connections, and potential discharge of pollutants to stormwater by the Discharger or contractors, such as mobile businesses.		X		7/1/2022		
Inspections	ii.(2) Maintain electronic database containing inspection information. Make available to Water Board during inspections and audits.	No			X		7/2/2022		
Inspections	ii. Report: (a) Number of inspections conducted; (b) Number of each type of enforcement action, as listed in each Permittee's ERP, issued; (c) Number of enforcement actions, or discrete number of potential and actual discharges fully resolved within 10 working days or otherwise deemed resolved in a longer, but still timely manner; and (d) Frequency of potential and actual non-stormwater discharges by business category.	No			X		7/1/2022	9/30/2022	Y
Inspections	Make the list of facilities required to have coverage under the Industrial General Permit, but that have not filed for coverage, available upon Water Board request. For facilities added to the list or re-inspected during this Permit term, the list shall include the date when the facility was first identified and the date when it was most recently inspected or evaluated.	Yes	Annual reporting not required but list must now include date when facility was first identified and most recently inspected		X		7/1/2022		
Staff Training	i-ii. Provide focused training for inspectors.	No		X	A		7/1/2022		
Staff Training	iii. Report on training in Annual Report.	No		X	X		7/1/2022		Y

Provision C.5. Illicit Discharge Detection and Elimination

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date:	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Legal Authority	ii. Maintain legal authority to prohibit and control Illicit discharges and implement progressively stricter enforcement to achieve expedient compliance.	Yes	1) C.5.a.ii.(1)(a) includes "trash, or other potentially polluting or hazardous materials" 2) C.5.a.ii.(4) new requirement to "Have adequate legal authority to hold mobile businesses, and the businesses, property managers, property owners, and other associated entities that hire a mobile business, responsible for stormwater pollution discharged by the mobile business operating at their location."		X		7/1/2022		
Enforcement Response Plan	i-ii. Maintain and update ERP as needed.	Yes	1) Added "lack of emergency response plans" as an example field scenario under Enforcement Tools and Field Scenarios. 2) Must include expected time frame for compliance with recorded rationale for actual/potential discharges still considered corrected in a timely manner. 3) New Referral and Coordination with Other Agencies requirements		X		7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(1) Establish central contact point, including phone numbers for complaints and spill reporting. Include, as feasible, a user-friendly web address for reporting for spills and dumping or a link to a web-based reporting application	No			X		7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(2) Publicize to staff and public the phone number on website, and if used, a web reporting address or link to a web-based reporting application. Update annually contact information on website, when changed. The central contact point shall be readily searchable and accessible on the Permittee's website	No					7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(3) Require municipal staff conducting routine maintenance and inspection activities to report illicit discharges found during their activities.	No					7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(4) Maintain and update, as needed, a spill/dumping response flow chart and phone tree or list identifying staff/positions responsible for receiving complaints and investigating/abating complaints.	No					7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(5) Maintain and update, as needed, a spill/dumping response flow chart and phone tree or list for various responsible agencies and their contacts who would be involved in response that goes beyond Permittee's immediate capabilities.	No		X			7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(6) Conduct reactive inspections in response to complaints and follow-up inspections as needed.	Yes	New requirement to start investigation within 3 business days		X		7/1/2022		
Spill, Dumping, and Complaint Response Program	ii.(6) Report the spill and dumping complaint phone number/web address, screen shot of website, and discussion of how it is publicized and copies of phone trees and contact lists	Yes	New requirement to submit phone trees and contact lists	A	X			9/30/2024 and 9/30/2026	N
Tracking and Case Follow-up	ii. Maintain system for water quality and dumping complaint tracking and follow-up database system.	Yes	New data that must be tracked: 1) Date and time response to illegal dumping report or complaint started; 2) Agency, department, or other entities responding to the complaint or discharge; 3) Identify the entered storm drain or approximate location and/or receiving water		X		7/1/2022		
Tracking and Case Follow-up	iii. Report a cases/investigations conducted including types of violations and enforcement actions, through problem resolution as set forth in the Annual Report Template.	No		A	X			9/30/2022	Y
Control of Mobile Sources	ii. Implement IIDE plan (BMPs, outreach, inventories, inspections, etc. as required in MRP) and report changes to illicit discharge control plan in each Annual Report.	Yes	Graffiti removal added to example mobile business list. Inventory must be updated at least annually.		X		7/1/2022		
Control of Mobile Sources	iii. Provide specific BMP minimum standards and enforcement strategy and outreach as required in C.5.e.iii in 2026 Annual Report.	Yes	Added a requirement to list and summarize specific outreach events and education conducted for each type of mobile business operating within the Permittee's jurisdiction;	A	X			9/30/2026	N
Control of Mobile Sources	iii. In each Annual Report, include at least the following: (a) The total number of inspections conducted of mobile businesses; (b) The number of each type of mobile business inspected; and (c) A summary of the enforcement actions taken against mobile businesses during the reporting year.	New		A	X			9/30/2023	Y
Municipal Separate Storm Sewer System (MS4) Map	ii.(1). Make current maps of the MS4 publicly available.	No			X		7/1/2022		
Municipal Separate Storm Sewer System (MS4) Map	ii.(1). Identify information missing from the current MS4 maps and develop a plan and schedule to compile additional storm sewer system information, considering the potential to identify component locations, size or specifications, materials of construction, and condition.	New		A	X		7/1/2023		
Municipal Separate Storm Sewer System (MS4) Map	iii.(1). Report how MS4 maps are made available to the public and publicized.	No		A	X		7/1/2023	9/202024	N

Provision C.6. Construction Site Control

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Legal Authority for Effective Site Management	1. If not already established, establish legal authority to impose fines and/or stop work at construction sites.	No			X		7/1/2022		
Legal Authority for Effective Site Management	1. Implement and update the Enforcement Response Plan (ERP) that ensures effective site management by operators.	No							
Enforcement Response Plan (ERP)		Yes	1) Added "lack of emergency response plans" as an example field scenario under Enforcement Tools and Field Scenarios. 2) include expected time frame for compliance with recorded rationale for actual/potential discharges still considered corrected in a timely manner. 3) new Referral and Coordination with Other Agencies section required		X		7/1/2022		
Best Management Practices Category	1. Designate a minimum set of BMPs and other measures to be implemented by construction site operators/developers at construction sites. Permittees may select site-specific BMPs, or BMP combinations, from resources such as: 1.CASQA BMP Handbook, Construction, December 2019 2. Caltrans Stormwater Quality Handbooks, Construction Site Best Management Practices Manual, May 2017, and addenda 3.Other BMPs shown to provide equivalent or better protection	No			X		7/1/2022		
Plan Approval Process	1. Review erosion control plans for consistency with local minimum required management practices.	Yes	Minor - If SWPPPs do not include erosion control plan drawings for use by construction workers and managers at the site, erosion, sediment, and site control plans and drawings must also be submitted and reviewed.		X		7/1/2022		
Plan Approval Process	2. For sites disturbing one acre or more of soil, verify that the site operators/developers have filed a Notice of Intent for permit coverage under the Construction General Permit	No			X		7/1/2022		
Plan Approval Process	3. Provide construction stormwater management educational materials to site operators/developers, as appropriate	No		A	X		7/1/2022		
Inspections	1. By September 1 of each year, remind all site developers and/or owners disturbing one acre or more of soil, hillside projects, and high priority sites to prepare for the upcoming wet season.	No			X		7/1/2022		
Inspections	2. Conduct monthly inspections during the wet season at the following sites: (a) All construction sites disturbing one or more acre of land; (b) All hillside projects(based on the Permittee's map of hillside development areas or criteria, or if the Permittee does not have a map of hillside development areas or criteria, those projects on sites with ≥15 percent slope) disturbing greater than or equal to 5,000 square feet; and (c) High Priority Sites – Other sites determined by the Permittee or the Water Board as significant threats to water quality. In evaluating threat to water quality	No			X		7/1/2022		
Inspections	3. Focus inspections on adequacy and effectiveness of site-specific BMPs.	No		A	X		7/1/2022		
Inspections	4. Track data in electronic database or tabular system	Yes	Minor - Added requirement to include the following in the tracking system: the department, agency, or other entity performing the inspection		X		7/1/2022		
Inspections	Report: (a) Total number of construction sites requiring inspections during at least part of the Permit year. (b) Total number of active hillside sites disturbing less than one acre of soil requiring inspection; (c) Total number of active sites disturbing one acre or more of soil; (d) Total number of active sites disturbing less than one acre of soil identified as High Priority sites in Provision C.6.e.i.(2)(c) requiring inspections; (e) Total number of inspections conducted; (f) Number of enforcement actions taken by type, organized by the categories in each Permittee's ERP; (g) Number of illicit discharges, actual and suspected, of sediment or other construction-related materials; (h) Number of enforcement actions or discrete number of potential and actual discharges fully corrected prior to the next rain event, but no longer than 10 business days after the potential and actual discharges*** are discovered or otherwise considered corrected in a timely, though longer period. ***Permittees who track by discrete potential and actual discharges shall report by discrete discharges. Permittees who track by enforcement actions shall report by enforcement actions	Yes	Added requirement to report total number of construction sites requiring inspections during at least part of the Permit year		X		9/1/2022 (except new requirement in AR on 9/1/2023)	Y	

Provision C.6. Construction Site Control

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Inspections	In the 2027 Annual Report, evaluate electronic database or tabular format and the summaries produced. Include findings on the program's strength, comparison to previous years' results, as well as areas that need more focused education for site owners, operators, and developers the following year.	No			X		7/1/2026	9/1/2027	N
Inspections	Make available electronic copy of the construction site and inspection database(s) to the Water Board during inspections, audits, or upon request.	No			X				
Staff Training	1. Provide training at least every other year to staff responsible for conducting construction site stormwater inspections. Training topics shall include information on correct uses of specific BMPs, proper installation and maintenance of BMPs, Permit requirements, local requirements, and the ERP.	No		X	A		7/1/2022		
Staff Training	2. Report: 1) Dates of training; 2) training topics covered; 3) total number of inspectors, including both municipal and non-municipal staff; and 4) number of inspectors attending each training, including municipal and non-municipal staff. If there was no training in that year, so state.	Yes	Added requirement to report total number of inspectors that are not municipal staff and if they received training	A	X			9/1/2023	Y

Provision C.7. Public Information and Outreach

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Outreach Campaigns	1. Participate in or contribute to an advertising campaign with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target audience. At least one advertising campaign/media campaign must be conducted, with a specific stormwater pollution prevention message. Conduct timely evaluations to measure the effectiveness.	No		X	A		7/1/2022		
Stormwater Pollution Prevention Education	1. Individually or collectively create and maintain a point of contact (e.g., phone number or website) to provide the public with information on watershed characteristics and stormwater pollution prevention alternatives. Co-permittees - maintain current point of contact.	No		X	X		7/1/2022		
Public Outreach and Citizen Involvement	1. Participate in and/or host events (e.g., community events, street fairs and farmers markets) to reach a broad spectrum of the community with both general and specific stormwater runoff pollution prevention messages. Co-permittees must do some individual events (can take credit for Program events, for up to half of their required events).	No		X	X		7/1/2022		
Watershed Stewardship Collaborative	1. Individually or collectively encourage and support watershed stewardship collaborative efforts of community groups (e.g., the Contra Costa Watershed Forum, the Santa Clara Basin Watershed Management Initiative, and "friends of creek" groups). If no such organizations exist, encourage and support development of grassroots watershed groups or engagement of an existing group (e.g., a neighborhood association) in watershed stewardship activities). Coordinate with existing groups to further stewardship efforts. Co-permittees - may continue to participate in and/or support the WMI and/or support other local creek groups or watershed councils.	No		X			7/1/2022		

Provision C.7. Public Information and Outreach

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
School-Age Children Outreach	1. Individually or collectively implement outreach activities designed to change specific behaviors and/or increase awareness in school-age children (K through 12), with the objective of significantly increasing their overall awareness of stormwater and/or watershed message(s) and to cause behavior change(s).	No		X	X		7/1/2022		
Outreach to Municipal Officials	1. Conduct outreach to municipal officials.	No		X	X				

