



**New Development Subcommittee
Proposed Agenda
August 2, 2011 – 1:30 to 3:30 pm
Redwood Shores Library, Meeting Room A
399 Marine Parkway
Redwood City**

- 1. Introductions, Announcements, Minutes & Agree on Agenda – Matt Fabry, All (5 min.)**
Objective: Meet attendees, review and approve previous meeting summary, make announcements, and agree on agenda.

- 2. Annual Reports**
 - a. Water Board Staff Comments on 2009/10 Annual Report, Section C.6 –** Laura Prickett, All (20 min.)
Objective: Review Water Board staff comments on the Construction Site Control (C.6) section of 09/10 Annual Reports and expectations for 10/11.

 - b. Debrief on July 20 Annual Report Workshop –** Laura Prickett, All (5 min.)
Objective: Hear whether everyone has had their questions answered, or if there are remaining questions about how to complete Annual Report Form sections C.3 and C.6.
Permit Compliance Date: Each agency's Annual Report is due by September 15.

- 3. Low Impact Development Requirements**
 - a. New Development Workshop –** Work group members (5 min.)
Objective: Hear the status of planning the October 6 New Development Workshop.
Action after meeting: Encourage applicable staff to attend the workshop.

 - b. Form LID Feasibility Guidance Work Group –** Laura Prickett, All (10 min)
Objective: Identify volunteers to work on user-friendly guidance for determining Low Impact Development feasibility, with Santa Clara and Alameda programs.
Action at meeting: Consider volunteering for the work group.

 - c. Proposed Bransten Rd. Green Street Project–** Laura Prickett, All (10 min)
Objective: Consider recommending the use of vehicle registration fees to partially fund proposed green street project in San Carlos.
Action at meeting: Make recommendation to the Technical Advisory Committee.

 - d. Update on Special Projects Criteria –** Laura Prickett, All (10 min)
Objective: Hear the outcome of Water Board staff's Special Projects negotiations with the Bay Area Stormwater Management Agencies Association.

- e. **Update on BASMAA Development Committee** - Matt, Laura, All (5 min)
Objective: Hear how the Bay Area Stormwater Management Agencies Association's Development Committee is proceeding on regional MRP tasks.

4. Construction Site Control

- a. **August 10 Training on Construction BMPs** – Laura Prickett, All (5 min.)
Objective: Reminder that the California Building Inspectors Group is partnering with the Countywide Program to offer construction BMP training, on August 10, in Redwood City.
Action after meeting: Encourage inspectors to attend the training.
- b. **Review Revised BMP Plan Sheet** – Laura Prickett, All (10 min.)
Objective: Review and approve the revised plan sheet.
Action at meeting: Approve the revised plan sheet.
- c. **Review Flyer on Architectural Copper BMPs** - Laura, All (10 min.)
Objective: Review the draft flyer, which is being prepared in collaboration with the Santa Clara Valley Urban Runoff Pollution Prevention Program.
Action after meeting: Provide written comments on the flyer.
- d. **Reminder to Provide Pre-Wet Season Notice before September 1** – Laura Prickett, All (5 min.)
Objective: Reminder or requirement to, by September 1, remind site developers/owners disturbing 1 acre or more of soil to prepare for the wet season.
Permit compliance date: Provide this reminder in August.
- e. **End of Construction General Permit Grandfathering** – Laura Prickett, All (5 min.)
Objective: Reminder that grandfathering of projects that were subject to the previous CGP ends September 2, 2011.
Permit compliance date: 9/2/11 for risk assessment of grandfathered capital projects.

5. Municipal Case Studies – All (10 min.)

- Objective: Share information and hear how other municipalities are implementing Provisions C.3 and C.6 of the MRP.*
Action before meeting: Identify C.3 or C.6 issues to share or ask about at the meeting.

6. Next Meeting – Matt, All (2 min.)

- Objective: Schedule next meeting for October 4, 2011.*

New Development Subcommittee (NDS)

Meeting Date: April 5, 2011

Present: David Huynh, Atherton; Gilbert Yao, Belmont; Matt Fabry, Brisbane and Program Coordinator; Kiley Kinnon and Jane Gomery, Burlingame; Muneer Ahmed, Colma and Half Moon Bay; Jeanne Naughton, Daly City; Fred Jarvis, EOA; Catherine Chan, Hillsborough; Shaun Mao, Menlo Park; Laura Russell, San Bruno; Gavin Moynahan, San Carlos; Ken Pacini, City of San Mateo; Camille Leung, County of San Mateo; and Rob Lecel, City of South San Francisco

Subcommittee Actions:

1. Approved meeting summaries from February and March meetings.
2. Agreed to review the Countywide Program's Construction Plan Sheet and Alameda County's updated version of this sheet and provide comments to Laura by April 19.
3. Agreed to develop a simple flyer describing the BMPs associated with architectural copper.
4. Agreed to distribute the draft C.3 compliance checklist as a word file for comments by the subcommittee.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None

Other Information/Announcements:

1. **Green Streets Guidebook.** Kevin Robert Perry on his own initiative updated and revised into a book format the San Mateo County Sustainable Green Streets and Parking Lots Design Guidebook. A copy of the updated guidebook has been added the Countywide Program's website.
2. **Conditions of Approval.** San Bruno developed new, revised conditions of approval that the subcommittee can use.
3. **Trainings.** About 40 building inspectors attended the March 17 training conducted by Matt Fabry and Laura Prickett through the local CalBIG organization. CalBIG is interested in providing additional training about BMP adequacy. One option to improve BMP knowledge is to attend the first day (April 26) of the Qualified SWPPP Practitioner/Developer training. Another option would be to attend another CalBIG training, which is currently scheduled for August 10.
4. **Construction Plan Sheet.** The following suggestions were made: add the word "construct" to the heading of the plan sheet; make the plan sheet information requirements not suggestions; use EPA's construction BMPs (concern was expressed about whether this information would translate into a plan sheet); have a sheet focused more for small projects and building inspectors and another plan sheet focused on construction for the construction inspectors. In one city the intent is to have the building inspectors trained well enough to know when to call the construction inspector.
5. **Reviewed Draft Low Impact Development Feasibility Report.** BASMAA's Development Committee is scheduled to approve the LID feasibility/infeasibility criteria report on April 7. The version of the report that is approved by the Development Committee will be available for the TAC to review and consider approving at the April 12 TAC meeting. TAC members/duly authorized representatives may provide their approval for submittal of the report after the TAC meeting. The report must be submitted to the Water Board by May 1. Information in the report was covered thoroughly during the New Development Subcommittee's special meeting on March 1.
6. **Update on Special Projects Criteria.** BASMAA has responded to the feedback received on its December 1, 2009 submittal by developing some transit oriented development (TOD) special project graduated LID reduction credits. The credits are based on the location of the project near a transit hub, the density of the development, and the amount of surface parking. BASMAA staff is presenting this information to the Water Board staff at a meeting on April 5. MTC and ABAG are supportive of the efforts regarding TOD.

7. **Architectural Copper BMPs.** Agencies will need to certify in this FY's annual report that "local ordinance authority is established to prohibit the discharge of wastewater to storm drains generated from the installation, cleaning, treating, and washing of the surface of copper architectural features, including copper roofs to storm drains." Some subcommittee members said that their towns have a number of new/remodeled homes that use copper. Often the copper is coated, but it is hard to coat all surfaces, such as downspouts.
8. **C.3 Compliance Checklist.** A work group consisting of Laura Russell, Lizzy Claycomb, and Laura Prickett drafted a comprehensive checklist. The checklist is intended to be completed by city staff and to follow the project as it moves through the city's approval process. The checklist would help to document accountability for different stages of project approval. Feedback from the subcommittee is needed on the range of projects that would be covered by the checklist and on whether having a checklist would be useful in their municipality. If the checklist is useful to many cities, it could be completed as a subcommittee project and, if not, the work group could complete it for its use.
9. **Applicability of C.3 and C.6 to School and Special District Projects.** Reviewed analysis conducted by the Alameda Countywide Clean Water Program's attorney Gary Grimm that was included in the agenda packet. Staff mentioned that they are not usually informed about school projects because the projects do not go to the cities for approval. Questions were raised about Mr. Grimm's analysis of the authority of a city to control school projects.
10. **Water Efficient Landscaping Model Ordinance and BAWCA Alternative.** This agenda topic was postponed because of a lack of time.

