Compliance Reviews for C.3 Regulated Projects

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Water Pollution Prevention Program

Presentation Outline

- Important Resources
- Overview of Compliance Review Process and Stages
 - Planning Permit Compliance Review
 - Building Permit Compliance Review
 - Occupancy Certificate Compliance Review
- Use of the C.3 and C.6 Development Review Checklist
- Stormwater Management Plan (SMP) Elements
- Operation and Maintenance (O&M) Plan Tips



Important Resources

- New! SMCWPPP Website <u>www.flowstobay.org</u> (2020)
- New! SMCWPPP C.3 Regulated Projects Guide (2020)
- C.3 and C.6 Development Review Checklist (2019)
- Small Projects Checklist (2019)
- Both Checklists are:
 - To be completed by the project applicant
 - Available in several formats: PDF-Fillable Form, Excel and Word



SMCWPPP C.3 Regulated Projects Guide

Main updates

- Match the look and feel of the GI
 Design Guide
- New cross-references to the GI Design Guide
- Updated SCM guidance and new organization of content in each section
- New tree guidance
- New Alternative Compliance section
- Updated glossary





C.3 Regulated Projects Guide

For use by developers, builders and project applicants to design and build low impact development projects

Version 1.0 | January 2020



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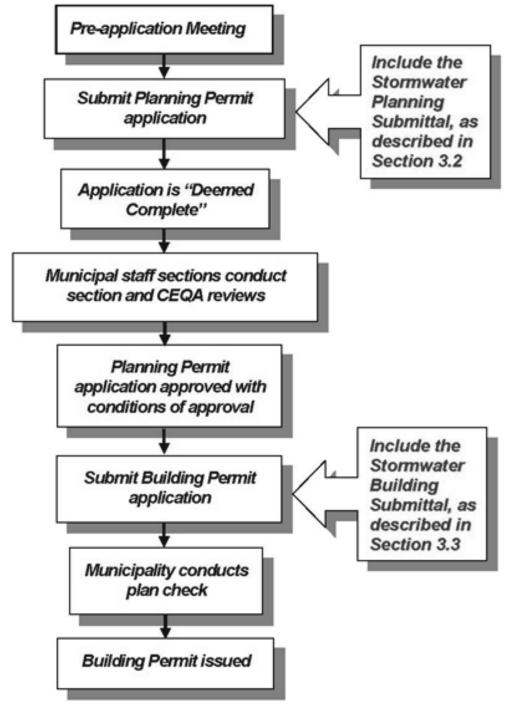
Development Review Process Overview:

(Figure 3-1 from Ch.3 of the C3RPG)

- 1. Planning Permit Stage (14 steps)
- 2. Building Permit Stage (3 steps)
- 3. Occupancy Permit Stage (O&M)

Small Projects may have a different process.





Planning Permit Stage Compliance Review Process





How Detailed Does a Stormwater Management Plan (SMP) Need to be at the Planning Stage?

- 1. A summary narrative of the project can be part of the SMP
- 2. A completed C.3 and C.6 Checklist
- 3. The whole site has been addressed with SCMs or through selftreating or self-retaining areas.
- 4. DMAs and SCMs are sized correctly and summarized in a table
- 5. Appropriately chosen SCMs (e.g. pervious pavement infiltrates)
- 6. Enough space is provided for SCMs
- 7. An appropriate LID/GI plant palette is provided



Planning Permit Stage Steps 1-7:

(from Chapter 3 of the C3RPG)

- **1. Collect needed site/project information**
- 2. Minimize site disturbances/protect sensitive areas
- 3. Incorporate site design measures
- 4. Measure pervious/impervious areas for C.3 analysis
- 5. Special project determination
- 6. Will rainwater harvesting be utilized?
- 7. Select SCMs & hydromodification management measures



Planning Permit Stage Steps 8-14:

- 8. Locate SCM/HM measures on the site
- 9. Preliminary design of SCM/HM measures
- **10. Consider planting palettes for SCM/HMMs**
- **11. Prepare preliminary O&M Plan (if required)**
- 12. Use applicable source control measures
- 13. Coordinate with other project requirements
- 14. Submit planning permit application



Stormwater Management Plan (SMP) Components

- For minimum MRP compliance and data for the Annual Report (approved projects), the plan must include:
 - C.3 and C.6 Development Review Checklist
 - Special Project LID Feasibility Narrative
 (C.3 Regulated Projects Guide Attachment J2), if applicable
 - To understand if the SMP is realistic, SCM plan sheets are needed with:
 - Location of site design measures
 - Location of DMAs
 - Location of SCMs
 - Runoff flow lines and entry points

- Table with each DMA, SCM and sizing calculation showing compliance Water Pollution Prevention Program

C.3 and C.6 Development Review Checklist

- Critical part of the SMP Submittal
- Used to fill out the Annual Report which is submitted to the Water Board
- Applicants <u>must</u> complete all fields on the Checklist



C.3 and C.6 Development Review Checklist funicipal Regional Stormwater Permit (MRP) formwater Controls for Development Projects			CITY/COUNTY OF Dept. Address Phone website						
	Project Informati	on							
A		3 Regulated Projects, "data will be reported in the municipality's stormwater Annual Report.)							
	Project Name:		Case M	Number:					
	Project Address & Cross St	41	10 mm						
	Project APN:	Pr	oject Watershed:						
	Applicant Name:			LA.4 Slope on Site:					
	Applicant Phone:	Ar	plicant Email Address:	and only on the second					
			picant Enter Poor ere.						
	Development type:	Single Family Residential: A stand	alone home that is not part of a lan	ger project.					
	(check all that apply)	Single Family Residential: Two or							
		Multi-Family Residential		# of units:					
		Commercial							
		Industrial, Manufacturing							
		Mixed-Use		# of units:					
		Streets, Roads ² , etc.							
			Redevelopment' as defined by MRP: creating, adding and/or replacing exterior existing impervious surface on a site where past development has occurred.						
I.	LA.1	Special land use categories' as outlets, (3) restaurants, (4) uncove	defined by MRP: (1) auto service fa red parking area (stand-alone or pa	acilities ³ , (2) retail gasoline art of a larger project)					
		Institutions: schools, libraries, jails,	, etc.						
		Parks and trails, camp grounds, of	ther recreational						
		Agricultural, wineries							
		Kennels, Ranches							
		Other, Please specify							
	Project Description4:								
	(Also note any past or future phases of the project.)								
	A2 Total Area of Site:	acres							
		rbed during construction (include clearing	g. grading, excavating and stockpile	area):acres.					
L I a	I.A.5 Certification: I certify that the information pr and/or replaced impervious so	rovided on this form is correct and ackno urface provided in this form, the as-built	wiedge that, should the project exce	eed the amount of new I improvements.					
N	Name of person completing th	he form:	Tite:						
	Signature:								
F	Phone number:	Email as	ddress:						
w z b	within 1 year of each other) are n		RP.						