Sort	Sub-Provision	Sub-Provision Name	Tasks	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)	Comments
				Change	Notes	Program	Co-permittee	Regional				
1	C.8.d	Low Impact Development (LID) Monitoring	i.(1) The Permittees shall, at the regional or countywide level, develop LID Monitoring Plans to implement the requirements in Provision C.8.d.iii-iv. The LID Monitoring Plans shall, at a minimum: (a) Explain how the study(s) will address both management questions; (b) Describe the LID facility(s) or system(s) and study area(s); (c) List the monitoring stations, monitoring parameters, and associated measurement, sample and analytical methods that will be utilized; (d) Establish a monitoring schedule; (e) Describe the data evaluation methods, (f) Include study-specific Quality Assurance Project Plans (QAPPs); (g) Provide annual cost estimates for the implementation of the LID Monitoring Plan; (h) Explain how sampling and analytical methodologies will be regionally consistent. ii. The Permittees shall submit their draft LID Monitoring Plans to the TAG by March 1, 2023.	New		X		X		3/1/2023	N	Draft LID Monitoring Plan to TAG
2	C.8.d	Low Impact Development (LID) Monitoring	ii. The Permittees shall form and convene a Technical Advisory Group (TAG) which includes impartial science advisors (e.g., SFEI, SCCWRP) and Water Board staff, to review and make recommendations regarding the LID Monitoring Plans (including their study design, analysis methods, results, and conclusions) prior to submission of the LID Monitoring Plans to the Executive Officer.	New		X		X	7/1/2022			Annual LID TAG Meetings Prior to the Executive Officer's approval or conditional approval of the LID Monitoring Plans, the TAG shall be convened at least biannually. Thereafter, it shall be convened at least annually to provide continued feedback.
3	C.8.d	Low Impact Development (LID) Monitoring	iv.(1) Permittees shall conduct LID Monitoring consistent with the parameters and intensities specified in Table 8.d.2.	New		X			10/1/2023			Annual LID Monitoring (Frequency) starting in WY2024
4	C.8.d	Low Impact Development (LID) Monitoring	iv.(1) Permittees shall conduct LID Monitoring consistent with the parameters and intensities specified in Table 8.d.2. Each flow-weighted composite must be analyzed for all of the required parameters. Data must be SWAMP comparable. Parameters Required: Total Hg, Total PCBs, TSS, PFAS, TPH, total and dissolved copper, flow, total hardness, and pH. Parameters Optional: other emerging contaminants and ancillary parameters.	New		X			10/1/2023			Annual LID Monitoring (Parameters) starting in WY2024
5	C.8.d	Low Impact Development (LID) Monitoring	vi. The Permittees shall submit their LID Monitoring Plans for Executive Officer approval by May 1, 2023.	New		X		X		5/1/2023	N	Final LID Monitoring Plan for EO approval
6	C.8.e	Trash Monitoring	ii. (1) Permittees shall collect and analyze the amount of trash discharged from MS4 outfalls that drain tributary drainage areas controlled to the Low trash generation level, during storm events that will (or that Permittees estimate are likely to) result in discharges of trash through the MS4 system.	New		X			10/1/2023			Annual Trash Outfall Monitoring starting in WY2024
7	C.8.e	Trash Monitoring	ii. (2) Permittees shall implement a pilot program to directly (in-stream) sample sections of receiving waters that receive runoff primarily from MS4 outfalls that drain tributary drainage areas controlled to the Low trash generation level, during storm events that will (or that Permittees estimate are likely to) result in discharges of trash through the MS4 system.	New		X		X	10/1/2024			Annual Trash In-Stream Monitoring starting in WY2025
8	C.8.e	Trash Monitoring	iv.(1) The Permittees shall form and convene a Technical Advisory Group (TAG), which includes impartial science advisors (e.g., SFEI) and Water Board staff, to review and provide input on ongoing trash monitoring, site selection, analysis methods, results, and conclusions.	New		X		X	7/1/2023			Annual Trash TAG Meetings Prior to the submission of the Trash Monitoring Plan, the TAG shall meet at least biannually. Subsequent to the submission of the Trash Monitoring Plan, the TAG shall meet at least annually.
9	C.8.e	Trash Monitoring	v. Trash Monitoring Plan - Permittees shall collectively submit a Trash Monitoring Plan by July 31, 2023, subject to Executive Officer approval, that, at a minimum, includes the following information: (1) Selected site locations; (2) description of the land use, trash conditions/levels, trash controls present, and other relevant characteristics and also delineate the tributary drainage areas of the MS4; (3) A description of factors that were considered when selecting monitoring sites; (4) description of the monitoring methods and protocols; (5) monitoring schedule; (6) plans for implementation of Provision C.8.e.iii.(8); (7) summary of permitting efforts; (8) opportunities provided for input and participation by interested parties and scientific experts other than those participating in the TAG; and (9) input, feedback, and recommendations from the TAG on the capacity of the trash Monitoring Plan to answer the management and monitoring questions.	New		X		X		7/31/2023	N	Trash Monitoring Plan for EO Approval

10	C.8.f	Pollutants of Concern Monitoring	ii. Parameters and Monitoring Frequency (Yes	Permit totals for PCBs, mercury, and copper have been reduced. Effort for emerging contaminants can be satisfied either through sampling and analysis of the number of samples indicated in this table or through augmentation of the San Francisco Bay Regional Monitoring Program Emerging Contaminants Monitoring Strategy in the amount of \$100,000 per year for all Permittees combined.	X			10/1/2022			Annual POC Monitoring
11	C.8.f	Pollutants of Concern Monitoring	ii. Parameters and Monitoring Frequency Receiving Water Limits Assessment (copper, zinc, fecal indicator bacteria, and additional analytes determined under Provision C.8.h.iv): 4 wet season samples and 1 dry season sample	New		X			10/1/2023			Annual POC RWL Monitoring
12	C.8.g	Pesticides and Toxicity Monitoring	i. Toxicity in the Water Column - Dry Weather (1) Field and Laboratory Method - Fathead minnow, freshwater crustacean, green algae, freshwater amphipod, midge (3) Frequency, Timeframe and Number of Sites – Permittees shall annually collect in the dry season at least the minimum number of samples as shown below.	No		X			10/1/2022			Annual Toxicity Monitoring - Water Column Dry Weather
13	C.8.g	Pesticides and Toxicity Monitoring	ii. Toxicity, Pesticides in Sediment - Dry Weather (1) Field and Laboratory Method - Hyalella azteca and Chironomus dilutus survival; pyrethroids, fipronil and its degradates; Total PAHs, Metals (arsenic, cadmium, chromium, copper, lead, nickel, zinc); TOC, grain size (4) Frequency, Timeframe and Number of Sites – Permittees shall annually collect in the dry season at least the minimum number of samples as shown below.	Yes	Carbaryl not required in MRP 3.0; Fipronil degradates are required in MRP 3.0	X			10/1/2022			Annual Pesticides and Toxicity Monitoring - Sediment Dry Weather
14	C.8.g	Pesticides and Toxicity Monitoring	iii. Toxicity, Pesticides - Wet Weather (1) Field and Laboratory Method - Pyrethroids; Imidacloprid, fipronil and its degradates, toxicity (3) Frequency, Timeframe and Number of Sites – If this (Provision C.8.g.iii) sampling is conducted by the RMC on behalf of all Permittees, a total often (10) samples shall be collected over the Permit term, with a minimum of six (6) samples collected by the end of the third water year of the permit term. If this (Provision C.8.g.iii) sampling is conducted by Countywide Stormwater Programs, Permittees shall collect at least the minimum number of samples as shown below.	Yes	Indoxacarb not required in MRP 3.0; Fipronil degradates are required in MRP 3.0	X		X	10/1/2022			Annual Pesticides and Toxicity Monitoring - Sediment Dry Weather
15	C.8.h	Reporting	ii. Electronic Reporting - The Permittees shall submit to the California Environmental Data Exchange Network (CEDEN) all results from monitoring conducted pursuant to Provisions C.8.d LID Monitoring, C.8.e Trash Monitoring, C.8.f Pollutants of Concern Monitoring, and C.8.g Pesticides and toxicity Monitoring. Data that CEDEN cannot accept are exempt from this requirement. (1) Data shall be submitted in SWAMP formats and with the quality controls required by CEDEN. (2) Data collected during the previous October 1–September 30 period shall be submitted by March 31 of each year.	Yes	Need to submit LID and Trash Monitoring Data	X				3/31/2023	Y	Annual Electronic Data Submission
16	C.8.h	Reporting	iii. Urban Creeks Monitoring Report – The Permittees shall submit a comprehensive Urban Creeks Monitoring Report at the countywide level no later than March 31 of each year, reporting on all data collected during the foregoing October 1–September 30 period. Each Urban Creeks Monitoring Report shall contain summaries of C.8.d LID Monitoring, C.8.e Trash Monitoring, C.8.f Pollutants of Concern Monitoring, and C.8.g Pesticides and Toxicity Monitoring	Yes	Need to report on LID and Trash Monitoring	X				3/31/2023	Y	Annual UCMR (Note, only POCs and P&T in March 2023 and 2024)
17	C.8.h	Reporting	iii.(1) LID Monitoring Status Report	New		X		X		3/31/2025	Y	LID Monitoring Status Report
18	C.8.h	Reporting	iii.(2) Annual Trash Monitoring Progress Report	New		X		X		3/31/2025	Y	The Annual Trash Monitoring Progress Report shall be a single collective regionwide report. With their UCMRs, all Permittees shall include a copy of the Annual Trash Monitoring Progress Report.
19	C.8.h	Reporting	iv.(1) The Permittees shall submit a report describing the allocation of sampling effort for POC monitoring for the forthcoming year (i.e., the water year that began October 1 of that year) and what was accomplished for POC monitoring during the preceding water year. The report shall include (for preceding year and projected for forthcoming year): monitoring locations, number and types of samples collected, purpose of sampling (management question addressed), and analytes measured. Any data not reportable to CEDEN should also be included in the Urban Creeks Monitoring Report due annually on March 31.	Yes	POCs Monitoring Plan now submitted with the UCMR (it used to be submitted in the Fall)	X				3/31/2023	Y	POCs Monitoring Plan

If desired we can add a tab with each programs sample metrics.