Work That Affects Other Subcommittees: Copper flyer would be of interest to CII Subcommittee's illicit discharge inspectors.

Next Steps:

- Develop an updated, draft Construction Plan Sheet(s) considering the subcommittee's comments.
- Distribute the draft C.3 compliance checklist as a word file for comments by the subcommittee and prepare a revised version of the checklist.
- Draft a flyer explaining the MRP's requirements for architectural copper.

Next Meeting: June 7, 2011, from 1:30 to 3:30 p.m., at the Redwood Shores Library in Redwood City.

New Development Subcommittee (NDS)

Meeting Date: June 7, 2011

Present: Gilbert Yao, Belmont; Matt Fabry, Brisbane and Program Coordinator; Kiley Kinnon, Burlingame; Muneer Ahmed, Colma and Half Moon Bay; Jeanne Naughton, Daly City; Laura Prickett, EOA; Catherine Chan, Hillsborough; Shaun Mao, Menlo Park; Elizabeth Claycomb, Pacifica; Chey Anne Brown, Portola Valley; Laura Russell, San Bruno; Gavin Moynahan, San Carlos; Ken Pacini, City of San Mateo; Camille Leung, County of San Mateo; and Cassie Prudhel, South San Francisco

Subcommittee Actions:

1. Agreed to update the existing tri-fold construction BMP flyers.
2. Finalized the C.3 compliance checklist.
3. Formed a work group to plan a New Development Workshop for the end of September. Work group members are: Camille Leung, Cassie Prudhel, Jane Gomery, and Laura Prickett.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None

Other Information/Announcements:

1. **Annual Reports.** Reviewed Water Board staff's comments on the Provisions C.3 and C.6 sections of the 2009/10 Annual Reports and expectations for the 2010/11 Annual Reports. BASMAA is expected to finalize the revised Annual Report template by the end of June.
2. **Potential Construction Work Group.** The Subcommittee advised that forming this work group would be useful, so construction site inspectors and construction data management staff could problem solve, share information, and help ensure compliance with Provision C.6.
3. **Construction BMP Plan Sheet.** A draft revision to the Countywide Program's construction BMP plan sheet was reviewed. The Subcommittee requested updates of the trifold BMP flyers.
4. **Construction Training.** With 56 attendees on Day 1, and 40 on Day 2, the QSD/QSP workshop evaluations showed the training was well received. Suggestions for future training include more examples of BMPs. The Program will partner with CalBIG to provide BMP training on August 10.
5. **New Development Workshop.** The Subcommittee recommended holding a late September workshop, focused on helping municipal staff implement the LID requirements that are effective December 1, 2011.
6. **C.3 Compliance Checklist.** Comments provided on the draft checklist were incorporated in the revised draft included in the meeting agenda packet.
7. **Pre-Wet Season Reminder.** Before September 1, the agencies must remind developers and owners of projects that disturb one acre or more of soil to prepare for the wet season. A sample letter was included in the agenda packet.
8. **Bay Area Hydrology Model.** After the April BAHM training, the question was raised as to whether the model should be upgraded for more San Mateo County-specific data. None of the attendees had heard from any BAHM users that this was a problem.
9. **BASMAA Development Committee.** The Committee will comment on a Special Projects proposal from Water Board staff at a June 20 meeting with Water Board staff. This proposal has extremely high density and lot coverage requirements for obtaining LID treatment reductions. The public comment period for the LID feasibility report and green roof specifications closes June 10. BASMAA is drafting a response to public comments on the Soil Specifications report.
10. **Hazardous Materials Form.** The Subcommittee was notified of a form on the Countywide Program's website that should be filled out during development review of a land use that will use or store hazardous materials.

Work That Affects Other Subcommittees: None

Next Steps:

- Email to the Subcommittee the draft Annual Report template. Comments are due June 10.
- Email to the Subcommittee a request for input from construction site inspectors and construction data management staff, to determine the most useful way to provide a countywide forum for them to problem solve, share information, and help ensure compliance with Provision C.6.
- Comments on the draft construction BMP plan sheet are due June 21.
- EOA will update the tri-fold construction BMP flyers.
- Email to the Subcommittee the Word file of the pre-wet season reminder letter.
- Email the Subcommittee to ask if there has been any feedback on the BAHM that would suggest there is a need for including more San Mateo County-specific data.

Next Meeting: August 2, 2011



California Regional Water Quality Control Board

San Francisco Bay Region



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Edmund G. Brown, Jr.
Governor

July 1, 2011

To: Municipal Regional Stormwater NPDES Permit (Order No. R2-2009-0074) Permittees

Sent via email to:

Jim Scanlin, Alameda Countywide Clean Water Program: jims@acpwa.mail.co.alameda.ca.us
Geoff Brosseau, Bay Area Stormwater Management Agencies Association: geoff@brosseau.us
Tom Dalziel, Contra Costa Clean Water Program: tdalz@pw.cccounty.us
George Hicks, City of Fairfield: ghicks@ci.fairfield.ca.us
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From: Thomas Mumley
Assistant Executive Officer

Subject: **Review of Municipal Regional Stormwater NPDES Permit (Order No. R2-2009-0074) 2010 Annual Report Sections for Provision C.4 - Industrial and Commercial Site Controls, Provision C.5 - Illicit Discharge Detection and Elimination, Provision C.6 - Construction Site Control, and Provision C.15 - Exempted and Conditionally Exempted Discharges**

We are sending this letter to all Permittees covered by the Municipal Regional Stormwater NPDES Permit (MRP). It provides a summary of our review of sections of the 2010 Annual Report associated with MRP Provision C.4 - Industrial and Commercial Site Controls, Provision C.5. Illicit Discharge Detection and Elimination, Provision C.6 - Construction Site Control, and Provision C.15 - Exempted and Conditionally Exempted Discharges. Specifically, we reviewed the following sections of the 2010 Annual Report:

- C.4.b. – Business Inspection Plan
- C.4.c.ii.(5), C.5.b., and C.6.b. – Enforcement Response Plan
- C.4.c.iii. – Reporting Requirements
- C.5.f.iii. – Tracking and Case Follow-up
- C.6.e.ii.(4) – Tracking of inspection data in electronic database or tabular format

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- C.6.e.iii. – Reporting for Construction Site Inspections
- C.15.b.iii. – Report on whether or not the Permittee is a water purveyor
- C.15.b.vi. – Report on efforts to promote measures that minimize run-off and pollutant loading from lawn watering and landscape irrigation practices.

Each of the provisions listed above is discussed in detail below, including the findings of the 2010 Annual Report review, and our expectations for the 2011 Annual Report.

General Comments

Findings

We recognize that 2009-2010 was a transitional year for reporting since the Annual Report covered two permits with very different reporting requirements. We encouraged all Permittees to incorporate work done under their previous permit into the MRP Annual Report format as much as possible.

Numerous spaces in the Annual Reports were left blank. In a number of instances, it was unclear if the blanks were oversights or not applicable.

Expectations for 2011 Annual Report

All the spaces in the Annual Report must be filled in with accurate information. If the answer is “0”, please state so. If the section is not applicable, please state so.

Provision C.4.b. – Business Inspection Plan

Findings

Almost all Permittees stated in their respective Annual Reports that they have developed and implemented a Business Inspection Plan. The Business Inspection Plan was not required to be submitted with the Annual Report. However, based on our inspections of six cities within the last 18 months, only one city’s Business Inspection Plan met the requirements in Provision C.4.b. of the MRP. Most of the Permittees inspected did not review their existing Business Inspection Plan after adoption of the MRP and therefore, some Plans did not describe the process for prioritizing inspections and frequency of inspections and others did not discuss the mechanisms to include newly opened businesses that warrant inspection.

Expectations for 2011 Annual Report

This is a reporting requirement only for the 2009-2010 reporting year. However, each Permittee must ensure that its Business Inspection Plan meets the requirements in C.4.b. If we inspect a municipality, we will review the Business Inspection Plan to verify compliance.