- I.B Is the project a "C.3 Regulated Project" per MRP Provision C.3.b?
 - I.B.1 Enter the amount of impervious surface⁵ Retained, Replaced and/or Created by the project:

Table I.B.1 Impervious⁵ and Pervious Surfaces

	I.B.1.a	I.B.1.b	I.B.1.c	I.B.1.d	I.B.1.e
Type of Impervious ⁵ Surface	Pre-Project Impervious ⁵ Surface (sq.ft.)	Existing Impervious ⁵ Surface to be Retained ⁶ (sq.ft.)	Existing Impervious ⁵ Surface to be Replaced ⁶ (sq.ft.)	New Impervious ⁵ Surface to be Created ⁶ (sq.ft.)	Post-Project Impervious ⁵ Surface (sq.ft.) (=b+c+d)
Roof area(s)					0
Impervious ⁵ sidewalks, patios, paths, driveways, streets					0
Impervious ⁵ uncovered parking ⁷					0
Totals of Impervious Surfaces:	0	0	0	0	0
I.B.1.f - Total Impervious ⁵ Surface Replaced and Create	ed (sum of totals	s for columns I.B	.1.c and I.B.1.d)	: 0 so	ı. ft.
Type of Pervious Surface	Pre-Project Pervious Surface (sq.ft.)				Post-project Pervious Surface (sq.ft.)
Landscaping					
Pervious Paving				I.B.1.e.1:	
	1944 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 - 1946 -				
Green Roof					
Green Roof Totals of Pervious Surfaces:	0				0

C.3 and C.6 Checklist: Common Errors

Reporting "replaced" as "new" impervious area

	Pre-Project IS (ft ²)	Existing IS Retained (ft ²)	Existing IS Replaced (ft ²)	New IS Created (ft ²)	Post-Project IS Total (ft ²)	
Type of Impervious Surface (IS)						
Roof	76,600	0	0	90,000	90,000	
Sidewalks, etc.	102,800	0	0	94,600	94,600	
Uncovered Parking	45,200	0	0	40,000	40,000	
Total IS	224,600	0	0	224,600	224,600	
Total IS Replaced & Created			224,	600		



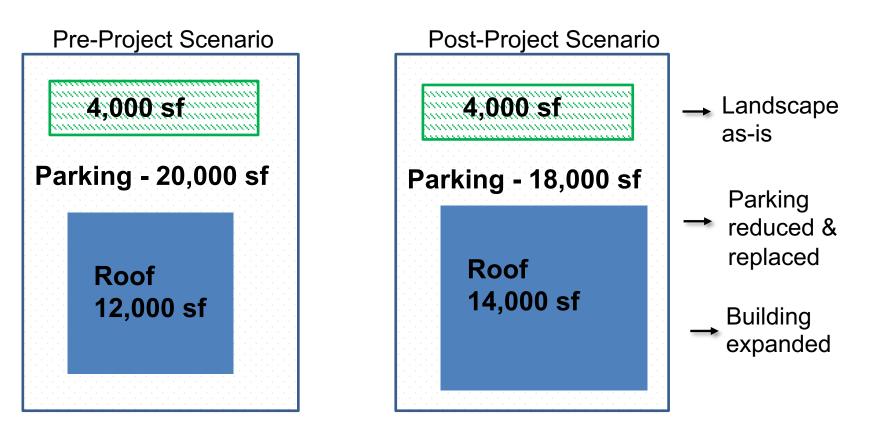
C.3 and C.6 Checklist: Common Errors

Reporting replaced and new impervious area

	Pre-Project IS (ft ²)	Existing IS Retained (ft ²)	Existing IS Replaced (ft ²)	New IS Created (ft ²)	Post-Project IS Total (ft ²)	
Type of Impervious Surface (IS)						
Roof	76,600	0	90,000	0	90,000	
Sidewalks & streets	102,800	0	94,600	0	94,600	
Parking	45,200	0	40,000	0	40,000	
Total IS	224,600	0	224,600	0	224,600	
Total IS Replaced & Created			224,	600		



Scenario 1 - Reporting Impervious Surfaces (IS)





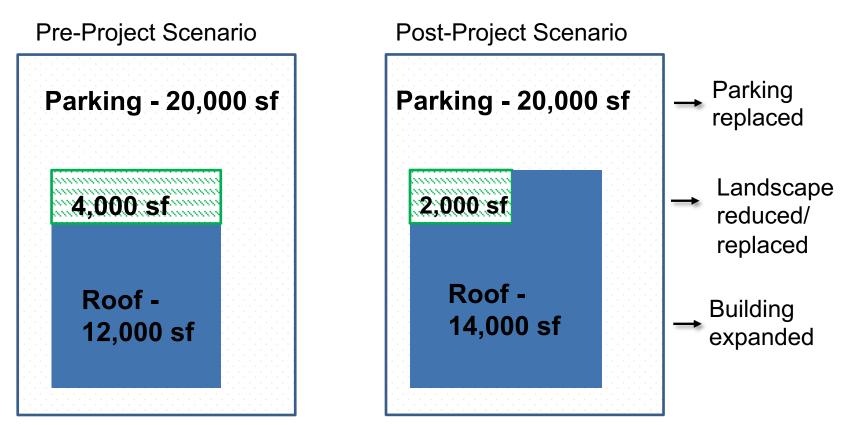
Pre-project IS - 32,000 sf Post-project IS - 32,000 sf Replaced IS - 32,000 sf New – 0 sf

Scenario 1 - Reporting Impervious Surface (IS)

	Pre-Project IS (ft ²)	Existing IS Retained (ft ²)	Existing IS Replaced (ft ²)	New IS Created (ft ²)	Post-Project IS Total (ft ²)		
Type of Impervious Surface (IS)							
Roof	12,00	0	14,000	0	14,000		
Parking	20,000	0	18,000	0	18,000		
Total IS	32,000	0	32,000	0	32,000		
Total IS Replaced & C		32,0	000				
Type of Pervious Surfac	ce (PS)						
Landscaping	4,000				4,000		
Pervious Pavement	0				0		
Green Roof	0				0		
Total PS	4,000				4,000		
Total Site Area:	36,000				36,000		
Percent Replacement= (Replaced Total IS/Existing Total IS)*100 = 32,000/32,000*100 = 100%							



Scenario 2 - Reporting Impervious Surface





Pre-project IS - 32,000 sf Post-project IS - 34,000 sf Replaced IS - 32,000 sf New IS - 2,000 sf

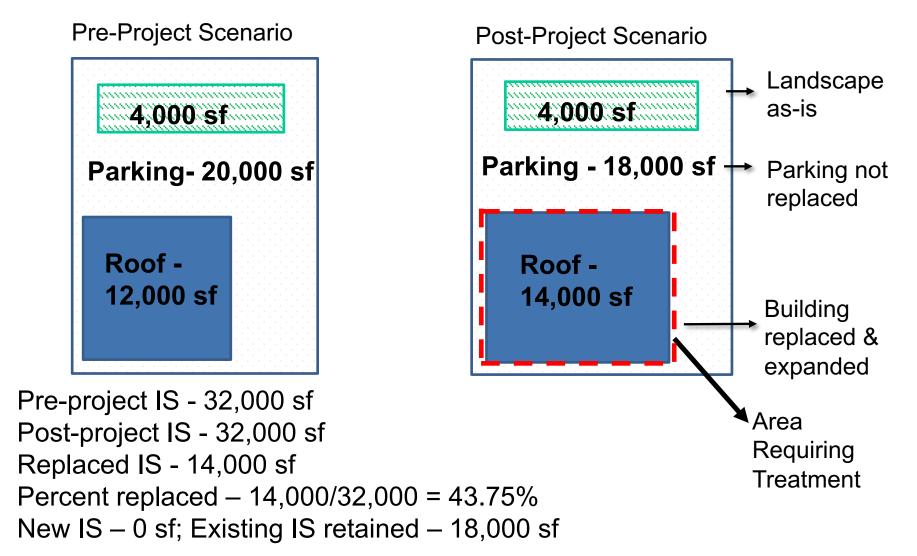
Scenario 2 - Reporting Impervious Surface (IS)