20	C.8.h	Reporting	iv.(2) Receiving Water Limitations Assessment Report - By no later than March 31, 2023, Permittees shall submit a report with the following information: (i) Relevant water quality objectives against which to compare monitoring data; (ii) Analytes in addition to those listed in Table 8.2 to monitor based on assessment of the potential that discharges of these analytes may result in levels in receiving waters approaching or exceeding water quality objectives and the basis of the determination; and (iii) Identification of waterbodies to be sampled, sampling locations within those waterbodies, and sampling schedule consistent with the requirements in Tables 8.1 and 8.2.	New		X		X		3/31/2023	N	RWL Assessment Report
21	C.8.h	Reporting	iv.(2)(c) By no later than March 31, 2026, or as part of the Integrated Monitoring Report, Permittees shall submit an updated Receiving Water Limitations Assessment Report with proposed monitoring to be conducted during the next permit term.	New		X				3/31/2026	N	Updated RWL Assessment Report
22	C.8.h	Reporting	v. Integrated Monitoring Report - By no later than March 31, 2026, Permittees shall submit an Integrated Monitoring Report in lieu of the annual Urban Creeks Monitoring Report. This report will be part of the next Report of Waste Discharge for the reissuance of this Permit. The Integrated Monitoring Report shall report on all the data collected since the previous Integrated Monitoring Report (excluding Creek Status)	Yes	Includes LID and Trash Monitoring and budget summary of each monitoring requirement.	X		X		3/31/2026	N	Integrated Monitoring Report
23	C.8.h	Reporting	vi. Comprehensive Bioassessment Final Report – By no later than March 31,2024, the Permittees shall collectively submit a comprehensive analysis of all bioassessment monitoring conducted by the RMC during MRP 1 and MRP 2, for Water Years 2012-2021.	New		X		X		3/31/2024	N	Comprehensive Bioassessment Final Report

Provision C.9. Pesticides Toxicity Control

Sub-Provision Name	Tasks	Change from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Co-permittee	Regional			
Maintain and Implement	1. Maintain and implement IPM policies or ordinances and update as needed.	No			X		7/1/2022		
Maintain and Implement	2. Require municipal employees and contractors to adhere to the standard operating procedures.	No			X		7/1/2022		
Maintain and Implement	3. Report on IPM policy implementation and evaluate effectiveness and status and trends of quantity and type of pesticide use, and provide reasons for increases in use of pesticides that threaten water quality.	No			X			9/30/2022	Y
Maintain and Implement	4. Report trends and quantities of pesticide active ingredient usage.	Yes	New pesticides of concern added		X		7/1/2022	9/30/2022 (except new pesticide of concern on 9/30/2023)	Y
Maintain and Implement	5. Provide brief description of two IPM tactics or strategies implemented in the reporting year.	No			X			9/30/2022	Y
Maintain and Implement	6. Submit links to IPM ordinances or policies to the Water Board and IPM standard operating procedures. Submit updated links as needed.	Yes	Minor - links instead of e-copies required		X		7/1/2022	9/30/2022	N
Train Municipal Employees	1. Ensure that all municipal employees who, within the scope of their duties, apply pesticides which threaten water quality (including over-the-counter pesticides) are appropriately oriented and/or trained in IPM practices and the Permittee's IPM policy.	No		A	X	A		9/30/2022	
Train Municipal Employees	2. Report percentage of municipal employees who apply pesticides who have been trained in IPM policy and IPM standard operating procedures.	No			X			9/30/2022	Y
Train Municipal Employees	3. Submit training materials to Water Board.	No			X			9/30/2022	Y
Require Contractors	1. Permittees shall hire IPM-certified contractors or include contract specifications requiring contractors to implement IPM. Observe pesticide applications to verify IPM is used. Evaluate lists of pesticides and amounts of active ingredient used.	No		A	X				
Require Contractors	2. Describe compliance in each Annual Report.	No		A	X			9/30/2022	Y
Interface with County	1. Maintain regular communications with county agricultural commissioners to get input and assistance on urban pest management practices and use of pesticides.	No		A	X				
Interface with County	2. Report violations of pesticides regulations associated with stormwater management to county agricultural commissioners (or other appropriate State and/or local agencies).	No			X				
Interface with County	3. Report on communications and on follow-up actions to correct violations in Annual Reports.	No			X			9/30/2022	Y
Public Outreach	1. Conduct outreach to consumers at the point of purchase. Participate in and provide resources for the "Our Water, Our World" program or a functionally equivalent pesticide use reduction outreach program.	No		X			7/1/2022		
Public Outreach	2. Conduct outreach to residents who use or contract for structural or landscape pest control . A) explain links between pesticide use and water quality. B) information about IPM in structural pest management certification programs and landscape professional trainings. C) tips for hiring professionals.	No		X	A		7/1/2022		
Public Outreach	3. Conduct outreach to pest control operators (PCOs) and landscapers. Work with DPR, county agricultural commissioners, UC-IPM, BAMSC, Urban Pesticide Committee, EcoWise Certified Program, Bio-Integral Resource Center and others to promote IPM to PCOs and landscapers.	No		X			7/1/2022		
Public Outreach	4. Report activities completed, quantity of outreach materials distributed, number of attendees at trainings/workshops. Document and report any measurable awareness and behavior changes resulting from outreach. (consumers)	No		X				9/30/2022	Y
Public Outreach	5. Document effectiveness of these actions to the Water Board. This documentation may include percentages of residents hiring certified IPM providers and the change in this percentage. (residents who use/ hire)	No		X				9/30/2022	Y
Public Outreach	6. Document percentages of PCOs and landscapers reached and reductions in reported pesticide use. (pest control operators)	No		X				9/30/2022	Y
Track and Participate	1. Track and participate in relevant regulatory processes (may be done jointly with other Permittees, such as through CASQA or BAMSC. These may include: USEPA pesticide evaluation and registration activities; and California Department of Pesticide Regulation (DPR) pesticide evaluation activities. In addition, submit information and comments letters to USEPA and California DPR reregistration, as appropriate.	No		X			7/1/2022		
Track and Participate	2. List participation efforts, information submitted and how regulatory actions were affected in each Annual Report.	No		X				9/30/2022	Y
Evaluate Implementation	1. Evaluate the effectiveness of the pesticide control measures implemented by their staff and contractors, evaluate attainment of pesticide concentration and toxicity targets for water and sediment from monitoring data (collected by Permittees, research agencies, and/or State agencies), and identify additions and/or improvements to existing control measures needed to attain targets, with an implementation time schedule.	No		X			7/1/2022		
Evaluate Implementation	2. Report evaluation results to Water Board in 2025 Annual Reports. Include discussion of any improvements made in these efforts in the preceding five years and any changes in water quality regarding pesticide toxicity in urban creeks. Include area of focus for subsequent permit term.	No		X			7/1/2024	9/30/2025	N

Provision C.10. Trash Reduction

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Trash Reduction Requirements	i. Implement trash load reduction control actions. Demonstrate attainment of trash discharge reduction requirements of 90% by June 30, 2023; and 100% trash load reduction or no adverse impact to receiving waters from trash by June 30, 2025.	Yes	90% benchmark added and 100% benchmark extended to June 30, 2025.		X		7/1/2022		
Trash Reduction Requirements	i. If 90% benchmark is not attained by June 30, 2023, submit revised trash load reduction plan and implementation schedule of additional trash load reduction control actions to achieve 90% and 100% benchmarks by September 30, 2023.	Yes		A	X		7/1/2022	9/30/2023	N
Trash Reduction Requirements	ii. Submit revised Trash Generation Area Map by September 30, 2024 that includes trash management areas, private land drainage areas (See Provision C.10.a.ii.b) that will be retrofitted with full trash capture devices, or equivalent, by June 30, 2025 compliance date.	Yes		A	X			9/30/2024	N
Trash Reduction Requirements	ii. Ensure that private lands that are moderate, high, or very high trash generating, and that drain to storm drain inlets that Permittees do not own or operate (private), but that are plumbed to Permittees' storm drain systems are equipped with full trash capture systems or are managed with trash discharge control actions equivalent to or better than full trash capture systems by July 1, 2025.	Yes			X		7/1/2022		
Demonstration of Trash Reduction Outcomes	i. Install and/or maintain mandatory minimum full capture systems to standards. Provide for inspection and review upon request, documentation of the design, operation, and maintenance of each full trash capture system, including the mapped location and drainage area served by each system.	No			X		7/1/2022		
Demonstration of Trash Reduction Outcomes	i. Provide Vector Control with the names and locations of new and existing full trash capture devices starting with the 2023 Annual Report.	Yes		A	X		7/1/2022	9/30/2023	Y
Demonstration of Trash Reduction Outcomes	ii. Report on maintenance records in Annual Reports.	No			X		7/1/2022	9/30/2022	Y
Demonstration of Trash Reduction Outcomes	ii. Certify that each full capture system is operated and maintained to meet full trash capture system requirements.	No			X		7/1/2022		
Demonstration of Trash Reduction Outcomes	iii. Maintain documentation of other (non-FC) trash control actions. Include verification of each action.	No		X	A		7/1/2022		
Demonstration of Trash Reduction Outcomes	iii. Perform assessments of other action(s) that verifies effectiveness and maintain documentation of assessments.	No		X	A		7/1/2022		
Demonstration of Trash Reduction Outcomes	iii. Maintain implementation documentation for other trash control actions including level, timing, frequency, SOPs, locations, tracking and enforcement, etc.	No		X	A		7/1/2022		
Demonstration of Trash Reduction Outcomes	iii. Perform Visual Assessment of outcomes of other trash management actions to extent described in C.10.b.	No		X	A		7/1/2022		
Demonstration of Trash Reduction Outcomes	v. Permittees may take credit for jurisdiction-wide actions to reduce trash at the source, particularly persistent trash items other than those addressed under previous Permits (foam foodware and single-use plastic bags) . The credit may be valued toward trash load reduction compliance by up to ten percent load reduction total for all such actions.	Yes			X				
Demonstration of Trash Reduction Outcomes	v. Provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and reduce trash by the claimed value.	Yes			X				
Demonstration of Trash Reduction Outcomes	v. Demonstrate and claim full trash capture equivalence of a source control in specific trash generation areas or in combination with other controls in an area if the control or combination of controls are documented, assessed, and verified in accordance with Provision C.10.b.iii. A jurisdiction-wide source control load reduction value cannot be claimed after June 30, 2025.	Yes			X				
Requirements for Flood Management Agencies	Flood Control Agencies Only: Implement trash control measures such as trash pickups and installation of trash receptacles, to control Moderate, High, and Very High trash generation areas within their jurisdiction including, but not limited to, parking lots, trailhead areas, and along recreational paths and trails, and demonstrate effectiveness of these trash control measures as specified in Provision C.10.b.iii.	Yes			X		7/1/2022		
Requirements for Flood Management Agencies	Flood Control Agencies Only: Continue to implement trash booms or outfall capture devices or equivalent measures.	No			X				
Trash Load Reduction Plans	i. Maintain, and provide for inspection and review upon request, a Trash Load Reduction Plan, including an implementation schedule to meet the Provision C.10.a Trash Load Reduction requirements	No		A	X				
Trash Load Reduction Plans	ii. If unable to meet the 90 percent mandatory trash reduction compliance benchmark without offsets described in Provision C.10.f, submit updated Trash Load Reduction Plan with the 2023 Annual Report.	Yes		A	X			9/30/2023	N
Trash Load Reduction Plans	ii. If unable to attain the 100 percent mandatory trash reduction compliance benchmark by June 30, 2025, while accounting for credits from new source controls (as described in Provision C.10.b.v). Permittees may be granted additional time until December 31, 2025, to achieve 100 reduction via full trash capture, or equivalent. This is contingent on developing and implementing a direct discharge control plan (DDCP) as described in Provision C.10.f.iii.	Yes		A	X				
Impracticability Report	Collectively develop a Trash Impracticability Report that includes a process for both evaluating impracticability and implementing partial benefit actions to the maximum extent practicable by March 31, 2023.	Yes		X	A			3/31/2023	N
Impracticability Report	iv. Use an approved trash impracticability report in developing the updated Trash Load Reduction Work Plans required by Provision C.10.d.	Yes		A	20		6/30/2023	9/30/2023	
Optional Trash Load Reduction Offset Opportunities	i. Permittees may claim offsets for creek and shoreline cleanups per C.10.f. standards. Offsets for creek and shoreline cleanups will no longer be applicable after June 30, 2025.	No		A	X			9/30/2022	Y
Optional Trash Load Reduction Offset Opportunities	ii. Permittees may claim offsets for direct discharge controls per C.10.f. standards: Offsets for direct discharge controls will no longer be applicable after June 30, 2025.	No		A	X			9/30/2022	Y
Optional Trash Load Reduction Offset Opportunities	ii. Permittees wishing to submit a new DDCP pursuant to Provision C.10.d.iii: Submit the DDCP for approval no later than April 1, 2024.	Yes		A	X			4/1/2024	N