Provision C.4.c, Provision C.5.b., and Provision C.6.b. – Enforcement Response Plan

Findings

Almost all Permittees stated in their respective Annual Report that they have developed and implemented an Enforcement Response Plan (ERP) by April 1, 2010 as required by these Provisions. ERPs were not required to be submitted with the Annual Reports. However, based on the summary enforcement data in the Annual Reports, a few Permittees may have weak ERPs because there are too many enforcement levels before some type of written notice and/or verbal warning is issued for violations, including illicit discharges. Also, based on our review of the ERPs at the six cities we inspected within the last 18 months, these documents varied greatly as to compliance with MRP requirements. Common problems include a lack of timeframes for correction of problems for various

- Only 5 discharges reached the storm drain/waterbody, so Permittee stopped and cleaned-up the 5 discharges in a timely manner
- The other 15 reported discharges weren't substantiated upon investigation and/or require any resolution or clean-up.

For Style 3, we assume the data mean that the Permittee:

- Responded to all 20 discharges reported
- Only 5 discharges reached the storm drain/waterbody
- Cleaned-up and resolved 14 of the reported discharges
- Does this mean that 6 reported discharges were not substantiated?
- Were all 5 discharges reaching storm drains and/or receiving waters stopped and cleaned?

Expectations for 2011 Annual Report

We are working with BASMAA to resolve the inconsistencies and ambiguities of this Provision in the Annual Report template. But we will not reach a conclusion before the 2011 Annual Reporting period concludes. Therefore, all Permittees must continue to summarize the specific results from its illicit discharge complaint and response program as listed in Annual Report template. The Permittees should also provide a narrative explanation that clearly explains the Permittees implementation of its illicit discharge complaint and response program, and how they are reporting the data points relative to the styles explained above or another style.

Provision C.6.e.iii. – Reporting for Construction Site Inspections

Findings

This Provision requires the Permittee to summarize specific results of its construction site inspection, enforcement, and follow-up.

C.6.e.iii.(1)(a) requires the Permittee to report the number of sites disturbing less than one acre that required inspections. These sites are considered high priority (*C.6.e.ii.(2)(b)*) and must be inspected monthly during the rainy season (October – April) until the site is fully stabilized by landscaping or the installation of permanent erosion control measures. It appeared that many Permittees entered the total number of sites less than one acre that they inspected but were not necessarily considered high priority. *C.6.e.ii.(2)(b)* lists factors to be considered for determining high priority sites. In our focused review of the 18 Permittees' construction data, a couple of Permittees considered all sites triggering *C.3.* and all sites pulling a grading permit as high priority. Permittees must determine their high priority sites and implement the inspection requirements in the MRP. Sites disturbing less than one acre of soil that are not considered high priority by the Permittee should not be reported here.

C.6.e.iii.(1)(b) requires the Permittee to report the number of sites disturbing greater than or equal to one acre of soil. These sites must be inspected monthly during the rainy season until the site is fully stabilized by landscaping or the installation of permanent erosion control measures.

C.6.e.iii.(1)(c) requires the Permittee to report the total number of construction stormwater inspections conducted. This number must include the total number of inspections conducted at high priority sites and at sites disturbing one or more acre of soil, and should not include additional inspections of sites that do not fall into these categories. Many Permittees also inspect sites that do not fall in either of those two categories. Permittees may take credit for these inspections by providing the number and description of these additional inspections in the Comment row just below

this section of the Annual Report. We could not determine from this data point in the completeness review whether or not all high priority sites and all sites disturbing one or more acre of soil were inspected from October through April, through all phases of construction. In our focused review of the 18 Permittees' construction data, most of the Permittees missed monthly inspections at different sites and it was not clear that most of the Permittees inspected through all phases of construction.

C.6.e.iii.(1)(d) requires the Permittee to report the number and percentage of violations in each of the six BMP categories listed in C.6.c.i. During the development of the Annual Report template, we and BASMAA agreed to count all violations in a BMP category as "one" violation per inspection per site regardless of how many violations occurred in the BMP category. This agreement is reflected in the directions for filling out the Annual Report. It appears that the Permittees who collected and reported these data, followed the reporting direction.

C.6.e.iii.(1)(e) requires the Permittee to report the number and percentage of each type of enforcement action taken as listed in each Permittee's ERP. All Permittees listed the number and percentage of each level of enforcement actions taken and most Permittees listed the specific enforcement action (per the individual Enforcement Response Plan) for each level.

C.6.e.iii.(1)(f) requires the Permittee to report the number of discharges, actual and those inferred through evidence, of sediment or other construction related materials. Almost all Permittees reported a number for this requirement.

C.6.e.iii.(1)(g) requires the Permittee to report the number of sites with discharges, actual and those inferred through evidence, of sediment or other construction related materials. Almost all Permittees reported a number for this requirement.

C.6.e.iii.(1)(h) requires the Permittee to report the number and percentage of violations fully corrected prior to the next rain event but no longer than 10 business days after the violations are discovered or otherwise considered corrected in a timely, though longer period. Almost all Permittees reported a number for this requirement.

C.6.e.iii.(1)(i) requires the Permittee to report the number of violations not fully corrected 30 days after the violations are discovered. Most Permittees reported "0". However, a few Permittees reported violations not fully corrected 30 days after the violations are discovered. None of these Permittees provided an explanation as to why the violations were not fully corrected 30 days after the violations were discovered or if those violations were ever fully corrected. Permittees who have violations not fully corrected 30 days after the violations are discovered should provide a narrative explanation to give a good picture of quality of their programs and how their program is complying with the MRP.

Expectations for 2011 Annual Report

All the required information discussed in detail above shall be reported.

Provision C.6.e.ii.(4) – Tracking of Construction Inspection Data in Electronic Database or Tabular Format

Findings

This Provision requires the Permittee to track certain information in an electronic database or tabular format all inspections. An example tabular format was included in the Fact Sheet of the MRP. A couple of countywide programs, on behalf of their member Permittees, and some individual Permittees enhanced the example tabular format to facilitate more efficient Annual Reporting and to

clearly document MRP compliance. We appreciate the information provided in the enhanced electronic/tabular formats.

We conducted a focused review of this specific Provision to determine how the Permittees were implementing the Provision. We randomly selected the following 18 Permittees and requested that they submit their 2009-2010 construction inspection data recorded in their electronic database/tabular format.

Alameda	Alameda County	Concord
Contra Costa County	Cupertino	Daly City
Dublin	Fremont	Menlo Park
Millbrae	Newark	Orinda
Palo Alto	Redwood City	San Jose
Santa Clara County	Union City ¹	Walnut Creek

Most of the construction inspection data covered the Permittees' compliance with their respective previous permit (July 1, 2009 – November 30, 2009) and with the MRP (December 1, 2009 – June 30, 2010). While we did review all of the data submitted, we primarily focused on the inspections conducted from December 2009-April 2010, the rainy season after the MRP implementation date.

Review of the data showed the following:

1. 7 out of the 18 Permittees had the electronic database/tabular format exactly as required by the MRP;
2. 14 out of the 18 Permittees inspected as required by the MRP;
3. 3 out of the 18 Permittees submitted an amendment to their Annual Report as a result of the data request;
4. 2 out of the 18 Permittees' electronic database/tabular data matched the data reported in their respective Annual Reports;
5. 10 Permittees also inspected outside of the rainy season, with 3 of these 10 Permittees inspecting year round;
6. 125 of the 158 violations counted in the data sets had clear dates as to when the corrective actions were verified;
7. Of these 125 violations that had clear correction dates, 92 of these corrections occurred within 3 days of discovering the violations;
8. 76 of those 92 violations that were corrected within 3 days belonged to sites in the cities of Cupertino, Fremont, San Jose, and Walnut Creek; and
9. The cities of Alameda, Cupertino, Fremont, San Jose, and Walnut Creek had robust data sets that significantly enhanced our understanding of the quality of their programs and how they were implementing their programs.

Following is a discussion on the columns that some Permittees seemed to have trouble filling out in the electronic database/tabular format:

¹ We included the table obtained from our inspection of Union City's C.6. Program.