	Pre-Project IS (ft ²)	Existing IS Retained (ft ²)	Existing IS Replaced (ft ²)	New IS Created (ft ²)	Post-Project IS Total (ft ²)	
Type of Impervious Surface (IS)						
Roof	12,000	0	12,000	2,000	14,000	
Parking	20,000	0	20,000	0	20,000	
Total IS	32,000	0	32,000	2,000	34,000	
Total IS Replaced & C		34,0	000			
Type of Pervious Surfac	ce (PS)					
Landscaping	4,000				2,000	
Pervious Pavement	0				0	
Green Roof	0				0	
Total PS	4,000				2,000	
Total Site Area:	36,000				36,000	
Percent Replacement= (Replaced Total IS/Existing Total IS)*100 = 32,000/32,000*100 = 100%						



Prevention Program 32,000/32,000*100 = 100%

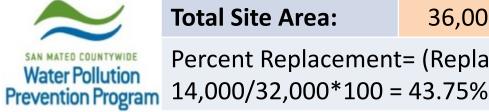
Scenario 3 - Reporting Impervious Surface





Scenario 3 - Reporting Impervious Surface (IS)

	Pre-Project IS (ft ²)	Existing IS Retained (ft ²)	Existing IS Replaced (ft ²)	New IS Created (ft ²)	Post-Project IS Total (ft ²)	
Type of Impervious Surface (IS)						
Roof	12,000	0	14,000	0	14,000	
Parking	20,000	18,000	0	0	18,000	
Total IS	32,000	18,000	14,000	0	32,000	
Total IS Replaced & C		14,0	000			
Type of Pervious Surfac	ce (PS)					
Landscaping	4,000				4,000	
Pervious Pavement	0				0	
Green Roof	0				0	
Total PS	4,000				4,000	
Total Site Area:	36,000				36,000	
Percent Replacement= (Replaced Total IS/Existing Total IS)*100 = 14.000/32.000*100 = 43.75%						



C.3 and C.6 Checklist: Common Errors

Checklist not updated as plan sheets are updated

1.d	I.B.1.e
	Post-Project
ervious ⁵	Impervious ⁵
e to be	Surface (sq.ft.)
⁶ (sq.ft.)	(=b+c+d)
	(191,320)

Calculations from Plan Sheet					
Drainage		Imperv	%		
Area ID	Area (SF)	Area (SF)	Imperv		
H1	191,340	156,412	82%		
H2	59,930	47,944	80%		
H3	5,960	0	0%		
Total	257,230	205,784	80%		



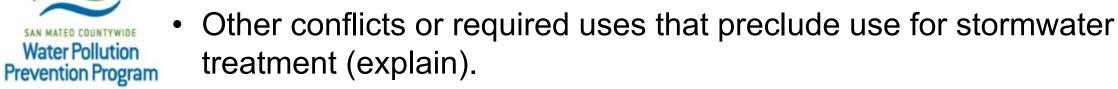
Special Projects Worksheet

- Provide supporting documentation for project characteristics identified
 - Gross density credit calculation
 - Dwelling Units per acre (DU/ac)
 - Floor Area Ratio (FAR)
 - Location credit include map showing distance to transit station "as the crow flies"
 - Parking credit show that surface parking is <10 % of total post-project impervious area



Special Projects Worksheet (cont.)

- Review LID Feasibility narrative (must include in the Annual Report to the Water Board)
- Examples of acceptable infeasibility criteria:
 - Steep slopes
 - Proximity to an unstable bank or slope
 - Inadequate space for bioretention areas that meet the C.3.d sizing
 - Environmental constraints (e.g., landscaped area in riparian corridor)
 - High groundwater or shallow bedrock;
 - Conflict with subsurface utilities;
 - Cap over polluted soil or groundwater;
 - Lack of head or routing path to move runoff;



Reviewing Site Design & Source Control Measures

- List of measures provided on C.3 and C.6 Checklist Worksheets B & C
- Measures that are applicable to the project
- Measures indicated on plan sheets or SMP narrative



Select appropriate site design measures and Identify the Plan Sheet where these elements are shown.



Worksheet B

Source Control Measures





+ D

Source Control Measures

Mark on-site inlets with the words "No Dumping! Flows to Bay" or equivalent.

(Refer to Local Source Control List for detailed requirements)

C3 - Source Controls

Yes Detail/Plan Sheet No.

Features that require

Storm Drain

source control measures

Select appropriate source controls and identify the detail/plan sheet where these elements are shown.

⁹ Businesses that may have outdoor process activities/equipment include machine shops, auto repair, industries with pretreatment facilities. 4/1/1/



⁸ Any connection to the sanitary sewer system is subject to sanitary district approval.

Worksheet C

Site Design Measures





Low Impact Development - Site Design Measures

Select Appropriate Site Design Measures (Required for C.3 Regulated Projects; all other projects are encouraged to implement site design measures, which may be required at municipality discretion.) Projects that create and/or replace 2,500 - 10,000 sg.t. of impervious surface, and stand-alone single family homes that create/replace 2,500 sq.ft. or more of impervious surface, must include one of Site Design Measures a through f (Provision C.3.i requirements).10 Larger projects must also include applicable Site Design Measures g through i. Consult with municipal staff about requirements for your project.

Select appropriate site design measures and Identify the Plan Sheet where these elements are shown.

Yes	Plan Sheet Number	
		 Direct roof runoff into cisterns or rain barrels and use rainwater for irrigation or other non-potable use.
		b. Direct roof runoff onto vegetated areas.
		c. Direct runoff from sidewalks, walkways, and/or patios onto vegetated areas.
		d. Direct runoff from driveways and/or uncovered parking lots onto vegetated areas
		e. Construct sidewalks, walkways, and/or patios with pervious or permeable surfaces. Use the specifications in the C3 Technical Guidance (Version 4.1) downloadable at <u>www.flowstobay.org/newdevelopment</u> .
		f. Construct bike lanes, driveways, and/or uncovered parking lots with pervious surfaces. Use the specifications in the C3 Technical Guidance (Version 4.1) downloadable at <u>www.flowstobay.org/new.development</u> .
		g. Limit disturbance of natural water bodies and drainage systems; minimize compaction of highly permeable solls; protect slopes and channels; and minimize impacts from stormwater and urban runoff on the biological integrity of natural drainage systems and water bodies.
		h. Conserve natural areas, including existing trees, other vegetation and soils.
		i. Minimize impervious surfaces.

Regulated Projects can also consider the following site design measures to reduce treatment system sizing:

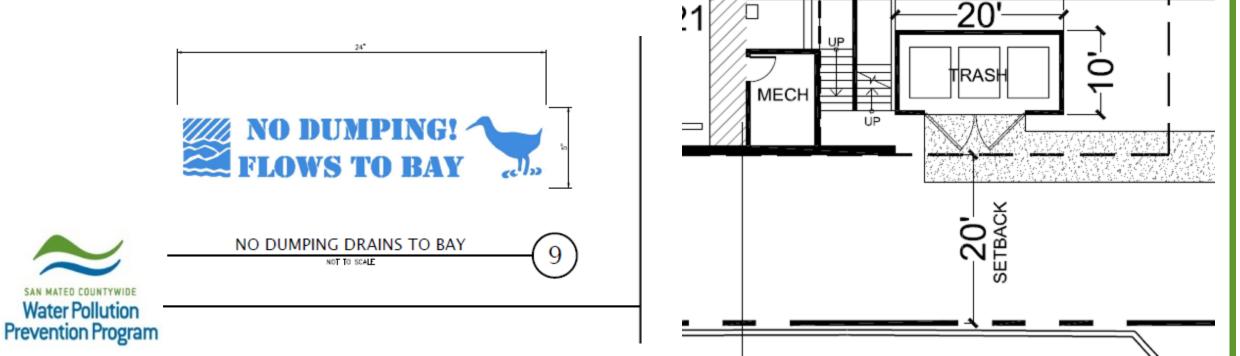
Yes	Plan Sheet Number	
		j. Self-treating area (see Section 4.2 of the C.3 Technical Guidance)
		k. Self-retaining area (see Section 4.3 of the C.3 Technical Guidance)
		L Plant or preserve interceptor trees (Section 4.1, C.3 Technical Guidance)