Provision C.10. Trash Reduction

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Optional Trash Load Reduction Offset Opportunities	i. Permittees with an existing DDCP approved during the Previous Permit: Submit updated DDCP for approval no later than January 3, 2023 in order to continue claiming trash load percent reduction offsets.	Yes		A	X			1/3/2023	N
Reporting	i. Summarize trash control actions within each TMA including types, levels, areas, whether new or ongoing, and initiation date with each Annual Report.	No		A	X			9/30/2022	Y
Reporting	ii. Submit a revised trash generation area map or maps, as described in Provision C.10.a.ii. by September 30, 2024.	No		A	X			9/30/2024	N
Reporting	iii. Summarize implementation actions and progress toward meeting the July 1, 2025, requirement for all private lands to implement full trash capture systems, or be managed with trash discharge control actions equivalent to or better than full trash capture systems, as required in Provision C.10.a.ii.(b), starting with the 2023 Annual Report.	Yes		A	X			9/30/2023	Y
Reporting	iv. Certify that each full trash capture systems is operated and maintained to meet full trash capture system requirements including descriptions of any system(s) that did not meet full trash capture system requirements ; and any corrective actions taken with each Annual Report.	No		A	X			9/30/2022	Y
Reporting	v. Provide accounting of On-Land Assessments (or other evaluations of non-FC controls) including summary descriptions, number, and dates of observations with each Annual Report.	No		X	A			9/30/2022	Y
Reporting	vi. Submit a notice of noncompliance pursuant to Provision C.22.c. if unable to attain the 90 percent mandatory trash reduction compliance benchmark by June 30, 2023, via full trash capture, or equivalent.	Yes		A	X			6/30/2023	N
Reporting	vii. Submit a report evaluating their trash reduction, relative to 2009 baseline conditions, as of June 30, 2023, without including offsets. If unable to meet the 90 percent mandatory trash reduction compliance benchmark without offsets, submit updated Trash Load Reduction Plan as described in Provision C.10.d.ii. by September 30, 2023.	Yes		A	X			9/30/2023	N
Reporting	viii. Submit a notice of noncompliance pursuant to Provision C.22.c., if unable to attain the 100 percent mandatory trash reduction compliance benchmark by June 30, 2025, while accounting for credits from new source controls (as described in Provision C.10.b.v).	Yes		A	X			6/30/2025	N
Reporting	viii. If a Permittee is granted additional time until December 31, 2025, to attain 100 percent reduction via full trash capture, or equivalent, submit a report that confirms that they reached 100 percent trash load reduction, or a notice of noncompliance pursuant to Provision C.22.c. by December 31, 2025.	Yes		A	X			12/31/2025	N
Reporting	ix. Develop and submit a programmatic report for the approval of the Executive Officer, that describes conditions under which it is impracticable to control trash via full trash capture devices or equivalent actions by March 31, 2023.	Yes		X	X			3/31/2023	N
Reporting	x. Submit a summary of the additional cleanup actions implemented and the benefit to water quality achieved through those actions if Permittees offset part of their Provision C.10.a trash load percent reduction requirement through additional cleanup of creek and shoreline areas, as described in Provision C.10.f.i. by September 30, 2024.	Yes		A	X			9/30/2024	N
Reporting	xi. Permittees with approved Direct Discharge Control Plans that address significant discharges from unsheltered homeless populations and/or illegal dumping sites: Provide information for which they use an offset from the implementation of Provision C.10.f.ii towards their trash load percent reduction starting with the 2023 Annual Report.	Yes		A	X			9/30/2023	Y

Sort	Sub-Provisio	Sub-Provision Name	Flood Management Agency	Trash Capture Requirement
17	C.10.c	Requirements for Flood	Santa Clara Valley Water District	4 trash booms or 8 outfall capture devices (minimum 2 ft. diameter outfall) or equivalent measures
17	C.10.c	Requirements for Flood	Alameda County Flood Control Agency	3 trash booms or 6 outfall capture devices (minimum 2 ft. diameter outfall) or equivalent measures
17	C.10.c	Requirements for Flood	Alameda Co. Zone 7 Flood Control Agency	1 trash boom or 2 outfall capture devices (minimum 2 ft. diameter outfall) or equivalent measures
17	C.10.c	Requirements for Flood	Contra Costa County Flood Control Agency	2 trash booms or 4 outfall capture devices (minimum 2 ft. diameter outfall) or equivalent measures
17	C.10.c	Requirements for Flood	San Mateo County Flood and Sea Level Rise Resiliency District	1 trash boom or 2 outfall capture devices (minimum 2 ft. diameter outfall) or equivalent measures
17	C.10.c	Requirements for Flood	Vallejo Flood & Wastewater District	1 trash boom or 2 outfall capture devices or equivalent measures (minimum 2 ft. diameter outfall)

Provision C.11. Mercury Controls

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Assess Mercury Load	1. Implement an assessment methodology and data collection program to quantify, in a technically sound manner, mercury loads reduced through implementation of pollution prevention, source control, and treatment control, green stormwater infrastructure and other measures taken as part of the mercury control program defined by this provision. Use the assessment methodology to demonstrate the load reductions achieved during this Permit term as well as progress toward achieving the MRP program area mercury TMDL wasteload allocations.	No			X		7/1/2022		
Assess Mercury Load	2. Submit documentation annually confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.	New			X			9/30/2023	Y
Assess Mercury Load	3. Update this assessment methodology as necessary for use in the subsequent permit term.	No			X			9/30/2026	N
Assess Mercury Load	4. Report the total loads reduced using the assessment methodologies described and cited in the Fact Sheet to demonstrate cumulative mercury load reduced from each control measure implemented since the beginning of the Permit term. This report shall also include an estimate of load reductions from control measures taking place after the 2026 Annual Report submittal but before the end of the permit term. Permittees shall submit all supporting data and information necessary to substantiate the load reduction estimates.	No			X			9/30/2026	N
Program for Source	1. Investigate, using both conventional sampling and laboratory analysis techniques, land areas that likely contribute mercury to municipal separate storm sewer system (MS4s).	Yes	New, but continues similar work done under MRP 2.0	A	X		7/1/2022		
Program for Source	2. For those properties or land areas found to be contributing substantial amounts of mercury or where high mercury concentrations are found (generally areas with sediment concentrations greater than 0.5 mg Hg/kg), take action to abate the mercury sources into their MS4s or refer the properties to the Water Board for follow-up measures.	Yes	New, but continues similar work done under MRP 2.0	A	X		7/1/2022		
Program for Source	3. For each source property referred to the Water Board, implement interim enhanced operation and maintenance (enhanced O&M) measures in the street or storm drain infrastructure adjacent to the referred source property or implement a stormwater treatment system downstream of the property. These enhanced O&M measures shall be sufficient to intercept historically deposited contaminated sediment in the vicinity of the source area and prevent further contaminated sediment from being discharged from the source area to the storm drain system.	Yes	New, but continues similar work done under MRP 2.0	A	X		7/1/2022		
Program for Source	4. Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of the old industrial land use indicated above. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement, etc.).	Yes	New, but continues similar work done under MRP 2.0	X	X			9/30/2022	Y
Program for Source	5. Report annually on ongoing enhanced O&M activities associated with all past contaminated property referrals.	Yes	New, but continues similar work done under MRP 2.0	A	X			9/30/2022	Y
Program for Source	6. Prior to all new referrals, submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.	Yes	New, but continues similar work done under MRP 2.0	A	X			As Needed	N
Program for Source	7. Report as part of reporting under Provision C.11.a.iii(2) on total acreage of land area investigated, area and description of properties referred, description of enhanced O&M measures, and the estimated total mercury mass load reduced (consistent with the approved accounting procedures) resulting from implementing this control measure.	Yes	New, but continues similar work done under MRP 2.0	X	X			9/30/2026	N
Program for Control	1. Implement or cause to be implemented treatment control measures, stormwater diversion to wastewater treatment facilities, redevelopment (provided GSI is implemented in compliance with C.3.b), or other control measures to treat old industrial land use at 70% efficiency, or by demonstrating an equivalent mercury load reduction.	New			X		7/1/2022		
Program for Control	2. Submit plans and schedules for implementing control measures and stormwater diversion to wastewater treatment facilities in old industrial areas to address mercury load reduction requirements included in this provision. This reporting shall include maps of the areas where control measures are to be implemented, the acreage of these catchments, and a description of design and sizing features all control measures, treatment devices and stormwater diversion facilities implemented for each treated catchment.	New			X			3/31/2023	N
Program for Control	3. Report on control measure and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Reporting shall include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.	New			X			9/30/2023	Y
Program for Control	4. Report as part of reporting under Provision C.11.a.iii(2) on all control measures and stormwater diversion measures implemented during the permit term and provide the total acreage treated and an estimate of the total mercury mass load reduced resulting from this implementation.	New			X			9/30/2026	N
Mercury Collection	1. Promote recycling of mercury-containing products and make efforts to increase effectiveness of these recycling efforts throughout the region.	No	Included in MRP 1.0				7/1/2022		
Mercury Collection	2. Report annually on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of these recycling efforts. Report the mass of mercury-containing material collected throughout the region along with an estimate of the mass of mercury contained in recycled material using the methodology contained in load reduction accounting system described and cited in the Fact Sheet.	No	Included in MRP 1.0					9/30/2023	Y
Plan and Implement	1. Implement green stormwater infrastructure (GSI) projects during the term of the Permit consistent with implementing requirements in Provision C.3.j.	No		A	X		7/1/2022		
Plan and Implement	2. Report as part of Provision C.11.a.iii(2) on all green stormwater projects (e.g., parcel-based, street ROW, and regional projects) implemented during the permit term and provide the total acreage treated and an estimate of the total mercury mass load reduced resulting from this implementation. This reporting shall include summary descriptions of the implemented projects including GSI type, location, and area.	No			X			9/30/2026	N
Prepare Implementation	1. Update, as necessary, mercury control measures implementation plan and corresponding reasonable assurance analysis (RAA) from the previous permit term (2015-2020, MRP 2). The updated long-term plan must include identification of all technically and economically feasible mercury control measures to be implemented (including GSI projects); include a schedule according to which these technically and economically feasible control measures will be fully implemented; and, evaluate/quantify the mercury load reduction of such measures as well as an evaluation of costs, control measure efficiency and significant environmental impacts resulting from their implementation.	No		X	A		7/1/2025		