- Has there been rainfall with runoff since the last inspection? – Was there rain that flowed into the storm drain at anytime between inspections? This is a “Yes/No” question that is site and rain event dependent. It may be a question that needs to be asked during the inspection.
- Illicit discharge – An illicit discharge is defined as any discharge to the municipal separate storm sewer system that is not composed entirely of storm water, except for discharges allowed under an NPDES permit or waters used for firefighting operations.
- Six BMP Categories – Please review Appendix 5: Glossary of CASQA’s “Stormwater Best Management Practice Handbook Portal: Construction” for definitions of the six BMP categories. During the Annual Report template development process, it was agreed upon to count one violation in a BMP category for each site and inspection regardless of how many violations occurred in the BMP category.
- Resolution of Problems noted using the following three standardized categories: Problems Fixed, Needs More Time, and Escalate Enforcement – “Problems Fixed” gets entered into this column if corrective actions are completed with the timeframe specified by the inspector. “Needs More Time” gets entered into this column if the violations are **not corrected** by the specified timeframe but there is a valid reason. Please note that the General Construction Permit requires erosion and sediment control supplies to be kept on site. “Escalate Enforcement” gets entered into this column if the violations are not corrected by the specified timeframe and there is not a valid reason.
- Comments, which shall include all rationales for longer compliance time, all escalation in enforcement discussions, and any other information that may be relevant to that site inspection – “Any other information” should include statements on construction phase (i.e. site grading, building, finishing of lots, and landscaping) and discussions on corrective actions, and type of inspection (i.e. pre rainy, monthly, reinspection, and complaint). If violations are fixed immediately or the same day, say so in this column.

Expectations for 2011 Annual Report

This information is not required to be submitted in the Annual Report but must be available, if requested by us. All the required information must be entered into the electronic database/tabular format. Permittees must also ensure that the data and information in the Annual Reports are accurately documented in their electronic database/tabular format; and ensure that the electronic databases/tabular formats clearly document that they are meeting the MRP requirements for inspections through all phases of construction, frequency of inspection, recordation of inspection information, and verification of corrective actions.

Provision C.15.b.iii. – Water Purveyor Status, and Planned and Unplanned Discharges

Findings

This Provision requires those Permittees who are also water purveyors to report certain information on their planned and unplanned discharges.

Our review of the Annual Reports shows that 22 of the Permittees are also water purveyors: Brisbane, Burlingame, Daly City, Foster City, Hayward, Hillsborough, Livermore, Menlo Park, Martinez, Millbrae, Milpitas, Mountain View, Palo Alto, Pleasanton, Redwood City, San Bruno, San Jose, Santa Clara, Santa Clara County, Santa Clara Valley Water District, Sunnyvale, and Zone 7.

San Mateo County, 2009/2010 Annual Report Review, Provisions C.4., C.5, C.6., and C.15

(Data for December 2009-June 2010 only)

Provision No.	Atherton	Belmont	Brisbane	Burlingame	Colma	Daly City	E Palo Alto	Foster City	Half Moon Bay	Hillsborough	Menlo Park
Level 2 Enforcement Action, #	0	Blank	Warning Notice 1	2	Written Notice was issued 4	Notice to Comply 2	Blank	NOV 1	Written Notice 3	Written Warning/NOV 0	Written Warning/NOV 1
Level 3 Enforcement Action, #	0	Blank	Combination of Formal & Informal Notices			NOV 4	Blank	Blank	Blank	Stop Work Notice 0	Violation Citation/ Stop Work
Level 4 Enforcement Action, #	0	Blank	Legal Notice			Legal Notice/Stop Work Order 2	Blank	Blank	Blank	Legal Action 0	Legal Action
Facilities needing NOI coverage?	NA	0	0	0	0	0	0	0	0	0	0
C.5.b. ERP											
Was the ERP developed and implemented by April 1, 2010?	No (Anticipates to be done 12/31/10)	Yes	Yes	Yes	Yes	Yes	No	Yes	No, will be done by 12/15/10	Yes	No ⁴
C.5.f. Tracking and Case Follow-up											
# of discharges reported	0	6	8	27	3	41	0 ³	4	1	1	1
# of discharges reaching storm drains and/or receiving water	0	0	7	0	3	36	0	0	1	0	0
# of discharges resolved in a timely manner	Blank	6	8	NA	3	41	0	4	1	1	1
C.6.b. ERP											
Was the ERP developed and implemented by April 1, 2010?	Yes	Yes	Yes	Yes	Yes	Yes	No	Blank	Marked yes but writes that it will be developed by 12/15/10	Yes	No ⁴
C.6.e.(4).iii. Reporting											
Total # of active sites disturbing < 1 acre	Blank	21	0	4	0	1	2	0	Blank	1	2

San Mateo County, 2009/2010 Annual Report Review, Provisions C.4., C.5, C.6., and C.15

(Data for December 2009-June 2010 only)

Provision No.	Atherton	Belmont	Brisbane	Burlingame	Colma	Daly City	E Palo Alto	Foster City	Half Moon Bay	Hillsborough	Menlo Park
Total # of active sites disturbing ≥ 1 acre	Blank	0	5	1	3	1	0	0	Blank	1	70
Total # of inspections conducted	Blank	21	25	28	10	6	5	0	Blank	2	216
# of violations in each of the six categories											
Erosion Control	Blank	Blank	0	0	2	3	2	Blank	Blank	0	1
Run-on & Run-off Control	Blank	Blank	0	0	0	0	0	Blank	Blank	0	0
Sediment Control	Blank	Blank	0	0	16	0	0	Blank	Blank	0	3
Active Treatment System	Blank	Blank	0	0	0	0	0	Blank	Blank	0	0
Good Site Management	Blank	Blank	0	0	2	1	0	Blank	Blank	0	1
Non SW Management	Blank	Blank	0	0	0	0	0	Blank	Blank	0	0
# of enforcement action taken as listed in each Permittee's ERP											
Level 1, #	Blank	Blank	0	None ²	Verbal Warning 7	Verbal Notice	Verbal Warning 2	Blank	Blank	Verbal Warning 0	Educational letter or conversation 2
Level 2, #	Blank	Blank	0	None ²	Written Notice 1	Notice to Comply 4	0	Blank	Blank	Written Warning/NOV 0	Violation Letter 1
Level 3, #	Blank	Blank	0	None ²	Blank	NOV	0	Blank	Blank	Stop Work Notice 0	Police Code Violation Citation
Level 4, #	Blank	Blank	0	None ²	Blank	Stop Work Notice	0	Blank	Blank	Legal Action 0	Criminal Prosecution
# of discharges	Blank	1	0	0	0	2	0	Blank	0	0	1
# of sites with discharges	Blank	Blank	0	0	0	1	0	Blank	0	0	1
# of violations corrected w/in goal period	Blank	1	NA	0	20	4	2	Blank	Blank	0	3
# of violations not fully corrected w/in 30 days	Blank	Blank	Blank	Blank	0	0	0	Blank	Blank	Blank	0

San Mateo County, 2009/2010 Annual Report Review, Provisions C.4., C.5, C.6., and C.15

(Data for December 2009-June 2010 only)

Provision No.	Millbrae	Pacifica	Portola Valley	Redwood City	San Bruno	San Carlos	San Mateo County	San Mateo	S San Francisco	Woodside
Level 2 Enforcement Action, #	Blank	Warning 1	Warning Notice	Warning Notice	Warning Notice 22	0	Informal Action: Warning Notice 1	NOV 18	Administrative Citation 2	NOV
Level 3 Enforcement Action, #	Blank	Formal/ Informal Written Notice	Informal/ Formal Notice	Informal/ Formal Notice	Informal/ Formal Notice	0	Formal Action: NOV		Cease & Desist Order/Notice to Abate	Notice to Comply
Level 4 Enforcement Action, #	Blank	Legal Notice	Legal Notice	Legal Notice	Legal Notice	0	Formal Action: Admin Enforcement Order/DA		Criminal Penalties/Civil Injunctions	Legal Action
Facilities needing NOI coverage?	0	0	0	Blank	0	0	1	0	0	0
C.5.b. ERP										
Was the ERP developed and implemented by April 1, 2010?	Yes	Yes	Yes	No, anticipates completion by 12/31/10	Yes	Yes	Yes	Yes	Yes	Yes
C.5.f. Tracking and Case Follow-up										
# of discharges reported	Blank ⁵	3	0	Blank	13	0	6	24	25	0 ⁸
# of discharges reaching storm drains and/or receiving water	Blank ⁵	1	0	Blank	13	0	6	1	17	0
# of discharges resolved in a timely manner	Blank ⁵	10	0	Blank	13	NA	6	24	25	0
C.6.b. ERP										
Was the ERP developed and implemented by April 1, 2010?	Yes	Yes	Yes	No, anticipates completion by 12/31/10	Yes	Yes	Yes	Yes	Yes	Yes
C.6.e.(4).iii. Reporting										
Total # of active sites disturbing < 1 acre	1	24	21	88	228	Unknown	Not Tracked	0	1	76