¹⁰ See MRP Provision C.3.a.i.(6) for non-C.3 Regulated Projects, C.3.c.i.(2)(a) for Regulated Projects, C.3.i for projects that create/replace 2,500 to 10,000 sq.ft. of impervious surface and stand-alone single family homes that create/replace 2,500 sq.ft. or more of impervious surface. 1/1/19 .6

Finding Source Controls on Plans

STORMWATER SOURCE CONTROLS

- 1. COVERED DUMPSTER AREA CONNECTED TO SANITARY SEWER.
- 2. BENEFICIAL LANDSCAPING, INCLUDING MINIMIZING IRRIGATION, RUNOFF, SYNTHETIC PESTICIDES, AND QUICK RELEASE FERTILIZER.
- 3. MAINTENANCE ACTIVITIES, INCLUDING PAVEMENT SWEEPING, CATCH BASIN CLEANING, AND GOOD HOUSEKEEPING.
- 4. STORM DRAIN LABELING.



SMP Components (Continued)

Level of SCM and SMP detail:

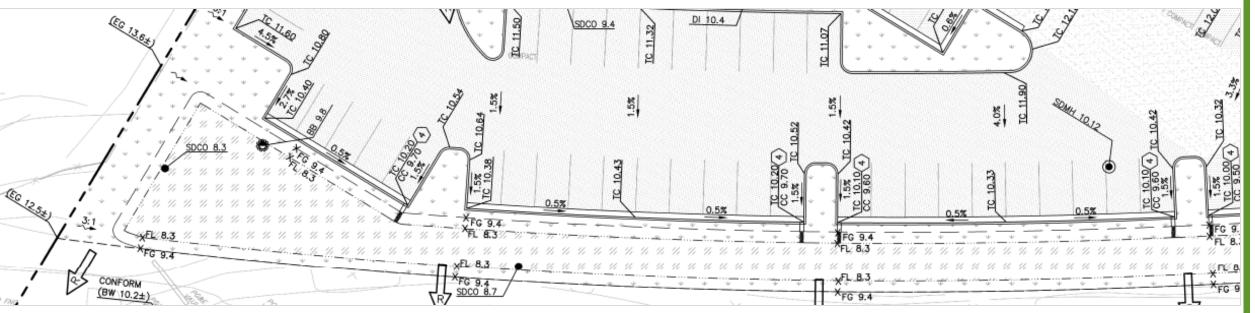
- Some jurisdictions allow for more comprehensive details to be submitted with the building permit phase as long as the SMP is clear
- Grading plan sheets
- Utility plan sheets
- Landscape plan (may be required for Planning Permit stage)





Reviewing Drainage Management Areas (DMAs)

- Stormwater management should not be an after-thought
- Review site topography/grading
 - Runoff should flow toward the treatment measures





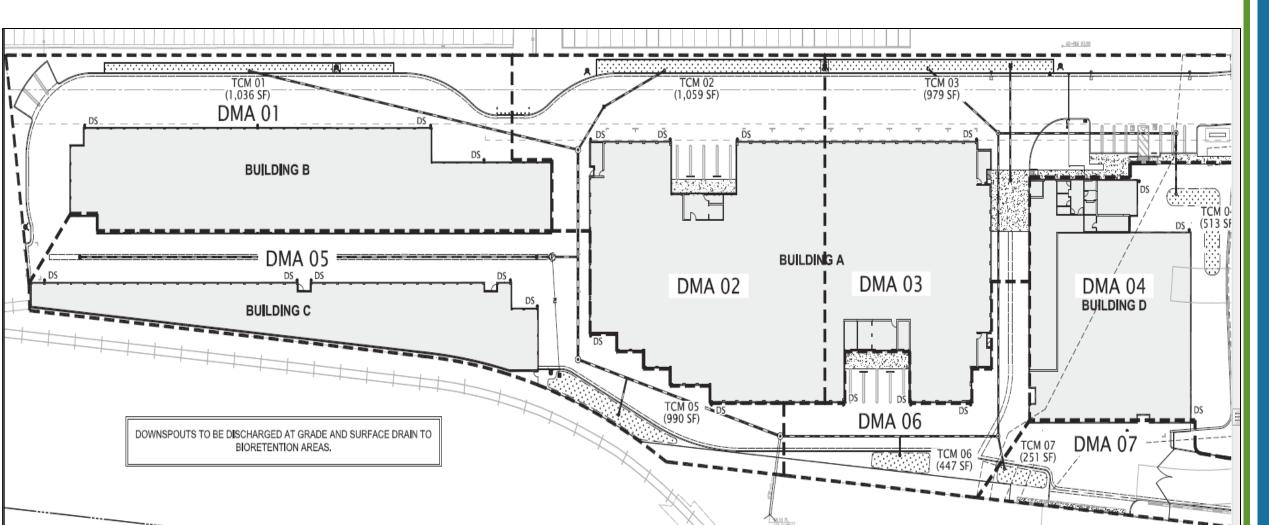
Designed for gravity flow

- Drainage into & out of the treatment measures should be by gravity flow
- Pumping runoff into treatment measures is strongly discouraged
 - Extra maintenance required
 - Frequent testing required
 - Failure of system may not be noticed
 - Flood/property damage risk
 - Failure during storm events
 - Mosquito problems from stagnant/residual water
 - Higher rate flows than gravity can cause erosion
 - Backup power generators

Prevention Program



- Divide the whole site into DMAs
- Indicate self-treating areas, self-retaining areas or SCMs for all DMAs



- All impervious areas within the DMA should drain to a SCM or a self-retaining area
 - Roofs, driveways, parking areas, walkways
- Indicate DMAs and SCMs on plan sheets
- DMAs on the plan sheet should match those on the DMA summary table





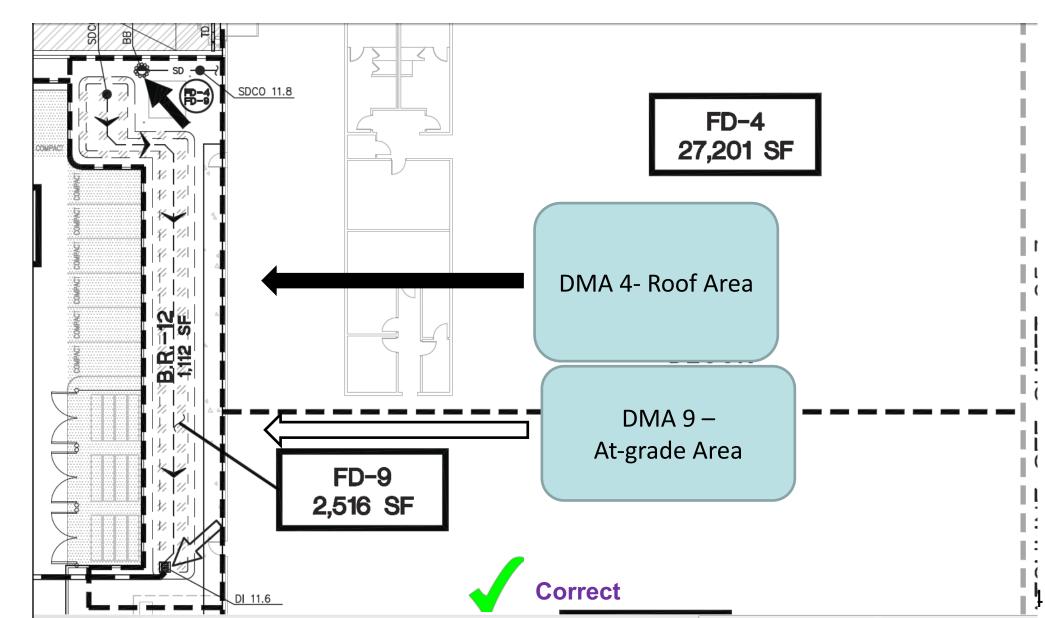
Multiple DMAs may flow to same SCM

- SCMs should be sized adequately
- Flow path should be indicated
- One DMA should not flow to multiple SCMs