Provision C.11. Mercury Controls

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Assess PCBs Load Reductions from Stormwater	1. Implement an assessment methodology and data collection program to quantify, in a technically sound manner, PCBs loads reduced through implementation of pollution prevention, source control, and treatment control, green stormwater infrastructure and other measures taken as part of the PCBs control program defined by this provision. Use the assessment methodology to demonstrate the load reductions achieved during this Permit term as well as progress toward achieving the MRP program area PCBs TMDL wasteload allocations.	No		A	X		7/1/2022		
Assess PCBs Load Reductions from Stormwater	2. Submit documentation annually confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.	New		A	X			9/30/2023	Y
Assess PCBs Load Reductions from Stormwater	3. Update the assessment methodology as necessary for use in the subsequent permit term.	No		X	A			9/30/2026	N
Assess PCBs Load Reductions from Stormwater	4. Report the total loads reduced using the assessment methodologies described and cited in the Fact Sheet to demonstrate cumulative mercury load reduced from each control measure implemented since the beginning of the Permit term. This report shall also include an estimate of load reductions from control measures taking place after the 2026 Annual Report submittal but before the end of the permit term. Permittees shall submit all supporting data and information necessary to substantiate the load reduction estimates.	No		A	X			9/30/2026	N
Program for Source Property Identification and Abatement	1. Investigate, using both conventional sampling and laboratory analysis techniques, land areas that likely contribute PCBs to municipal separate storm sewer system (MS4s).	Yes	New, but continues similar work done under MRP 2.0	A	X		7/1/2022		
Program for Source Property Identification and Abatement	2. For those properties or land areas found to be contributing substantial amounts of PCBs or where high PCBs concentrations are found (generally areas with sediment concentrations greater than 0.5 mg Hg/kg), take action to abate the PCBs sources into their MS4s or refer the properties to the Water Board for follow-up measures.	Yes	New, but continues similar work done under MRP 2.0	A	X		7/1/2022		
Program for Source Property Identification and Abatement	3. For each source property referred to the Water Board, implement interim enhanced operation and maintenance (enhanced O&M) measures in the street or storm drain infrastructure adjacent to the referred source property or implement a stormwater treatment system downstream of the property. These enhanced O&M measures shall be sufficient to intercept historically deposited contaminated sediment in the vicinity of the source area and prevent further contaminated sediment from being discharged from the source area to the storm drain system.	Yes	New, but continues similar work done under MRP 2.0		X		7/1/2022		
Program for Source Property Identification and Abatement	4. Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of the old industrial land use indicated above. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement, etc.).	Yes	New, but continues similar work done under MRP 2.0	A	X			9/30/2022	Y
Program for Source Property Identification and Abatement	5. Report annually on ongoing enhanced O&M activities associated with all past contaminated property referrals.	Yes	New, but continues similar work done under MRP 2.0		X			9/30/2022	Y
Program for Source Property Identification and Abatement	6. Prior to all new referrals, submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.	Yes	New, but continues similar work done under MRP 2.0	A	X			As Needed	N
Program for Source Property Identification and Abatement	7. Report as part of reporting under Provision C.11.a.iii.(2) on total acreage of land area investigated, area and description of properties referred, description of enhanced O&M measures, and the estimated total PCBs mass load reduced (consistent with the approved accounting procedures) resulting from implementing this control measure.	Yes	New, but continues similar work done under MRP 2.0	X	X			9/30/2026	N
Program for Control Measure Implementation in Old Industrial Areas	1. Implement or cause to be implemented treatment control measures, stormwater diversion to wastewater treatment facilities, redevelopment (provided GSI is implemented in compliance with C.3.b), or other control measures to treat old industrial land use at 70% efficiency, or by demonstrating an equivalent PCBs load reduction.	New			X		7/1/2022		
Program for Control Measure Implementation in Old Industrial Areas	2. Submit plans and schedules for implementing control measures and stormwater diversion to wastewater treatment facilities in old industrial areas to address PCBs load reduction requirements included in this provision. This reporting shall include maps of the areas where control measures are to be implemented, the acreage of these catchments, and a description of design and sizing features all control measures, treatment devices and stormwater diversion facilities implemented for each treated catchment.	New		A	X			3/31/2023	N
Program for Control Measure Implementation in Old Industrial Areas	3. Report on control measure and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Reporting shall include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.	New		A	X			9/30/2023	Y
Program for Control Measure Implementation in Old Industrial Areas	4. Report as part of reporting under Provision C.11.a.iii.(2) on all control measures and stormwater diversion measures implemented during the permit term and provide the total acreage treated and an estimate of the total PCBs mass load reduced resulting from this implementation.	New		X	X			9/30/2026	N
Program for Controlling PCBs from Bridges and Overpasses	1. implement a Caltrans specification (to be developed through proposed requirement in Caltrans stormwater permit, see Fact Sheet for details) to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing material in bridge roadway expansion joints.	New		A	X		7/1/2022		
Program for Controlling PCBs from Bridges and Overpasses	2. Track the development of the Caltrans specification and within six months after availability, implement or cause to be implemented the Caltrans specification during applicable replacement activities that are under the direction of the Permittee.	New		A	X	A	12/31/2022 (or 6 months after availability of the specification)		
Program for Controlling PCBs from Bridges and Overpasses	3. Develop a description of the Caltrans specification for managing PCBs-containing materials in bridge or roadway expansion joints during roadway replacement or repair.	New		X	A	X	7/1/2022	9/30/2022 (or AR immediately following availability of specification)	N
Program for Controlling PCBs from Bridges and Overpasses	4. Prepare an inventory of bridges in Permittees' jurisdictions that includes bridge ownership and a replacement/repair schedule.	New		A	X		7/1/2022	9/30/2023	N

Provision C.11. Mercury Controls

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Program for Controlling PCBs from Bridges and Overpasses	5. Submit documentation confirming the use of the Caltrans specification (once it is available) during all instances of bridge roadway replacement or repair in their jurisdiction during that reporting year and provide an estimate of the volume of material managed and total PCBs mass load reduced resulting from implementation of the specification.	New			X			9/30/2023	Y
Program for Controlling PCBs from Bridges and Overpasses	6. Report as part of reporting under Provision C.12.a.iii.(2) an estimate of the total PCBs mass load reduced, consistent with approved accounting procedures, resulting from implementing this control measure.	New		X	X			9/30/2026	N
Program for Controlling PCBs from Electrical Utilities	1. Develop and implement a program to manage PCBs in oil-filled electrical equipment (OFEE) for municipally-owned electrical utilities in the MRP program area.	New		A	X		7/1/2022		
Program for Controlling PCBs from Electrical Utilities	2. Develop or improve standard operating procedures to respond to, clean up, and report spills and releases from municipally owned OFEE and fully implement these procedures. Submit a description of the improved spill response and reporting practices implemented by municipally owned electrical utilities.	New		A	X		7/1/2022	9/30/2023	N
Program for Controlling PCBs from Electrical Utilities	3. Develop and implement a plan to maintain and upgrade municipally owned OFEE.	New		A	X		7/1/2022	9/30/2024	N
Program for Controlling PCBs from Electrical Utilities	4. Report annually on actions undertaken during the reporting year that remove municipally owned PCBs-containing OFEE along with the loads avoided and the details of the calculations and assumptions used to estimate the load reduced.	New			X			9/30/2023	Y
Program for Controlling PCBs from Electrical Utilities	4. Document the PCBs loads avoided (along with supporting documentation) resulting from the removal of municipally-owned PCBs-containing OFEE through maintenance programs and system upgrades for the period 2002 to the beginning of this permit term (2023).	New		A	X			9/30/2023	N
Program for Controlling PCBs from Electrical Utilities	5. Submit in the 2026 Annual Report, as part of reporting under Provision C.12.a.iii.(2), the estimated PCBs loads reduced during the permit term associated with municipally owned OFEE removal resulting from maintenance programs and system upgrades.	New		A	X			9/30/2026	N
Program for Controlling PCBs from Electrical Utilities	6. Collaborate with the Water Board to determine PCBs loadings in OFEE from non-municipally owned electrical utilities.	New		A		X	7/1/2022		
Program for Controlling PCBs from Electrical Utilities	7. Evaluate the information obtained through collaboration with the Water Board and submit a report discussing, to the extent possible given any data limitations: (a) locations of the PCBs-containing OFEE still in service, (b) previous locations of PCBs-containing OFEE, and (c) opportunities to improve non-municipally owned electrical utilities' standard operating procedures for spill response, reporting, cleanup, and sampling and analysis.	New		A		X		Within 12-months of receiving info from Water Board on non-municipally owned electrical utilities.	N
Plan and Implement Green Stormwater Infrastructure to Reduce PCBs Loads	1. Implement green stormwater infrastructure (GSI) projects during the term of the Permit consistent with implementing requirements in Provision C.3.j.	No			X		7/1/2022		
Plan and Implement Green Stormwater Infrastructure to Reduce PCBs Loads	2. Report as part of Provision C.12.a.iii.(2) on all green stormwater projects (e.g., parcel-based, street right-of-way, and regional projects) implemented during the permit term and provide the total acreage treated and an estimate of the total PCBs mass load reduced resulting from this implementation. This reporting shall include summary descriptions of the implemented projects including GSI type, location, and area.	No		A	X			9/30/2026	N
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	1. Prior to issuing a demolition permit, implement the protocol developed during the previous permit term for managing PCB-containing materials and wastes during building demolition so that PCBs do not enter MS4s.	No			X		7/1/2022		
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	2. Beginning the 2023 rainy season, inspect demolition sites with applicable structures containing building materials with PCBs concentrations of 50 ppm or greater pursuant to Provision C.6 to ensure that effective construction pollutant controls are used to prevent discharge into the MS4.	New			X		10/1/2022		
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	3. For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater approved beginning July 1, 2023, require demolition contractors to provide notification to the Permittees, the Water Board, and U.S. EPA at least one week before any demolition is to occur.	New			X		7/1/2023		
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	4. Enhance construction site control program to minimize migration of PCBs into the MS4 from applicable structures containing building materials with PCBs concentrations of 50 ppm or greater during demolition activities. Enhancements may include inspecting demolition sites monthly during demolition activities in the dry season (May – September) and requiring the demolition contractors to sweep the project sites and the streets around the property with street sweepers that will effectively remove sediment and dust.	New		A	X		7/1/2023		
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	5. Report on enhancements to construction site control programs to minimize migration of PCBs from demolition activities into the MS4.	New		X	X			9/30/2023	N

Provision C.11. Mercury Controls

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	6. For demolition of applicable structures containing building materials with PCBs concentrations of 50 ppm or greater approved after July 1, 2023, verify that PCBs in demolished buildings are properly managed to minimize transport to the MS4 by obtaining official documentation that the building materials with PCBs concentrations of 50 ppm or greater in these demolished applicable structures were disposed appropriately according to state and federal regulations.	New			X		7/1/2023		
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	7. Provide documentation for each jurisdiction seeking exemption from Provision C.12.g requirements based on lack of applicable structures.	No			X			9/30/2023	N
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	8. Provide documentation of 1) number of applicable structures that applied for a demolition permit and 2) running list of the applicable structures that applied for a demolition permit with address, date, description, etc. as stated in MRP.	No			X			9/30/2023	Y
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	9. Provide documentation of whether the site was inspected during demolition, and for those cases where notification and advance approval from the U.S. EPA is not required and were approved for demolition after June 30, 2023, the hazardous waste manifest prepared for transportation of the material to a disposal facility.	New			X			9/30/2024	Y
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	10. Submit an evaluation of the effectiveness of the protocol for controlling PCBs during building demolition as well as supporting data. This should be conducted and reported at the regional level on behalf of all Permittees and shall be considered the Report of Waste Discharge for Provision C.12.g for the next permit reissuance.	No				X		9/30/2026	N
Manage PCB-Containing Materials and Wastes During Building Demolition Activities	11. Submit for use in the subsequent permit term an updated assessment methodology and data collection program to quantify PCBs loads reduced through implementation of the protocol for controlling PCBs-containing materials and wastes during demolition of applicable structures.	No				X		9/30/2026	N
Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations	1. Update, as necessary, PCBs control measures implementation plan and corresponding reasonable assurance analysis (RAA) from the previous permit term (2015-2020, MRP 2). The updated long-term plan must include identification of all technically and economically feasible PCBs control measures to be implemented (including GSI projects); include a schedule according to which these technically and economically feasible control measures will be fully implemented; and evaluate/quantify the PCBs load reduction of such measures as well as an evaluation of costs, control measure efficiency and significant environmental impacts resulting from their implementation.	No		X	A		7/1/2022		

Provision C.13. Copper Controls

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal
		Change	Notes	Program	Permittee	Regional			
Manage Waste Gen	1. Establish local ordinance authority to prohibit discharges from copper features.	No		A	X		7/1/2022		
Manage Waste Gen	2. Require the use of BMPs when issuing building permits.	No			X		7/1/2022		
Manage Waste Gen	3. Educate installers and operators on appropriate BMPs.	No			X		7/1/2022		
Manage Waste Gen	4. Enforce against noncompliance.	No			X		7/1/2022		
Manage Waste Gen	6. If not previously done, report on existing legal authority to prohibit such discharges and to ensure compliance.	No			X		7/1/2022	9/30/2022	N
Manage Waste Gen	7. Report how copper architectural features are addressed through the issuance of building permits.	No			X		7/1/2022	9/30/2022	N
Manage Waste Gen	8. Report annually on permitting and enforcement activities.	No			X		7/1/2022	9/30/2022	Y
Manage Discharges	1. If not previously done, certify that legal authority already exists to prohibit such discharges by submitting documentation with a plan and schedule to implement and enforce existing authority.	No			X		7/1/2022	9/30/2022	N
Manage Discharges	2. Report how copper containing discharges from pools, spas, and fountains are addressed to accomplish the prohibition of the discharge.	No					7/1/2022	9/30/2022	N
Manage Discharges	3. Report on implementation and enforcement of existing legal authority in Annual Reports.	No			X		7/1/2022	9/30/2022	Y
Industrial Sources	1. Educate industrial inspectors on industrial facilities likely to use copper (e.g., plating facilities, metal finishers, auto dismantlers).	No		A	X		7/1/2022		
Industrial Sources	2. Inspectors shall ensure that proper BMPs are in place at such facilities to minimize discharge of copper to storm drains, including consideration of roof runoff that might accumulate copper deposits from ventilation systems on-site.	No			X		7/1/2022		
Industrial Sources	3. Highlight results in the industrial inspection component of each Annual Report.	No		X			7/1/2022	9/30/2022	Y