San Mateo County, 2009/2010 Annual Report Review, Provisions C.4., C.5, C.6., and C.15

(Data for December 2009-June 2010 only)

Provision No.	Millbrae	Pacifica	Portola Valley	Redwood City	San Bruno	San Carlos	San Mateo County	San Mateo	S San Francisco	Woodside
Total # of active sites disturbing ≥ 1 acre	3	3	0	2	2	Unknown	Not Tracked	6	3	0
Total # of inspections conducted	NA	20	21	90	350	Unknown	Not Tracked	6	21	76
# of violations in each of the six categories										
Erosion Control	Blank	1	0	1	0	Blank	Blank	Blank	7	8
Run-on & Run-off Control	Blank	4	0	0	1	Blank	Blank	Blank	4	1
Sediment Control	Blank	3	4	0	6	Blank	Blank	3	0	3
Active Treatment System	Blank	0	0	0	0	Blank	Blank	Blank	0	13
Good Site Management	Blank	1	0	3	2	Blank	Blank	Blank	2	2
Non SW Management	Blank	1	0	0	0	Blank	Blank	Blank	0	0
# of enforcement action taken as listed in each Permittee's ERP										
Level 1, #	Blank	Verbal 2	Verbal Warning 5	Verbal Notice 3	10-day Notice to Correct (Courtesy) 9	Verbal Warning/ Written Warning/NOV	Blank	Verbal Warning 3 ⁶	Verbal Warning/ Warning Letter/ Compliance Meeting 14 ⁷	Verbal Warning 27/100
Level 2, #	Blank	Written 1	Written Warning 1	Warning Notice/NOV	10-day Notice to Correct (Violation)	Notice to Comply	Blank	Blank	Administrative Citation	NOV
Level 3, #	Blank	NOV 3		Stop Work Order 1	Administrative Citation	Legal Action	Blank	Blank	Stop Work Order/Notice to Abate	Notice to Comply
Level 4, #	Blank	Escalating Enforcement 2		Legal Notice	Legal Action		Blank	Blank	Criminal Penalties/Civil Injunctions	Legal Action
# of discharges	Blank	3	0	Blank	0	0	1	3 ⁶	1 ⁷	0
# of sites with discharges	Blank	3	0	Blank	0	0	1	2 ⁶	1	0
# of violations corrected w/in goal period	Blank	6	6	4	9	0	1	3	9 ⁷	27
# of violations not fully corrected w/in 30 days	Blank	2, Why not?	0	Blank	0	Blank	Blank	Blank	0	0

San Mateo County, 2009/2010 Annual Report Review, Provisions C.4., C.5, C.6., and C.15

(Data for December 2009-June 2010 only)

Provision No.	Millbrae	Pacifica	Portola Valley	Redwood City	San Bruno	San Carlos	San Mateo County	San Mateo	S San Francisco	Woodside
C.15.b.iii.										
Is the Permittee a water purveyor?	Yes	No	No	Yes	Yes	No	Blank	No	No	No
Data sampling for planned and unplanned discharges for water purveyor	Just chlorine residual	NA	NA	No sampling data	No sampling data	NA	No Data	NA	NA	NA
C.15.b.vi.										
Report on efforts to promote measures that minimize runoff and pollutant loading from lawn watering and landscape irrigation practices	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

¹ Belmont – Assumes corrective actions for C.4. done during inspection unless there is a reinspection date. Working with SMCEH.

² Burlingame – For C.4, explain why all violations were not corrected in a timely manner. Most discovered C.6. problems are informally corrected in a timely manner. Use dechlorination tablets downstream but no sampling. In the process of developing new procedure to sample.

³ East Palo Alto – C.5. summary discusses construction site violations.

⁴ Menlo Park – Did not develop ERPs pursuant to Provisions C.4., C.5., and C.6. MRP but has been implementing established levels of enforcement through its Municipal Code. As of the date of Annual Report submittal, the City has detailed its enforcement policy in the ERP template developed by the Countywide Program. For C.4., perhaps actual and potential discharges were counted discreetly since the numbers don't match the number of violations or the enforcement actions conducted.

⁵ Millbrae – Did not transfer C.5. data from Tracking Spreadsheet to Annual Report table.

⁶ San Mateo – 3 illicit discharges in C.6. were issued verbal warnings and it appears that one site had 2 separate illicit discharge incident.

⁷ South San Francisco – For C.6., 1 illicit discharge issued Level 1 enforcement; Reported 14 Level 1 enforcement actions, and only 9 corrected within the goal period with no explanation.

⁸ Woodside – For C.5., says that Town responded to 7 reported violations and gave verbal warnings. But data not recorded in the table.

⁹ Colma, Half Moon Bay – For C.4., explain why violations were not resolved in a timely manner.

¹⁰ Daly City, Half Moon Bay, Pacifica, Portola Valley – For C.4., perhaps counting discreet violations for actual and potential discharges since numbers do not match the number of violations or the type of enforcement actions conducted.

C.3.b.v.(1) ► Regulated Projects Reporting Table

Fill in attached table C.3.b.v.(1) or attach your own table including the same information. **Guidance: Refer to footnotes in the table for instructions on how to complete the table. Do not leave any cells blank. For example, enter zero or N.A. as appropriate. If a Permittee did not approve any Regulated Projects during the reporting period (fiscal year), then the Permittee should state so here or in the C.3.b.v.(1) Reporting Table.**

C.3.c. Low Impact Development Reporting

Guidance: There are no specific permittee reporting requirements for this section. Countywide program annual reports and/or a BASMAA summary report will describe the submittals made during FY 10-11 (i.e., Biotreatment Soil Specifications, Special Projects Proposal, Feasibility/Infeasibility Criteria Report, and Green Roof Specifications). However, permittees may report on any assistance provided by their staff for these and other countywide or regional efforts, for example, participation on a countywide program and/or regional Development Committee or work groups, development of countywide guidance documents, etc.

C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

(1) Fill in attached table C.3.h.iv.(1) or attach your own table including the same information. **Guidance: Do not leave any cells blank. For example, enter zero or N.A. as appropriate.**

(2) On an annual basis, provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.

Summary:

Guidance: 1) Water Board staff in their April 11, 2011 annual report review letter indicated that a self-inspection by owners/operators of treatment and HM controls is not acceptable as a municipal O&M verification inspection. Inspections must be conducted by permittee staff and/or contractor under direction of the permittee. 2) If a permittee did not inspect any Regulated Projects during FY 10-11 because there are no Regulated Projects within the permittee’s jurisdiction or because no stormwater treatment or HM controls have been built yet for Regulated Projects within the permittee’s jurisdiction, the permittee should state that here.

(3) On an annual basis, provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).

Summary:

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Project Location ³ , Street Address	Name of Developer	Project Phase No. ⁴	Project Type & Description ⁵	Project Watershed ⁶	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²)	Total Replaced Impervious Surface Area (ft ²)	Total Pre- Project Impervious Surface Area ⁷ (ft ²)	Total Post- Project Impervious Surface Area ⁸ (ft ²)
Private Projects											
Public Projects											
Comments: Guidance: If necessary, provide any additional details or clarifications needed about listed projects in this box.											

³ Include cross streets

⁴ If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

⁵ Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

⁶ State the watershed(s) in which the Regulated Project is located. Optional but recommended: Also state the downstream watershed(s).

⁷ For redevelopment projects, state the pre-project impervious surface area.

⁸ For redevelopment projects, state the post-project impervious surface area.

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Application Deemed Complete Date ⁹	Application Final Approval Date ⁹	Source Control Measures ¹⁰	Site Design Measures ¹¹	Treatment Systems Approved ¹²	Operation & Maintenance Responsibility Mechanism ¹³	Hydraulic Sizing Criteria ¹⁴	Alternative Compliance Measures ^{15/16}	Alternative Certification ¹⁷	HM Controls ^{18/19}
Private Projects										

Comments:
Guidance: If necessary, provide any additional details or clarifications needed about listed projects in this box.