Multiple DMAs Flowing to the Same SCM

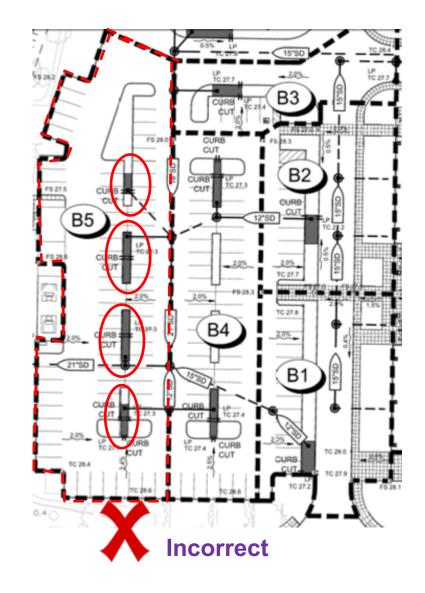


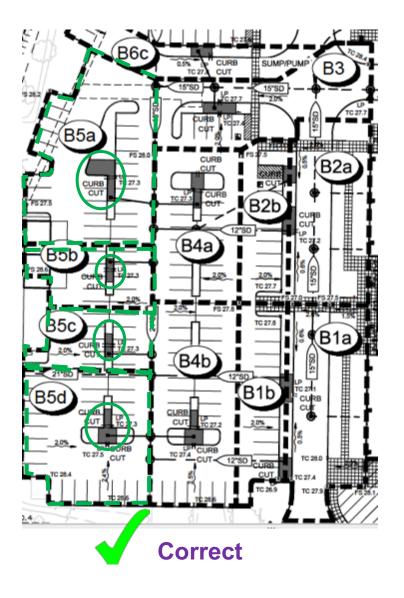
COUNTYWIDE

Water Pollution

Prevention Program

Each DMA Flowing Into One SCM



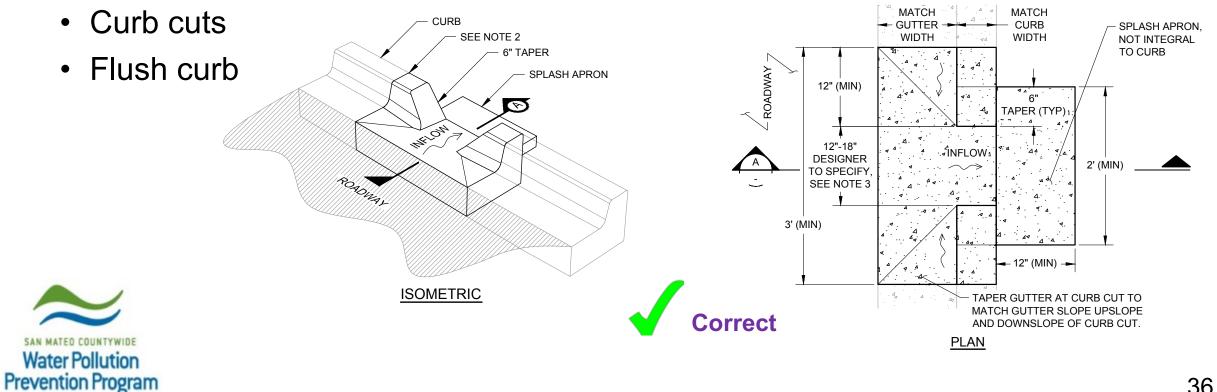


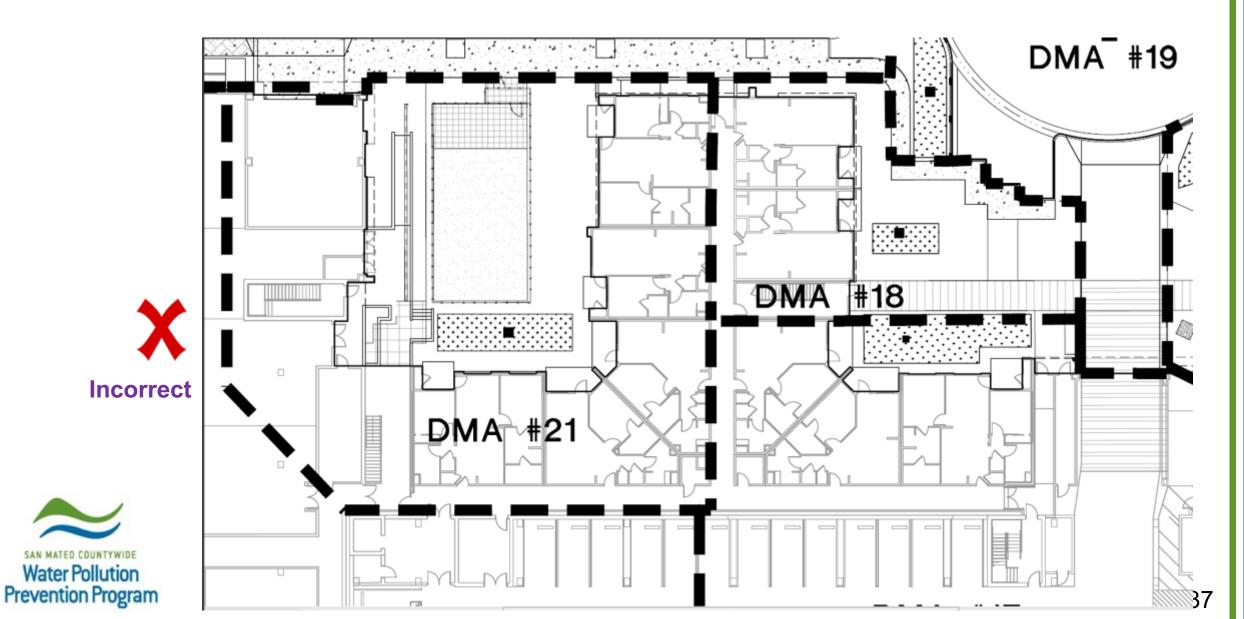