Provision C.14. Polybrominated Diphenyl Ethers (PBDE), Legacy Pesticides and Selenium

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Municipal Operations	(2) Develop and implement BMPs to minimize potential bacteria sources, including, but not limited to, trash, human and animal fecal sources, and excessive biofilm, for the following municipal operations: (a) Street and road cleaning (b) Parks and municipal open space maintenance (c) Sidewalk, plaza, and pavement cleaning (d) MS4 component maintenance, such as cleaning biofilm from catch basins, piping, and pump stations.	New			Cities (Sunnyvale and Mountain View only)		7/1/2022		
Municipal Operations	(3) Describe the BMPs, frequency and location for actions taken to reduce bacteria sources related to municipal operations.	New			Cities			9/30/2023	Y
Industrial/Commercial	(2) Enhance efforts to ensure transport to surface waters from the following potential bacteria sources is minimized: (a) Roof and exterior washoff of commercial and industrial structures and surfaces, where these sources are likely to contain bacteria, such as from rodent and bird wastes, and are likely to be discharged to receiving water (b) Outdoor garbage and recycle bins (c) Outdoor floor-mat washoff (d) Portable toilets (e) Illicit discharges to the MS4	New			Cities		7/1/2022		
Industrial/Commercial	(3) Describe the BMP, frequency, and location for actions taken to reduce bacteria sources related to Industrial and Commercial Site Bacteria Control and Illicit Discharge Detection and Elimination.	New			Cities			9/30/2023	Y
Control of Bacteria Sources	(2) Minimize the transport of bacteria from areas inhabited by unsheltered homeless persons by taking actions that may include, but are not limited to, the following: (a) Provide pump-out stations, mobile pumping services, or voucher programs for proper disposal of sanitary sewage where unsheltered homeless persons reside in recreational vehicles (b) Provide sanitation services, including access to running water, where feasible, at locations where homeless people live or congregate. (c) Establish and update sidewalk, street, and/or plaza cleaning standards for the cleanup and appropriate disposal of human waste	New			Cities		7/1/2022		
Control of Bacteria Sources	(3) Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria discharges from areas inhabited by unsheltered persons.	New			Cities			9/30/2023	Y
Pet and Livestock BMPs	(2) Ensure transport of bacteria from domestic animal sources to surface waters is minimized by taking the following actions: (a) Enhance numbers of, and maintenance of, pet waste stations (b) Inspect pet boarding facilities to ensure pet waste is managed to prevent offsite discharges (c) Inspect horse boarding facilities, if any, to ensure manure is managed to prevent offsite discharges. Notify Water Board staff of facilities that should enroll in the Confined Animal Facility program	New			Cities		7/1/2022		
Pet and Livestock BMPs	(3) Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria from domestic animal sources.	New			Cities			9/30/2023	Y

Provision C.15. Exempted and Conditionally Exempted Discharges

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal
		Change	Notes	Program	Permittee	Regional			
Exempted Non-Stormwater	In carrying out Discharge Prohibition A.1., the following unpolluted discharges are exempted from prohibition of non-stormwater discharges: (1) Flows from riparian habitats or wetlands; (2) Diverted stream flows; (3) Flows from natural springs; (4) Rising ground waters; (5) Uncontaminated and unpolluted groundwater infiltration; and (6) NPDES permitted discharges (individual or general permits).	No			X		7/1/2022		
Conditionally Exempted	The following non-stormwater discharges are also exempt from Discharge Prohibition A if they are either identified by the Permittees or the Executive Officer as not being sources of pollutants to receiving waters or if appropriate control measures to eliminate adverse impacts of such sources are developed and implemented in accordance with the tasks and implementation levels of each category of Provision C.15.b.i–vii.								
Conditionally Exempted	i. Discharge Type – Pumped Groundwater, Foundation Drains, Water from Crawl Space Pumps and Footing Drains: maintain records.	Yes	New monitoring constituents and reporting limits.	A	X		7/1/2022		
Conditionally Exempted	ii. Discharge Type – Air Conditioning Condensate	No		A	X		7/1/2022		
Conditionally Exempted	iii. Discharge Types: Emergency Discharges of Firefighting Water and Foam	No							
Conditionally Exempted	(2)(a) Collectively convene a regionwide Firefighting Discharges Working Group (Working Group) with Water Board staff and other stakeholders to identify and evaluate opportunities to reduce the impacts of emergency discharges to the MS4 associated with firefighting activity.	New		X	A	X	7/1/2022		
Conditionally Exempted	(2)(b) Collectively submit a Firefighting Discharges Report describing progress on and recommendations for BMPs/SOPs, existing resources, investigation of foams, outreach materials, information sharing, and reporting.	New		X	A	X		9/30/2025	N
Conditionally Exempted	(3) Ongoing Implementation Practices: (a) When the Firefighting Discharges Report is submitted, begin implementation of (and reporting on) the recommendations included therein.	New		A	X		9/30/2025	9/30/2026	Y
Conditionally Exempted	(3)(b) Ensure proper BMPs and SOPs are included in contracts for non-municipal (contracted) staff hired by Permittees to assist with containment and cleanup, and to assist with prevention and mitigation of adverse impacts, of discharges associated with firefighting emergencies.	New		A	X		7/1/2022	9/30/2023	Y
Conditionally Exempted	(3)(c) For large industrial sites within Permittees' jurisdictions – such as IGP sites, gas plants, gas concentration facilities, and chemical plants – Permittees shall evaluate the adequacy of those sites' BMPs and SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters within Permittees' jurisdictions, and cause those BMPs and SOPs to be improved as appropriate.	New		A	X		7/1/2022	9/30/2023	Y
Conditionally Exempted	(3)(d) By June 30, 2027, require all municipal staff and contracted staff hired by Permittee that participate in the containment and cleanup of discharges of firefighting water and foam from firefighting emergencies within their jurisdictions to attend at least one training on containment and cleanup BMPs and SOPs (and other BMPs and SOPs, as appropriate).	New		A	X	A	9/30/2025	9/30/2026 and/or 9/30/2027	N
Conditionally Exempted	(4)(a) Required BMPs - Implement and/or require firefighting personnel acting within their jurisdictions to implement BMPs and SOPs for emergency discharges – in order to reduce potential and actual water quality impacts – to the extent that the implementation of such BMPs does not interfere with immediate emergency response operations or impact public health and safety. (Refer to fact sheet for example BMPs.)	New	Except list of BMPs that "may" be implemented was moved to Fact Sheet and will be eventually replaced by the BMPs in the Firefighting Discharges Report.	A	X		7/1/2022		
Conditionally Exempted	iv. Discharge Type – Individual Residential Car Washing	No		A	X		7/1/2022		
Conditionally Exempted	v. Discharge Type - Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges - maintain records	No		A	X		7/1/2022		
Conditionally Exempted	vi. Discharge Type - Irrigation Water, Landscape Irrigation, Lawn or Garden Watering	No			X		7/1/2022		Y

Sort	Sub-Provision	Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin	Initial Submittal or	Annual	Comments
				Change	Notes	Program	Permittee	Regional	Implementation on:	Reporting Date	Submittal	

Provision C.15. Exempted and Conditionally Exempted Discharges

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	i.(1) Use results from biennial point-in-time census surveys and related information, such as municipal reports, databases, complaint logs, and other efforts, to gain a better understanding of unsheltered homeless population numbers within the Permittee's jurisdiction, the locations of unsheltered homeless residents, discharges and water quality-related impacts associated with homelessness, and associated sanitation-related needs.	New					7/1/2022		
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	i.(2) Collectively develop and submit a best management practice report, as described in Provision C.17.a.i.(2), that identifies effective practices to address non-storm water discharges associated with homelessness into MS4s that impact water quality and specific milestones for reducing such discharges within a given timeframe.	New					7/1/2022	9/30/2023	N
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	ii.(1) Submit a map identifying the approximate location(s) of unsheltered homeless populations, including homeless encampments and other areas where other unsheltered homeless people congregate/live, per Provision C.17.a.II.(1). Update the map in 2025.	New					7/1/2022	9/30/2023 and 9/30/2025	N
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	ii.(2) Report on the programmatic efforts being implemented within Permittee jurisdiction, or at the countywide or regional level, to address MS4 discharges associated with homelessness.	New					7/1/2022	9/30/2023 and 9/30/2025	N
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	ii.(3) Identify and implement appropriate best management practices to address MS4 discharges associated with homelessness that impact water quality including those impacts that can lead to public health impacts. In addition, evaluate and assess the effectiveness of those practices, specifically by reporting on the BMP control measures being implemented, the approximate portion of the Permittee's unsheltered homeless population and locations being served by those control measures, and the portion and locations of the Permittee's unsheltered homeless population not reached, or not fully reached by the implemented control measures.	New					7/1/2022	9/30/2023 and 9/30/2025	N
Discharges Associated with Unsheltered Homeless Populations: Permittee Requirements	ii.(4) Use the information generated through the biennial point-in-time census surveys and related information, and the regional coordination tasks (as described above) to review and update Permittee implementation practices.	New					7/1/2023		

Sort	Sub-Provision	Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin	Initial Submittal or	Annual	Comments
				Change	Notes	Program	Permittee	Regional	Implementation on:	Reporting Date	Submittal	

Sort	Sub-Provision	Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)	Comments
				Change	Notes	Program	Permittee	Regional				
1	C.19.d	Methylmercury Control Measure Plan and Monitoring	ii.(1) Implementation Level - Prepare and submit by November 1, 2022, a Control Measure Plan and schedule to achieve the TMDL wasteload allocations. The Plan shall include a corresponding RAA for total mercury and methylmercury demonstrating that sufficient control measures will be implemented during this Permit term to attain the methylmercury Delta Mercury Control Plan wasteload allocations by January 1, 2030, or any revised final compliance date adopted by the Central Valley Water Board as part of the Delta Mercury Control Program Review.	New		X				11/1/2022	N	Methylmercury Control Measure Plan
2	C.19.d	Methylmercury Control Measure Plan and Monitoring	ii.(2) Conduct annual monitoring in waterways within the East County Permittees' MS4 boundary to answer the questions in Provision C.19.d.ii(2)(a)-(e). Monitoring shall include, but is not limited to, Marsh Creek, downstream of Marsh Creek Reservoir, and Central and West Delta Subarea tributaries within the MS4 boundary. Permittees shall collect fifty (50) samples throughout the Permit term, with at least eight (8) samples annually, for aqueous methylmercury analysis. Samples shall be collected in each subarea to be representative of the discharge during wet and dry year conditions and analyzed using U.S. EPA- or SWAMP-approved methods.	Yes	Monitoring in the Central and West Delta Subareas is new.	X	X		10/1/2022			Annual MeHg Monitoring
3	C.19.d	Methylmercury Control Measure Plan and Monitoring	ii.(3) and iii.(1) Prepare an Annual Mercury Monitoring Plan and submit it to the Central Valley Water Board for Executive Officer approval. The monitoring plan shall describe the annual monitoring design and specify the proposed sampling locations for methylmercury sampling required under Provision C.19.d.ii.(2).	New		X				10/1/2022	N	Initial Annual Mercury Monitoring Plan
4	C.19.d	Methylmercury Control Measure Plan and Monitoring	iii.(1) Annual Mercury Monitoring Plan – by October 1, 2022, and annually thereafter with the Urban Creeks Monitoring Report due March 31.	New		X				3/31/2023	Y	Annual Mercury Monitoring Plan
5	C.19.d	Methylmercury Control Measure Plan and Monitoring	iii.(2) Annual Report - The East County Permittees shall provide the following: (a) Monitoring and assessment results answering the questions required under Provision C.19.d.ii.(2), and (b) Upon completion by the deadline in Provision C.19.d.ii.(1), submit the Control Measure Plan, including RAA. A copy of each Annual Report shall also be submitted to the Central Valley Water Board.	New		X				9/30/2023	Y	<u>Annual Report</u> - MeHg monitoring and assessment results (and Control Measure Plan and RAA, when completed)