⁹ For private projects, state project application deemed complete date and final discretionary approval date.
¹⁰ List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.
¹¹ List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.
¹² List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).
¹³ List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners’ association; O&M by public entity, etc…) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.
¹⁴ See Provision C.3.d.i. “Numeric Sizing Criteria for Stormwater Treatment Systems” for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).
¹⁵ For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.
¹⁶ For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.
¹⁷ Note whether a third party was used to certify the project design complies with Provision C.3.d.
¹⁸ If HM control is not required, state why not.
¹⁹ If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.b.v.(1) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Is Funding Committed? ²⁰	Date Construction Scheduled to Begin ²⁰	Source Control Measures ²¹	Site Design Measures ²²	Treatment Systems Approved ²³	Operation & Maintenance Responsibility Mechanism ²⁴	Hydraulic Sizing Criteria ²⁵	Alternative Compliance Measures ^{26/27}	Alternative Certification ²⁸	HM Controls ^{29/30}
Public Projects										

Comments:
Guidance: If necessary, provide any additional details or clarifications needed about listed projects in this box.

²⁰ For public projects, enter “Yes” or “No” under “Is Funding Committed?” and enter a date under “Date Construction Scheduled to Begin”.

²¹ List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²² List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

²³ List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

²⁴ List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners’ association; O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

²⁵ See Provision C.3.d.i. “Numeric Sizing Criteria for Stormwater Treatment Systems” for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

²⁶ For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

²⁷ For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

²⁸ Note whether a third party was used to certify the project design complies with Provision C.3.d.

²⁹ If HM control is not required, state why not.

³⁰ If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Fill in table below or attach your own table including the same information. **Guidance: Permit requires permittees to provide a list of all newly installed BMPs to vector control agencies on an annual basis before the wet season, i.e., October 1. Countywide programs intend to submit these tables to vector control agencies to fulfill this requirement. The facility name, address, responsible party and type of treatment/HM control should be provided for all BMPs installed during this fiscal year. If a newly installed BMP has not yet had an inspection, indicate N/A in the columns pertaining to inspection information.**

Name of Facility/Site Inspected	Address of Facility/Site Inspected	Newly Installed? (YES/NO) ³¹	Party Responsible ³² For Maintenance	Date of Inspection	Type of Inspection ³³	Type of Treatment/HM Control(s) Inspected ³⁴	Inspection Findings or Results ³⁵	Enforcement Action Taken ³⁶	Comments

³¹ Indicate “YES” if the facility was installed within the reporting period, or “NO” if installed during a previous fiscal year.

³² State the responsible operator for installed stormwater treatment systems and HM controls.

³³ State the type of inspection (e.g., 45-day, routine or scheduled, follow-up, etc.).

³⁴ State the type(s) of treatment systems inspected (e.g., bioretention facility, flow-through planter, infiltration basin, etc...) and the type(s) of HM controls inspected, and indicate whether the treatment system is an onsite, joint, or offsite system.

³⁵ State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).

³⁶ State the enforcement action(s) taken, if any, as appropriate and consistent with your municipality’s Enforcement Response Plan.

Permittee Name: _____

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.1.a, b, c ▶ Site/Inspection Totals		
Number of sites disturbing < 1 acre of soil requiring storm water runoff quality inspection (i.e. High Priority) (C.6.e.iii.1.a)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.b)	Total number of storm water runoff quality inspections conducted (C.6.e.iii.1.c)
#	#	#
<p>Guidance: This is the total number of SITES considered high priority, which triggers a requirement for monthly inspection during the rainy season. Please see MRP for discussion of what sites are considered high priority sites. Sites disturbing less than one acre of soil that are not considered high priority by the Permittee should not be reported here.</p>	<p>Guidance: This is the total number of SITES that disturb one or more acres of soil and are inspected monthly during the rainy season.</p>	<p>Guidance: This is the total number of INSPECTIONS conducted at high priority sites and at sites disturbing one or more acres of soil. Do not list inspections that are conducted at sites that are not within these two categories.</p>
<p>Comments:</p> <p>Guidance:</p> <ol style="list-style-type: none"> 1) Provide explanatory details about the data reported above if necessary. 2) Provide the number of inspections that are conducted at sites not within the above categories as part of your agency's inspection program and a general description of those sites (optional). 		

Permittee Name: _____

C.6.e.iii.1.d ▶ Construction Activities Storm Water Violations		
BMP Category	Number of Violations ⁴⁰	% of Total Violations ⁴¹
Erosion Control		
Run-on and Run-off Control		
Sediment Control		
Active Treatment Systems		
Good Site Management		
Non Stormwater Management		
Total		100%

C.6.e.iii.1.e ▶ Construction Related Storm Water Enforcement Actions			
	Enforcement Action (as listed in ERP) ⁴²	Number Enforcement Actions Taken	% Enforcement Actions Taken ⁴³
Level 1			
Level 2			
Level 3			
Level 4			
Total			100%

C.6.e.iii.1.f, g ▶ Illicit Discharges	
	Number
Number of illicit discharges, actual and those inferred through evidence (C.6.e.iii.1.f)	
Number of sites with discharges, actual and those inferred through evidence (C.6.e.iii.1.g)	

⁴⁰ Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category.

⁴¹ Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

⁴² Agencies should list the specific enforcement actions as defined in their ERPs.

⁴³ Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

Permittee Name: _____

C.6.e.iii.1.h, i ► Violation Correction Times		
	Number	Percent
Violations fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)		% ⁴⁴
Violations not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)		% ⁴⁵
Total number of violations for the reporting year ⁴⁶		100%
<p>Comments:</p> <p>Guidance: Provide an explanation for each violation not resolved within 10 days or otherwise deemed resolved in a longer but still timely manner. Permittees who list violations not fully corrected within 30 days after violations are discovered should provide an explanation of how their program is complying with the MRP.</p>		

C.6.e.iii.(2) ► Evaluation of Inspection Data
Describe your evaluation of the tracking data and data summaries and provide information on the evaluation results (e.g., data trends, typical BMP performance issues, comparisons to previous years, etc.).
Description:

C.6.e.iii.(2) ► Evaluation of Inspection Program Effectiveness
Describe what appear to be your program’s strengths and weaknesses, and identify needed improvements, including education and outreach.
Description:
Guidance: Evaluate your construction inspection program and summarize efforts conducted by your municipality in FY 10-11 to implement MRP requirements, such as: 1) revised stormwater construction inspection forms and inspection data tracking tools; 2) revised operating procedures and provided training to inspectors; 3) conducted inspections with the new forms; 4) participated in the countywide program’s committees/work groups; and 5) participated in the BASMAA Development Committee (if applicable). Refer to the C.6 Construction Site Control section of countywide program’s FY 10-11 Annual Report for a description of activities at the countywide or regional level.

⁴⁴ Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.

⁴⁵ Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.

⁴⁶ Total number of violations equals the number of initial enforcement actions (i.e. one violation issued for several problems during an inspection at a site). It does not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

C.6.f ▶ Staff Training Summary				
Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance

DRAFT

2011 New Development Workshop

**Complying with the New Low Impact
Development (LID) Requirements**

**Mission Blue Conference Center
475 Mission Blue Drive, Brisbane
Thursday, October 6, 2011**

Agenda

Early Registration for Basic Training (and Refreshments)	8:00 – 8:15
Basic Training on Stormwater Post-Construction Controls <i>Learn (or refresh your memory) about pre-MRP stormwater requirements and key concepts such as stormwater treatment, hydromodification management, etc.</i> Laura Prickett – EOA, Inc.	8:15 – 9:00
Registration and Refreshments (for registrants not attending Basic Training)	9:00 – 9:20
Introductory Remarks Matt Fabry – <i>San Mateo Countywide Water Pollution Prevention Program</i>	9:20 – 9:30
Overview of New Low Impact Development (LID) Requirements Laura Prickett – EOA, Inc.	9:30 – 10:15
How to Determine LID Feasibility and Infeasibility Lisa Austin – <i>Geosyntec</i>	10:15 – 10:45
BREAK	10:45 – 11:00
Exercise: Determine LID Feasibility at an Example Project Laura Prickett – EOA, Inc.	11:00 – 11:30