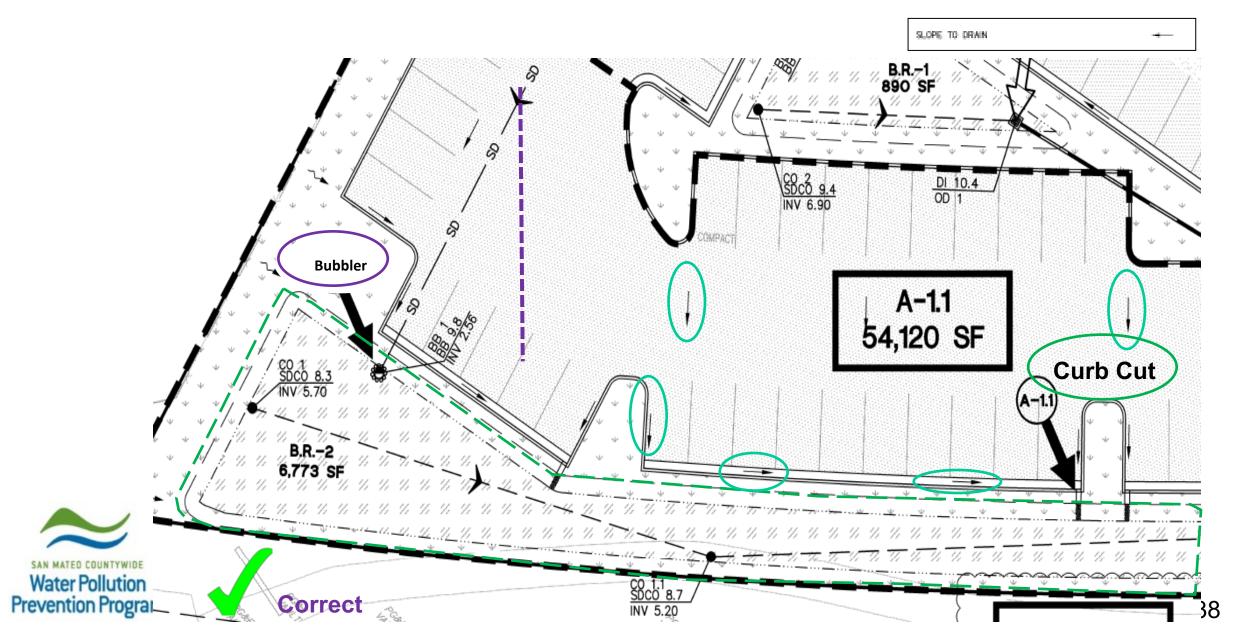
Flow Lines and Runoff Entry Points Indicated

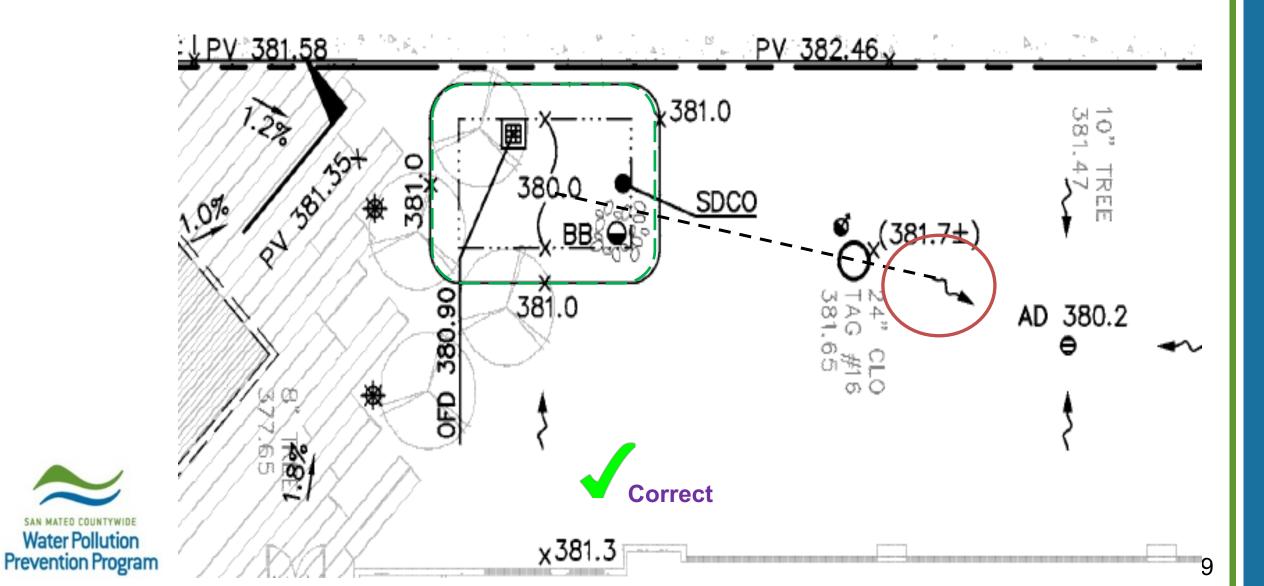
Direction of flow and how runoff enters treatment measures

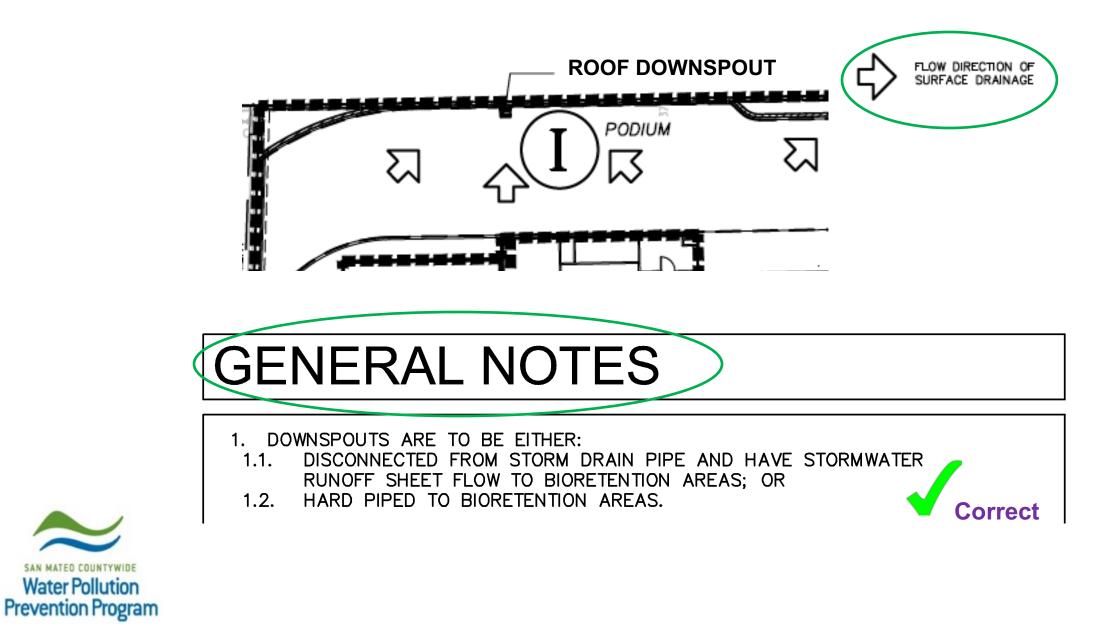
- Roof downspouts
- Area drain inlets
- Bubblers/pop-up emitters