6	C.19.d	Methylmercury Control Measure Plan and Monitoring	iii.(3) Pollutants of Concern Monitoring Report – The East County Permittees shall report monitoring and assessment activities relevant to the Delta Methylmercury TMDL from the past water year and planned for the next water year as a separate section within the Pollutants of Concern Monitoring Report required under Provision C.8.h.iv. A copy of each Pollutants of Concern Monitoring Report shall also be submitted to the Central Valley Water Board.	No		X				3/31/2023	Y	East County specific MeHg POCs report with the UCMR
7	C.19.d	Methylmercury Control Measure Plan and Monitoring	iv.(4) Integrated Monitoring Report – The East County Permittees shall report the monitoring and assessment results as a separate section within the Integrated Monitoring Report as required under Provision C.8.h.v. A copy of each Integrated Monitoring Report shall also be submitted to the Central Valley Water Board.	No		X				3/31/2026	N	East County specific MeHg Report with the Integrated Monitoring Report
8	C.19.d	Methylmercury Control Measure Plan and Monitoring	iv.(5) The East County Permittees shall report progress on the Delta Methylmercury TMDL and recommendations for the next permit re-issuance as a separate section within the Report of Waste Discharge (ROWD) required by Provision C.25. A copy of the ROWD shall also be submitted to the Central Valley Water Board.	No		X				1/1/2027	N	Progress report on the Delta MeHg TMDL with the ROWD.
9	C.19.e	Delta Mercury Control Program Minimum BMPs	ii.(1) Mercury Collection and Recycling - To minimize mercury in storm water the East County Permittees shall continue implementing: (a) Collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs); and (b) Collection, recycling and/or diversion of mercury-containing waste products (e.g., gauges, batteries, fluorescent and other lamps, switches, relays and sensors) from the waste stream from industrial and commercial entities (e.g., auto dismantlers), and municipal facilities.	No		A	X		7/1/2022			Mercury Collection and Recycling
10	C.19.e	Delta Mercury Control Program Minimum BMPs	ii.(2) Enhanced Municipal Management Practices to Reduce Sediment Discharges - The East County Permittees shall continue to implement BMPs to minimize sediment discharges during municipal operations and municipal maintenance activities. Municipal operations and municipal maintenance activities include but are not limited to the following: storm drain drop inlet and pipeline cleaning, landscaping, road construction, road repair, and pump station cleaning.	No		A	X		7/1/2022			Enhanced Municipal Management Practices to Reduce Sediment Discharges

11	C.19.e	Delta Mercury Control Program Minimum BMPs	ii.(3) Public Education and Risk Reduction - The East County Permittees shall continue to conduct ongoing education to the public on mercury pollution prevention and mercury risk reduction. The East County Permittees shall continue to: (a) Provide mercury pollution prevention messages to residents, commercial businesses, and industrial facilities with mercury-containing products or emissions. This may be implemented as part of Provision C.7; and (b) Provide notices to communities on the health risk associated with eating mercury contaminated fish. These notices shall also include the Office of Environmental Health Hazard Assessment's fish consumption advisories.	No		A	X		7/1/2022			Public Education and Risk Reduction
12	C.19.e	Delta Mercury Control Program Minimum BMPs	ii.(4) Methylmercury Controls – the East County Permittees shall implement control measures that reduce mercury methylation potential and retrofit existing BMPs that show an increase of mercury methylation.	New		A	X		7/1/2022			Methylmercury Controls and Retrofit BMPs
13	C.19.e	Delta Mercury Control Program Minimum BMPs	iii. Reporting – In each Annual Report, the East County Permittees shall: (1) Describe Mercury Collection and Recycling efforts. (2) List the municipal operations and municipal maintenance activity BMPs that are implemented to minimize sediment discharges. (3) Discuss the mercury pollution prevention messages provided and (4) Summarize tasks implemented to provide notices on the health risk associated with eating mercury contaminated fish. (5) Report on implementation of methylmercury controls required in C.19.2.ii.(4).	No		A	X			9/30/2023	Y	Annual Report - Mercury Control Program
14	C.19.f	Pyrethroid Control Program	ii. Implementation Level – The East County Permittees shall: (1) Continue to implement a pesticide control program as required by Provision C.9, which is consistent with Central Valley Water Board requirements for a pyrethroid management plan. (2) Continue pesticides and toxicity monitoring as specified in Provision C.8.g. In addition to the pollutants and organisms listed in Table 8-5, the East County Permittees shall also analyze total and particulate organic carbon, as required by the Central Valley Water Board's Basin Plan Amendment (R5-2017-0057).	Yes	Includes particulate organic carbon	X			10/1/2022			Additional P&T Monitoring Requirements

15	C.19.f	Pyrethroid Control Program	ii.(3) Submit a baseline monitoring report by September 19, 2022, that: (a) Summarizes the pyrethroid and toxicity monitoring results from 2012 through 2019; (b) Assesses the compliance of the discharge with the conditional prohibition triggers in the Basin Plan established by Resolution No. R5-2017-0057; (c) Summarizes toxicity of water and sediment samples to the test organism <i>Hyalella azteca</i> ; and (d) Summarizes any other pyrethroid monitoring data collected by the East County Permittees during the above period.	New		X				9/19/2022	N	Pyrethroid Baseline Monitoring Report (summarizes results from 2012 to 2019)
16	C.19.f	Pyrethroid Control Program	iii.(1) With the 2024 and subsequent Annual Reports, provide a progress report to document the management practices that have been implemented, evaluate pyrethroid concentrations with respect to the pyrethroid triggers, and identify effective control actions to be taken in the future. A copy shall be provided to the Central Valley Water Board.	New		A	X			9/30/2024	Y	<u>Annual Report</u> - Progress report on pyrethroid controls
17	C.19.f	Pyrethroid Control Program	iii.(2) Urban Creeks Monitoring Report (UCMR) – The East County Permittees shall report monitoring, assessment results, relevant to the Pyrethroids Control Program as a separate Pyrethroid Trend Monitoring section within the 2024 UCMR required under Provision C.8.h.iii. A copy of the 2024 UCMR shall also be submitted to the Central Valley Water Board. The Pyrethroid Trend Monitoring section of the 2024 UCMR, shall include an analysis of data collected in East County Permittees receiving waters for pesticides and toxicity from 2019 through 2024.	New		X				3/31/2025	N	Pyrethroid Trend Monitoring section with the 2024 UCMR

MRP 3.0 Tasks and Changes from MRP 2.0

Provision C.15. Exempted and Conditionally Exempted Discharges

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Cost Reporting	i. Develop a cost reporting framework and methodology to perform an annual fiscal analysis. Permittees are encouraged to collaboratively develop the framework and methodology for purposes of efficiency, cost-savings, and regionwide consistency and comparability. The framework shall consider identification of costs incurred solely to comply with this Order’s requirements as listed in Provision C.20.b.(iii) as compared to costs shared with other programs or regulatory requirements, provide meaningful data to assess costs of different program areas, and allow for comparisons and to identify trends over time.	New		X	A	X	7/1/2022		
Cost Reporting	ii. In the annual fiscal analysis, include a description of the source of funds that are proposed to meet the necessary expenditures, including legal restrictions on the use of such funds, and identify any funding resources shared on a regional or countywide basis. Include the costs incurred to comply with this Permit, and an estimate of costs for the upcoming Permit year	New		A	X		7/1/2024		
Cost Reporting	iii. Include the following program areas in the annual fiscal analysis: 1) Program management 2) Municipal operations 3) New development and redevelopment 4) Industrial and commercial site controls 5) Illicit discharge detection and elimination 6) Construction site controls 7) Public information and outreach 8) Water quality monitoring 9) Pesticides toxicity control 10) Trash load reduction 11) Mercury controls 12) PCBs controls 13) Copper controls 14) Bacteria controls 15) Discharges associated with unsheltered homeless populations 16) Asset management plan development and implementation	New		A	X		7/1/2024		
Cost Reporting	iv. The costs reported for each program area shall address the following categories: 1) Total cost 2) Capital expenditures 3) Land costs 4) Personnel costs 5) Consultant costs 6) Overhead costs 7) Construction costs 8) Operation and maintenance costs 9) Other costs	New		A	X		7/1/2024		
Reporting	i. Submit the cost reporting framework and methodology, acceptable to the Regional Water Board Executive Officer, by June 30, 2023	New		X		X	7/1/2022	6/30/2023	N

MRP 3.0 Tasks and Changes from MRP 2.0

Provision C.15. Exempted and Conditionally Exempted Discharges

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Reporting	ii. Submit the fiscal analyses annually according to the accepted cost reporting framework and methodology starting with the 2025 Annual Report.	New		A	X		7/1/2024	9/30/2025	Y

Provision C.15. Exempted and Conditionally Exempted Discharges

Sub-Provision Name	Task	Changes from MRP 2.0		Implementation Lead			Begin Implementation on:	Initial Submittal or Reporting Date	Annual Submittal (Y/N)
		Change	Notes	Program	Permittee	Regional			
Asset Management Implementation	i. Develop an Asset Management Plan that, at a minimum, includes the following: (1) A description of the asset categories to be included. (2) An inventory (or link to such an inventory) of Permittees' existing hard assets built pursuant to the Provisions cited in Provision C.21.a, including at a minimum all LID/GSI systems and trash capture devices. (3) An Operation, Maintenance, Rehabilitation, and Replacement Plan (Asset Management O&M Plan), to evaluate data obtained through asset assessment in order to inform a strategy for prioritizing and scheduling maintenance, rehabilitation, and replacement of inventoried assets, as described in Provisions C.21.b.i.(3)(a)-(c). (4) Recommendations for a reporting strategy, which may have a nexus with the tracking systems referenced in Permittees' Green Infrastructure Plans, to include: (a) Municipality-specific reporting; (b) Assessment of the programmatic benefit from countywide or regional roll-up of collected information.	New		A	X		7/1/2022		
Asset Management Implementation	ii. Begin implementation of the Asset Management Plan	New		A	X		7/1/2025		
Asset Management Implementation	iii. Reassess and update the Asset Management Plan on an as-needed basis, to address changing conditions and resources	New		A	X		7/1/2025		
Asset Management Implementation	iv. Provide the latest version of the Asset Management Plan to Water Board staff during inspections and audits, or otherwise upon request	New		A	X		7/1/2025	As needed	
Asset Management Implementation	v. Complete a Climate Change Adaptation Report to identify potential climate change-related threats to assets and appropriate adaptation strategies. The report shall assess existing, new, and increasing threats from climate change to the condition of Permittees' inventoried hard assets over the next 50 years, and identify approaches that Permittees may implement to address those threats, such as the modification of design standards and countywide technical guidance documents. The Climate Change Adaptation Report may be developed on an all-Permittee (regional) scale or countywide scale.	New		A	A	X	7/1/2022		
Asset Management Reporting	i. Submit the Asset Management Plan with the 2025 Annual Report.	New			X			9/30/2025	N
Asset Management Reporting	ii. Report on the implementation of the Asset Management Plan annually, starting with the 2026 Annual Report, as follows: (1) Provide (or link to) an inventory of all assets accounted for in the Asset Management Plan. (2) At a minimum, for each asset in the inventory, provide the following: category or type of water quality control; relevant design information; tributary drainage area; location; condition based on periodic inspections either by municipal or contracted staff; and operation and maintenance need.	New		A	X			9/30/2026	Y

[illegible]