Rainwater Harvesting for C.3 Compliance Examples Lisa Austin – <i>Geosyntec</i>	11:30 – 12:00
LUNCH (provided on site)	12:00 – 1:00
Burlingame Green Street Bioinfiltration Treatment Measures Jane Gomery – <i>City of Burlingame</i>	1:00 – 1:30
Pervious Paving Installation Case Study TBD	1:30 – 2:00
Surviving a Regional Water Board Provision C.3 Audit San Bruno Staff	2:00 – 2:30
Break	2:30 – 2:40
Reviewing the C.3 Submittals for a Regulated Project <i>[Potentially include the C.3 Compliance Form?]</i> TBD: Municipal Staff	2:40 – 3:10
Examples of Projects that Meet Draft Special Projects Criteria TBD: Municipal Staff	3:10 – 3:30
Closing Remarks Matt Fabry – <i>San Mateo Countywide Water Pollution Prevention Program</i>	3:30 – 3:35

Special Projects *(BASMAA Redline 7/11/11)*

Allow certain categories of land development projects (Special Projects) to meet the C.3.d. stormwater treatment requirements with the following non-LID treatment systems that meet certain filtration minimum specifications (TBD):

- Tree-box-type high flowrate biofilters
- Vault-based high flowrate media filters

Special Projects Categories:

Category A1: Projects must meet the following criteria:

- Built as part of a municipality's stated objective to preserve or enhance a pedestrian-oriented type of urban design.
- Located in a municipality's designated central business district, downtown core area or downtown core zoning district, neighborhood business district or comparable pedestrian-oriented commercial district, or historic preservation site and/or district.
- Create and/or replace $\leq \frac{1}{2}$ acre of impervious surface area.
- Include zero surface parking (except for incidental surface parking)¹.
- Have at least 85% coverage for the entire project site by permanent structures. The remaining 15% portion of the site is to be used for safety access, parking structure entrances, trash and recycling service, utility access, pedestrian connections, public uses, landscaping, and stormwater treatment.

100% LID reduction credit for all projects – Allow 100% non-LID treatment onsite for all projects described by Category A1.

Category A2: Projects must meet the following criteria:

- Built as part of a municipality's stated objective to preserve or enhance a pedestrian-oriented type of urban design.
- Located in a municipality's designated central business district, downtown core area or downtown core zoning district, neighborhood business district or comparable pedestrian-oriented commercial district, or historic preservation site and/or district.
- Create and/or replace $> \frac{1}{2}$ acre and ≤ 1 acre of impervious surface area.
- Include zero surface parking.
- Have at least 85% coverage for the entire project site by permanent structures. The remaining 15% portion of the site is to be used for safety access, parking structure entrances, trash and recycling service, utility access, pedestrian connections, public uses, landscaping, and stormwater treatment.

¹ Incidental surface parking allowed for emergency vehicle access, ADA accessibility, and passenger and freight loading zones.

50% LID Reduction Credit

- Allow 50% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs \geq 2:1.
- Allow 50% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~60~~50 DU/acre.

75% LID Reduction Credit

- Allow 75% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs $>$ 3:1.
- Allow 75% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~90~~75 DU/acre.

100% LID Reduction Credit

- Allow 100% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs $>$ 4:1.
- Allow 100% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~120~~100 DU/acre.

Category A3: Projects must meet the following criteria:

- Built as part of a municipality's stated objective to preserve or enhance a pedestrian-oriented type of urban design.
- Located in a municipality's designated central business district, downtown core area or downtown core zoning district, neighborhood business district or comparable pedestrian-oriented commercial district, or historic preservation site and/or district.
- Create and/or replace $>$ 1 acre and \leq 2 acres of impervious surface area.
- Include zero surface parking.
- Have at least 85% coverage for the entire project site by permanent structures. The remaining 15% portion of the site is to be used for safety access, parking structure entrances, trash and recycling service, utility access, pedestrian connections, public uses, landscaping, and stormwater treatment.

50% LID Reduction Credit

- Allow 50% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs $>$ ~~4~~2:1.
- Allow 50% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~100~~50 DU/acre.

75% LID Reduction Credit

- Allow 75% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs $>$ ~~5~~3:1.
- Allow 75% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~150~~75 DU/acre.

100% LID Reduction Credit

- Allow 100% non-LID treatment onsite for commercial or mixed use projects described by Category A2 with FARs > ~~64~~:1.
- Allow 100% non-LID treatment onsite for residential projects described by Category A2 with densities \geq ~~200~~100 DU/acre.

Category B (originally Category C) – Transit Oriented Development

Transit Oriented Development (TOD) shall meet the criteria for one Location Credit and shall have a density of at least 25 dwelling units per acre or a one-Density or Floor Area Ratio of at least 2:1-Development Credit to be eligible for any LID reduction credits. Auto-oriented land uses² will not be granted LID reduction credits. For qualifying projects, LID reduction credits would be assigned as follows:

Location Credits:

TOD projects may receive up to 50% LID reduction credits based on location³:

- Located within a ¼ mile radius of an existing or planned transit hub 50%
- Located within a ½ mile radius of an existing or planned transit hub⁴ 25%
- Located within a planned Priority Development Area (PDA)⁵ 25%

Density / FAR Credits:

TOD projects meeting the location criteria above may receive additional credits based on the following minimum density or FAR criteria, depending on the type of project.

- Commercial and Mixed-use Projects qualify for LID reduction credits based on the following minimum Floor Area Ratios (FARs) (only one reduction credit allowed):
 - FAR 2:1 10%
 - FAR 4:1 20%
 - FAR 6:1 30%

Commercial and Mixed-use TOD Projects do not qualify for LID reduction credits based on minimum densities.

- Residential TOD Projects qualify for LID reduction credits based on the following minimum densities (only one reduction credit allowed):
 - 30 DU/AC 10%
 - 60 DU/AC 20%
 - ~~120~~100 DU/AC 30%

² Auto-oriented uses include: stand-alone surface parking lots; car dealerships; auto and truck rental facilities with onsite surface storage; fast-food restaurants, banks and pharmacies with drive-through lanes; gas stations; car washes; auto repair and service facilities; and other industrial or auto-related uses unrelated to the concept of a transit-oriented development.

³ At least 50% or more of a project's site must be located within the ¼ or ½ mile radius of an existing or planned transit hub to be considered a TOD project; or 100% of a project's site must be within a PDA to be considered a TOD Project.

⁴ "Transit hub" is defined as a rail, light rail, or commuter rail station, ferry terminal, or bus transfer station served by 3 or more bus routes (a bus stop with no supporting services does not qualify). "Planned transit hub" is a station on MTC's Regional Transit Expansion Program list, per Resolution 3434 (revised April 2006), a regional priority funding plan for future transit stations in the Bay Area.

⁵ Planned Priority Development Areas (PDAs) are those infill development areas formally designated by the ABAG/MTC FOCUS regional planning program.

Residential TOD Projects do not qualify for LID reduction credits based on minimum FARs.

Minimized Surface Parking Credits:

TOD projects meeting the location and density/FAR criteria above may receive additional credits based on the maximum amount of surface parking.