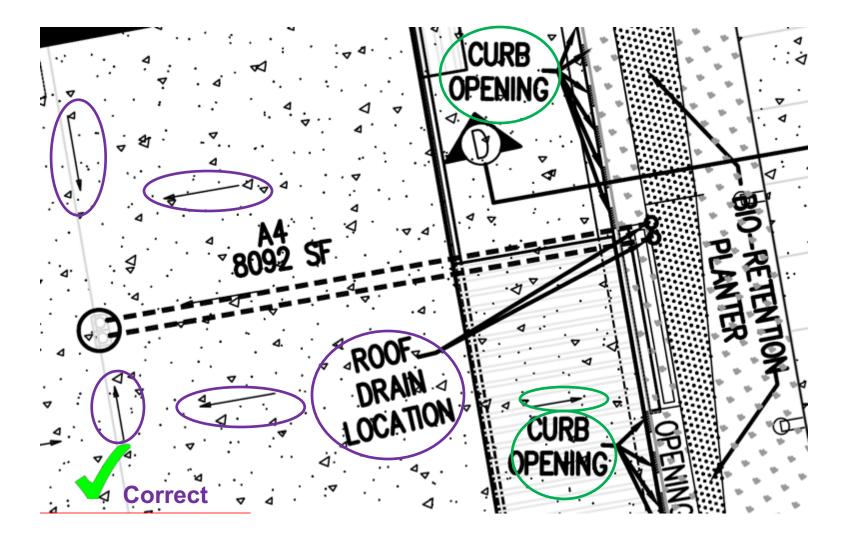














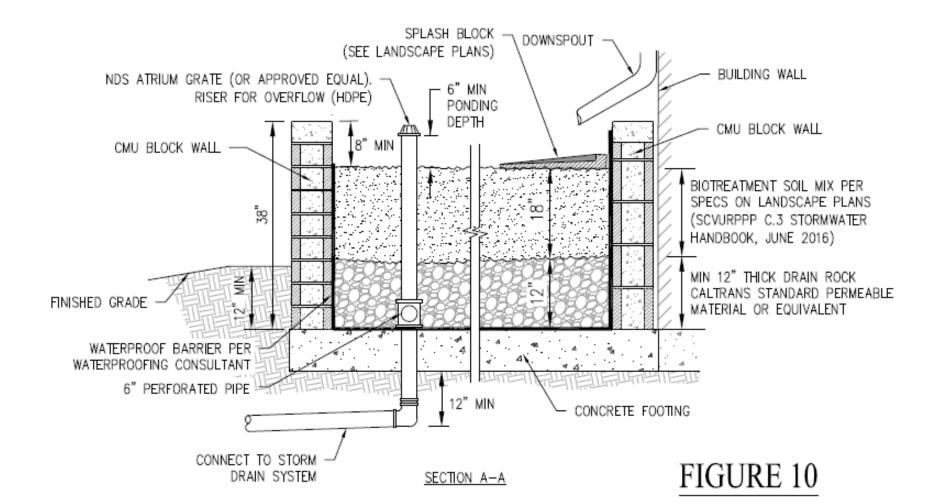
SCM Details

- Review typical details from the C.3 Regulated Projects Guide
- Require detail be customized to the project

COUNTYWIDE

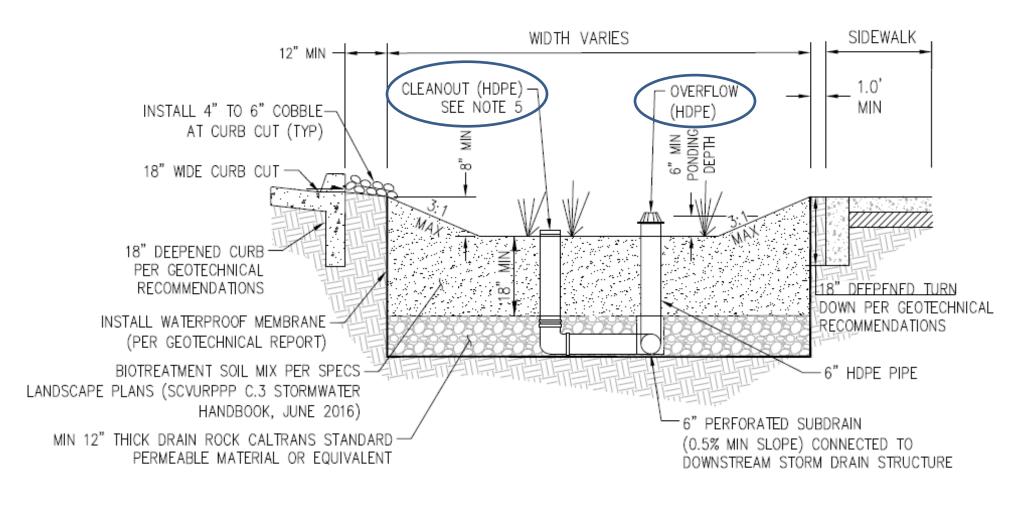
Water Pollution

Prevention Program



SCM Details

Require multiple views so inlets, outlet and cleanout are visible





BIORETENTION AREA IN LANDSCAPE AREAS

- Inlets for runoff not shown
- Overflow inlet not set above ponding depth
- Specific ponding depth not indicated
- Cleanout not shown

Prevention Program

- Underdrain placement not correct
- Energy dissipation not shown
- Filter fabric between biotreatment soil and drain rock (never allowed)

Bioretention Area/Flow-through Planter

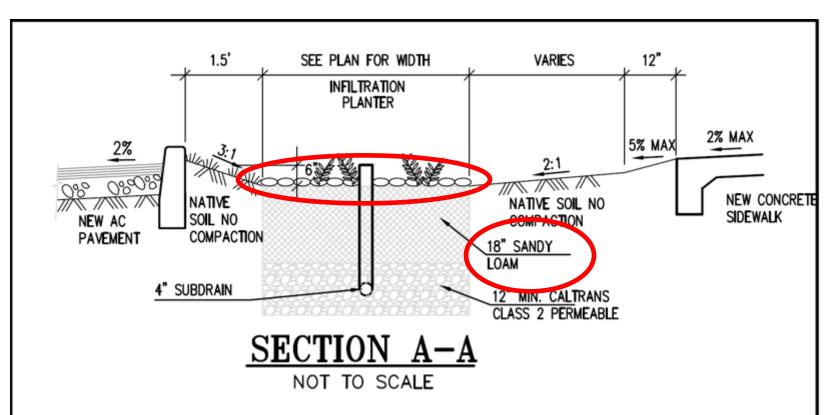
- Biotreatment soil mix not mentioned or wrong reference
- Mulch not mentioned need 3" of aged (composted) mulch or rock mulch

Bioretention Area

- Bottom lined without providing justification
 - Less than 5' separation from base to groundwater
 - Located within 10' of building
 - Infiltration not permitted on site



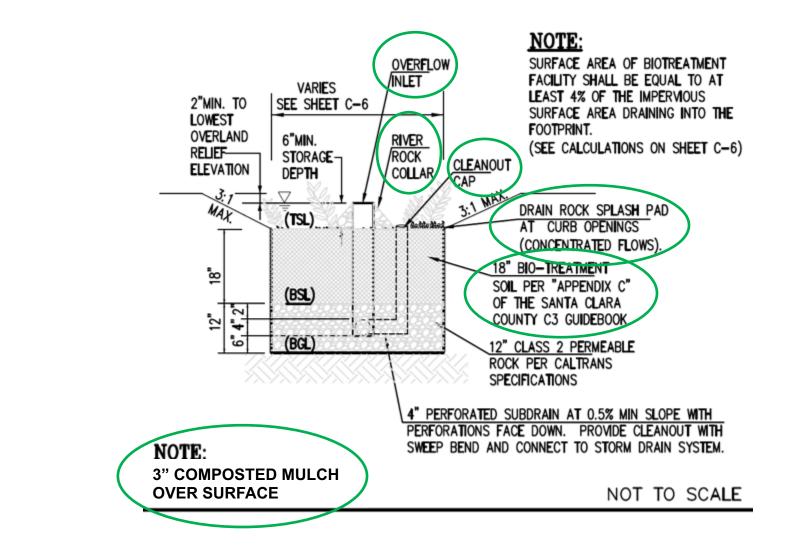






- Rock mulch or energy dissipation?
- No cleanout shown
- Incorrect soil specification