Provision	Type	General Description	Required	Due Date	BAMSC Group	Milestone Dates	Approach/Funding	Notes
C.3.c.(2)(c)(ii)(a)	Workgroup	Workgroup with Water Board to investigate the pollutant removal effectiveness of high flow rate media	Optional	No due date listed	Development			May lead to permit amendment.
C.3.d.iv	Workgroup	Proposal for Tree Runoff Reduction and Tree-Based Stormwater Treatment Systems	Optional		Development			Optional for permittees.
C.3.d.v(1)	Regional Project/Deliverable	Tree Runoff Reduction and Tree-Based Stormwater Treatment Systems	Optional	30-Sep-25	Development			Permittees may collectively submit a proposal supporting the treatment reduction credits for trees
C.3.g.vi(4)	Workgroup	Update to BAHM and the BAHM User Manual	Optional	NA	Development			ACCWP, SMCWPPP, SCVURPPP SSA? CCCWP if opt for BAHM
C.3.g.vi(4)	Regional Project/Deliverable	Update to BAHM and the BAHM User Manual	Mandatory when updated	Annual Report	Development			Updates to BAHM are to be reported in Annual Report at the countywide level.
C.3.j.ii (2)(h);	Workgroup	Alternative GSI techniques	Optional		Development			This is an option for rural communities. Proposal must be submitted collectively.
C.3.j.v(5)	Regional Project/Deliverable	Proposal for alternative GSI techniques	Optional - Collectively Submit	30-Sep-23	Development			Submit proposal for pilot projects for alternative GSI
C.3.j.ii.(4)	Workgroup	Long term GSI goals and percentage reduction technical work group (TWG)	Mandatory		Development			Water Board staff and impartial science experts (e.g., SFEI, SFEP, U.S. EPA Region 9) Meet at minimum biannually leading up to report submittal, annually thereafter
C.3.j.v(7)	Regional Project/Deliverable	Report summarizing TWG effort and recommendations	Mandatory	30-Sep-24	Development			
C.8.d.ii	Workgroup	LID Monitoring Technical Advisory Group (TAG)	Mandatory		MPC			TAG shall be convened biannually at minimum until approval of plan and annually there after. Must include impartial science advisors (e.g., SFEI, SCCWRP) and Water Board staff
C.8.d.vi	Regional Project/Deliverable	LID Monitoring Plan	Mandatory	31-May-23	MPC			Each countywide program will develop their LID Monitoring Plan with regional coordination through MPC and the TAG. There may be sections of the plan developed through regional collaboration, but is that a Regional Project
C.8.e.iv	Workgroup	Trash Monitoring TAG	Mandatory		MPC Trash			TAG shall be convened biannually at minimum until approval of plan and annually thereafter. Must include impartial science advisors (e.g., SFEI, SCCWRP) and Water Board staff
C.8.e.v	Regional Project/Deliverable	Trash Monitoring Plan	Mandatory	31-Jul-23	MPC Trash			Each countywide program will develop their own Trash Monitoring Plan with regional coordination through MPC and the TAG. There may be sections of the plan developed through regional collaboration, but is that a Regional Project
C.8.h.vi	Regional Project/Deliverable	Comprehensive Bioassessment Final Report	Mandatory	31-Mar-24	MPC			Comprehensive analysis of bioassessment monitoring during MRP 1 and MRP 2, for Water Years 2012-2021
C.8	Regional Project/Deliverable	Grant Application - Receiving Water Trash Monitoring	Optional	TBD	MPC Trash Steering			Grant opportunity, anticipate grant RFP in Summer 2022
C.8	Regional Project/Deliverable	Grant Management - Receiving Water Trash Monitoring	Optional	TBD	MPC, Trash Steering			If grant is awarded need to determine how the grant would be managed.
C.10.b.vi	Regional Project/Deliverable	Partial Trash Reduction – Curb Inlet Screens	Optional	NA	Trash			Not specified as a collective report but if pursued, it may be beneficial to pursue collectively.
C.10.g.ix	Regional Project/Deliverable	Trash Full Capture Impracticability Report	Optional	31-Mar-23	Trash			Permittees may collectively submit a programmatic report that describes typical conditions where it may be impracticable to control trash via full trash capture devices (C.10.e)
C.11.g.ii	Workgroup	Fate and Transport Studies of Mercury and PCBs (Bay Margins)	Optional		MPC			Fate and Transport coordination and work is done through the RMP
C.11.g.ii	Regional Project/Deliverable	Fate and Transport Studies of Mercury and PCBs (Bay Margins)	Mandatory	30-Sep-23	MPC			Submit workplan in the Annual Report
C.11.g.ii	Regional Project/Deliverable	Fate and Transport Studies of Mercury and PCBs (Bay Margins)	Mandatory	15-Mar-26	MPC			Submit findings in the IMR
C.12.e	Workgroup	Program for Controlling PCBs from Electrical Utilities	Optional		MPC			Develop and implement a program for OFEE in municipal utilities and collaborate with Water Board on non-municipal utilities. Not specified as a collective report but if pursued, it may be beneficial to pursue collectively.

C.12.e.iii(6)	Regional Project/Deliverable	Progress on non-municipally owned OFEE	Mandatory	TBD	MPC			Due within 12 months of receiving list of utilities from Water Board. Not specified as a collective report but if pursued, it may be beneficial to pursue collectively.
C.12.g.ii	Workgroup	PCBs in Demolition Protocol & Guidance Update	Optional		MPC			Update guidance and program to implement new requirements. May needed Development for the construction inspection requirements.
C.12.g.iii(3)	Regional Project/Deliverable	PCBs in Demolition Protocol & Guidance Update	Mandatory	30-Sep-23	MPC			Begin implementing July 1, 2023. May needed Development for the construction inspection requirements.
C.12.g.iii(4)	Regional Project/Deliverable	Effectiveness evaluation of protocols, updated protocols and data collection for next permit term	Mandatory	30-Sep-26	MPC			
C.15.b.iii(2)(a)	Workgroup	Emergency Discharges of Firefighting Water and Foam	Mandatory		?			Convene a regionwide Firefighting Discharges Working Group (Working Group) together with Water Board staff – and other stakeholders. Workgroup shall be convened biannually at minimum until submittal of the report and annually thereafter.
C.15.b.iii(2)(b)	Regional Project/Deliverable	Firefighting Discharges Report	Mandatory	30-Sep-25	?			
C.17.a.ii (1)	Workgroup	Unsheltered homelessness BMPs	Optional		Trash?			
C.17.a.ii (1)	Regional Project/Deliverable	Report on BMPs to address non-stormwater discharges associated with homelessness	Mandatory	30-Sep-23	Trash?			
C.20.b.i	Workgroup	Cost Reporting Framework and Methodology	Optional		?			
C.20.c.i	Regional Project/Deliverable	Cost Reporting Framework and Methodology	Collaboration Encouraged	30-Jun-23	?			
C.21.b.v	Workgroup	Climate Change Adaptation Report	Optional		?			
C.21.c.iii	Regional Project/Deliverable	Climate Change Adaptation Report	Mandatory	30-Sep-26	?			Regional or Countywide, EPA Grant Application?
C.22	Workgroup	Annual Report Form	Optional		Steering			Collaboratively develop annual report forms. Need to start ASAP to prepare permittees for tracking new information.
C.22	Regional Project/Deliverable	Annual Report Form	Mandatory	1-Mar-23	Steering			Updates annually thereafter to be submitted on March 1st.
C.3.e.ii (5)	Water Board Staff Workgroup	Impact of C.3 Special Projects Category C on housing costs	Directed by Board Chair	Aug-23	Development			Report to Water Board at August hearing. Water Board Counsel noted that Staff committed to forming this workgroup.
C.3.b.ii.(1)(b)iii C.3.b.ii(5)	Water Board Staff Workgroup	Impact of road reconstruction requirements on road maintenance needs	Directed by Board Chair	Aug-23	Development			Report to Water Board at August hearing. Water Board Counsel noted that Staff committed to forming this workgroup
C.3	Water Board Staff Workgroup	Allowing “innovative bioretention” as LID treatment	Directed by Board Chair	Aug-23	Development			Report to Water Board at August hearing. Water Board Counsel noted that Staff committed to forming this workgroup. Anticipate this effort will be combined with the workgroup required by C.3.c.i(2)(c)(iii)(a).
C.8	Workgroup	Monitoring costs and logistics	Directed by Board Chair	Aug-23	MPC			Report to Water Board at August hearing.
C.9 E.7.a/E.11.h, E.11.j, E.15.a C.5, C.9 E.7.a, E.15.d F.5.b.2	Regional Project/Deliverable	BAMSC Regional Supplement for Tracking and Participating in Pesticide Regulatory Efforts	Regional report traditionally prepared by BASMAA	Aug-22				Phase I and Phase II version. May not be needed report was mainly the CASQA report with a regional cover sheet and 1 page intro.
	Regional Project/Deliverable	BAMSC Regional Supplement for Training and Outreach	Regional report traditionally prepared by BASMAA	Aug-22				Need Phase I and Phase II version.
C.3	Regional Project/Deliverable	BAMSC Regional Supplement New/Redevelopment	Regional report traditionally prepared by BASMAA	Aug-22				Phase I only.

Notes:

1. Workgroups are listed as optional unless specified by the MRP.
2. In general it was assumed that if a collective report would be submitted there would be a workgroup. This can be refined later once the approach is determined.
3. Some reports/deliverables are at the discretion of the permittees, e.g., tree credits; these are listed as optional.
4. Shading groups related efforts.
5. Milestone dates are key dates to meet the schedule, e.g., when deliverables need to be approved. TBD
6. Approach/Funding to be filled in based on considerations and decisions on the degree to which we need to collaborate regionally vs. doing things by countywide program and then combining the submittal, and if collaborating regionally, whether one program will take the lead or other method of joint funding. TBD

Management Committee: Agenda Topics for FY 22/23: Q1

Date	Action	Key MRP Gap Year Issue/Agenda Topics	Lead
20-Jul-22	Review	Draft adjusted budget for FY 22/23 (adjusted for first six months of fiscal year)	Mitch
20-Jul-22	Presentation	Strategic Staffing Plan	Karin
20-Jul-22	Presentation	Overview of funding stormwater activities	Mitch
20-Jul-22	Report	Identify point person to attend C.3.j Forum at September 28 Development Committee meeting	Erin
20-Jul-22	Presentation	MRP 3.0 Checklist	Sandy M.
17-Aug-22	Review	Watershed Mgmt Areas Control Measures Loads Reduction Report (POC Loads Reduction Report)	Lisa W.
17-Aug-22	Review	Fish Risk Reduction Status Report	Karin
17-Aug-22	Review	WQIF grant application guidelines	Karin
17-Aug-22	Review	PCBs in Building Materials Report	Lisa W.
17-Aug-22	Approve	Final adjusted budget for FY 22/23	Mitch
17-Aug-22	Review	Draft Pyrethroid Baseline Monitoring Report	Lisa W
17-Aug-22	Report	Identify point person to attend C.3.j Forum at September 28 Development Committee meeting	Erin
17-Aug-22	Report	C.3 Update Handout (outward facing) and Memorandum for municipal staff (inward facing)	Yvana
12-Sep-22	Approve	Fish Risk Reduction Status Report	Karin
12-Sep-22	Approve	POC Loads Reduction Report	Lisa W.
12-Sep-22	Approve	PCBs in Building Materials Report	Lisa W.
12-Sep-22	Approve	Final Pyrethroid Baseline Monitoring Report	Lisa W
12-Sep-22	Approve	Annual Report, Appendix, Submittal Letter	Liz, all
21-Sep-22	Approve	Initial Mercury Monitoring Plan	Lisa W
21-Sep-22	Information	CASQA quarterly meeting registration request	Andrea
21-Sep-22	Presentation	Final report on HMP modeling	Yvana
21-Sep-22	Presentation	Approach to meeting trash requirements (trash load reduction table)	Liz
21-Sep-22	Report	Update on C.3 Guidebook	Yvana
18-Jan-23	Presentation	Update on Strategic Staffing Plan	Karin
18-Jan-23	Presentation	Update on whether to file a claim for unfunded mandates and Time Schedule Order	Karin
15-Feb-23	Approve	POC Monitoring Report (C.8.h.iv, due March 2023)	Lisa W.

Notes:

September 12, 2022 is a Special Meeting of the Management Committee to approve items necessary for the Annual Report to be submitted on time.