- Maximum Surface Parking Area (only one reduction credit allowed):
 - No surface parking 20%
 - 10% or less of total post-project impervious surface area dedicated to at-grade surface parking (Note: surface parking areas are to be treated with LID treatment measures.) 10%

DRAFT

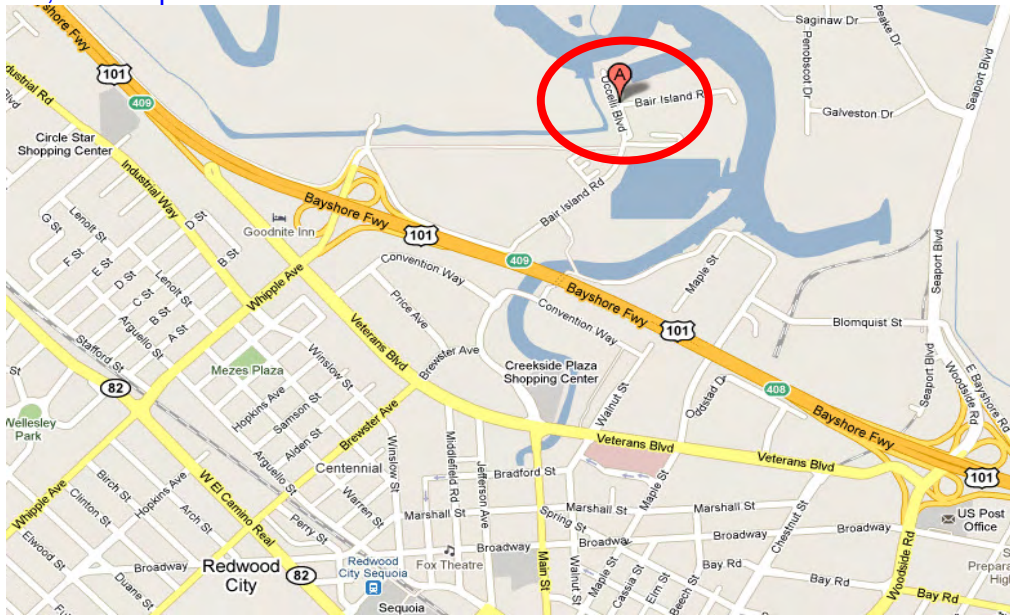


CALBIG MEETING ANNOUNCEMENT

- Stormwater Management and Inspections - (See Below)

This month's CALBIG meeting will be on Wednesday, August 10th from 11:30 to 1pm at The Waterfront Café located in Redwood City at Pete's Harbor. The location is at 1 Uccelli Blvd Redwood City. Phone # is 650-298-9896.

For directions, see map below.



Directions: Take US 101 to Whipple Ave Exit. Go east and follow the frontage road on the east side of Us101 to Bair Island Rd. Turn left and follow it to the end.

Fee: A charge of \$20 per attendee will be taken at the door. We accept cash or check. All checks are to be made out to CALBIG.

Choice of meals: orders will be taken at the restaurant.

Fresh filet of sole

Fresh sole sautéed with white wine, butter, garlic and lemon juice

Pasta rustica

Penne pasta-rigati with Italian sausages, onions and bell peppers

Shrimp Louie salad

Super cheeseburger

1/2 lb of choice ground beef, cheese and French fries



Inspecting Stormwater Best Management Practices (BMPs) at Construction Sites

The Waterfront Restaurant, Pete's Harbor
1 Uccelli Blvd, Redwood City

Wednesday, August 10, 2011

Agenda

Registration/Seating	11:30 – 11:45
Welcome	11:45
Michael Gorman, President, CalBIG	
Introduction	11:45 – 11:50
<ul style="list-style-type: none">▪ Follow-up on March 17 review of stormwater permit requirements▪ Today's focus: BMPs▪ Regional Water Board's recent enforcement actions▪ Opportunities for countywide information sharing and problem-solving	
Matt Fabry, <i>San Mateo Countywide Water Pollution Prevention Program</i>	
Construction Sites Stormwater BMP Expectations	11:50 – 12:50
<ul style="list-style-type: none">▪ <i>Keys to proper BMP implementation and installation</i><ul style="list-style-type: none">○ <i>Plan and manage the site</i>○ <i>Avoid rainfall contact with site inventory</i>○ <i>Prevent unauthorized non-stormwater runoff</i>○ <i>Keep trash and fugitive dust on site</i>○ <i>Provide erosion control</i>○ <i>Provide sediment control</i>	
Ed Boscacci, <i>BKF Engineers</i>	
Identify Needs for Further Training and Information	12:50 – 1:00
Matt Fabry, <i>San Mateo Countywide Water Pollution Prevention Program</i>	
Closing	1:00
Michael Gorman, President, CalBIG	

Please RSVP to Jeff Frishof at jfrishof@yahoo.com no later than Monday, August 7th. Because of the importance of this months meeting, we need an accurate head count.

Thank you !

**COMING ATTRACTIONS @ "THE WATERFRONT RESTAURANT"
PETE'S HARBOR, REDWOOD CITY, 11:30 AM - 1:00 PM
SAVE THESE DATES!!!**

Wednesday; September 14, 2011

Keynote speaker: David Goodin, Hardy Frames, Inc.

Topic: Moment Frames that Utilize the (N) Generation Side Plate Moment Connection Technology

Wednesday; October 12, 2011

Keynote speaker: Dee Dee Graham, Louisiana-Pacific Corporation

Topic: "Flame Block" OSB and "Tech Shield" Radiant Barrier

Wednesday; November 9, 2011

Keynote speaker: Branch Mgr. San Francisco Region, Powers Fasteners

Topic: Anchors vs the California Building Codes for "Alternative Materials" i.e. acceptance criteria for post-installed adhesive anchors in concrete elements (ACI 308)

Wednesday; December 14, 2011

Keynote speaker: Mandy Snow, S.R. Smith Company

Topic: Private and Public Pool Alarms, Barriers and Accessibility Requirements vs S.R. Smith Company's Product Line Solutions.

December we will take nominations for and online voting for our 2012 Officers and Board of Directors. Michael Gorman has termed out so consider doing your part in support of our chapter by running for one of three positions.

[[== Date ==]]

[[== Name of Project Developer or Owner ==]]
[[== Mailing Address ==]]

Reference: [[== Insert project name and address, and/or project number ==]]

Dear [[== Insert Name of Developer or Owner ==]]

This letter is an official notice regarding the above-referenced project, which has received a development permit from [[== Name of Jurisdiction ==]]. Please be advised that the project is subject to the [[== Name of Jurisdiction ==]]'s stormwater control requirements, as well as applicable State requirements.

Appropriate stormwater best management practices are required throughout the year, but are of particular concern during the wet season (which the Municipal Regional Stormwater Permit defines as October 1 through April 30). The purpose of this letter is to remind you to prepare the above-referenced construction site for the coming wet season.

Failure to implement effective best management practices that prevent construction site discharges of pollutants, and impacts on beneficial uses of receiving waters, is a violation of the [[== Name of Jurisdiction ==]]'s stormwater ordinance and subject to enforcement action. Violations may also result in enforcement action by the Regional Water Quality Control Board.

Information regarding stormwater best management practices is available on the San Mateo Countywide Water Pollution Prevention Program's website, www.flowstobay.org (click on "Business," then "Construction"). For more information regarding this correspondence, please contact [[== Insert name and contact information for local contact ==]].

Sincerely,

[[== Name and Title ==]]



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality Storm Water Section
1001 I Street • Sacramento, California 95814 • (866) 563-3107
Mailing Address: P.O. Box 1977 • Sacramento, California • 95812-1977
Fax (916) 341-5543 • <http://www.waterboards.ca.gov>



Edmund G. Brown, Jr.
Governor

CONSTRUCTION GENERAL PERMIT RISK LEVEL DETERMINATION NOTICE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH CONSTRUCTION AND LAND DISTURBANCE ACTIVITIES

You are receiving this notice because your construction site is enrolled under the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity, State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ (CGP).

Pursuant to CGP Section II(B)(4)(b), complete Notice of Intent (NOI) packages postmarked prior to the CGP's July 1, 2010 effective date received a temporary exemption from the risk determination requirements in Section VII and are subject to the Risk Level 1 requirements until September 2, 2011, two years after permit adoption.

If you expect the "grandfathered" WDID number to be active on or after September 2, 2011, you must conduct a Risk Level Determination pursuant to CGP Section VIII. The Risk Level Determination and amended SWPPP (certified by a Qualified SWPPP Developer), if applicable, must be submitted electronically through the Change of Information (COI) form in SMARTS by **September 2, 2011**. Failure to submit the Risk Level Determination by September 2, 2011 may result in civil liability under Water Code section 13385.

The Revised Risk Level applies to areas of the site that have not yet achieved final stabilization pursuant to CGP Section II(D)(1)(a) or that have not yet been disturbed.

How: Access and log into SMARTS at: <https://smarts.waterboards.ca.gov>

On the Main Menu Screen choose "Approved/Terminated NOIs" to view a specific WDID and start a new Change of Information request through the "COI" tab.

Note: The construction start date entered to determine the R-Factor in the RUSLE (Sediment Risk) analysis should be no later than the permit effective date of July 1, 2010.

Please contact the Storm Water Help Desk if you have any questions. 1-866-563-3107 or stormwater@waterboards.ca.gov