SCM Details: Good Notes





Biotreatment Soil Media

- BSM = 60-70% sand + 30-40% compost
- MRP 1.0 (revised Nov. 2011)
 - Specification included in Attachment L
- MRP 2.0 (adopted Nov. 2015)
 - No Attachment L
 - Allows permittees to develop and adopt revisions to soil specification (with Water Board approval)
 - Revised soil specifications posted on WB website
 - Included in Appendix K of C.3 Regulated Projects Guide



BASMAA BSM Spec. (adopted and revised 2016)

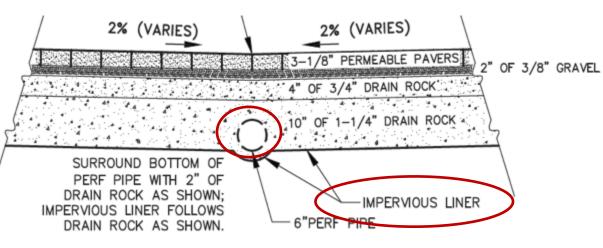
Infiltration Trench

• Lined with impervious liner

Pervious Pavement

- Not consistent with C3RPG guidance
- Lined with impervious liner and/or sand in the joints
- Designed to allow surface ponding
- Underdrain placement in aggregate layer not best practice anymore





SCM Sizing

- Indicate SCM & sizing method on C.3 and C.6 Checklist
- Starting July 1st collect and submit DMA and SCM data

	Infiltration Measures:Bioinfiltration13Infiltration trenchOther (specify):	Hydraulic sizing method ¹² 1.a 1.b 2.c 3 1.a 1.b
Biotreatment Measures:		Hydraulic sizing method ¹²
	Bioretention area	□2.c □3
	Flow-through planter	□2.c □3
	Other (specify):	



Indicate which of the following Provision C.3.d.i hydraulic sizing methods were used. Volume based approaches: 1(a) Urban Runoff Quality Management approach, or 1(b) 80% capture approach (recommended volume-based approach). Flow-based approaches: 2(a) 10% of 50-year peak flow approach, 2(b) 2 times the 85th percentile rainfall intensity approach, or 2(c) 0.2-Inch-per-hour intensity approach (recommended flow-based approach – also known as the 4% rule). Combination flow and volume-based approach: 3

SCM Sizing

Ensure sizing calculations are complete

TREATMENT CONTROL MEASURE SUMMARY TABLE									
Area	TCM#	Туре	Drainage Area (s.f)	Impervious Area (s.f.)	Pervious Area (s.f)	Bioretention Area Required (s.f)	Bioretention Area Provided (s.f)		
A	1	Planter Box	4,571	4,219	352	131 *	140		
В	2	Planter Box	4,947	4,625	322	143 *	150		
С	3	Planter Box	2,559	2,377	182	74 \star	75		
D	4	Planter Box	5,317	4,985	332	154 \star	155		
E	5	Planter Box	5,015	4,675	340	144 *	150		
F	6	Planter Box	2,540	2,357	183	73 \star	75		
G	7	Planter Box	5,141	4,953	188	149 \star	152		
Н	8	Planter Box	4,545	4,295	250	131 ★	131		



REQUIRED BIORETENTION SQUARE FOOTAGE OF BASE ON COMBINATION FLOW AND VOLUME CALCULATION ON SHEET TM6.1. *

Landscape Plans

- Choose plants consistent with the Plant List in Appendix A of the C.3 Regulated Projects Guide
- If choosing different plants, submit documentation from the landscape architect showing that the plants are appropriate
- Select plants that can tolerate the ponding depth provided

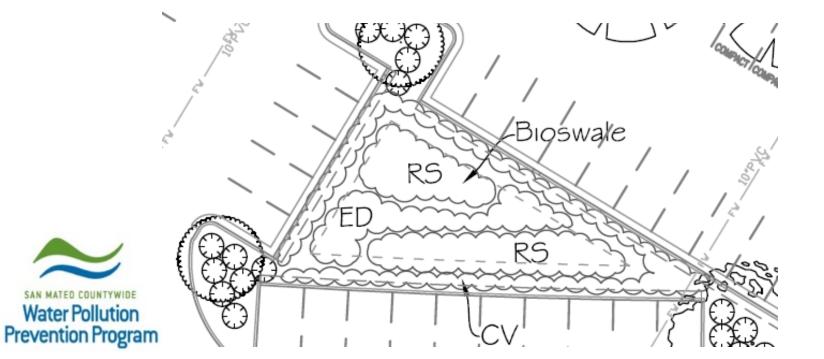


Landscape Plans

Clearly indicate the plants that will be planted in the treatment areas

Bioretention Plantings

ED	Epilobium densiflorum	Dense Spike P	rimrose Low 1	Gallon	36" OC
ID	Iris douglasiana	Douglas iris	lew-l	Gallon	24" OC / 48" OC
{MR	Muhlenbergia rigins	Muhfy Grass	Low	Gallon	48" OC }
{RS	Ribes sanguinium	Red Flowering	CurrentLow	Gallon	48" OC 🥻
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OR add a note on the plan that plants selected will be consistent with the SMCWPPP C3RPG Appendix A

Building Permit Stage Compliance Review Process



Building Plans

- Consistent with the Planning permit SMP?
- If conditions have changed, have C.3 and C.6 Checklist revised.
- If choosing different plants, submit documentation from the landscape architect showing that the plants are appropriate.
- Check to make sure that other sections of the building plans are consistent with the stormwater-related plans. Mechanical, Electrical and Plumbing (MEP) plans can sometimes interfere or conflict with stormwater plans.

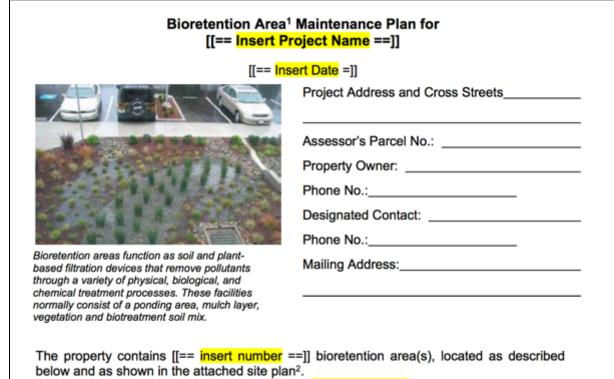


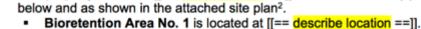
Occupancy Certificate Stage Compliance Review Process



Operation and Maintenance Plan

- Submit an O&M plan with the SMP or at a later stage before the **Temporary or Final Certificate of Occupancy is granted**
- Templates available in Appendix G of the C3RPG





[[== Add descriptions of other bioretention areas, if applicable, ==]]

Occupancy Certificate

- Is the final project construction and the O&M Agreement consistent with the Planning and Building permit SMP?
- If conditions have changed have the C.3 and C.6 Checklist revised
- Ensure that SCM and DMA information is accurate for Annual Report and is summarized in a table or in the C.3 & C.6 Checklist
- Last opportunity to have project team submit special project narrative and as-builts for O&M agreement
- Consider issues and communication for hand-off to new owners and/or HOAs etc.





Questions?

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