

# MRP 3.0 Tracking and Reporting Work Group

Meeting Summary

Wednesday, February 19, 2020

10:00 am – 12:00 pm

EOA, Inc., 1410 Jackson Street, Oakland, CA

## I. Introductions and Agenda Review

Attendees introduced themselves and the work group reviewed the agenda. No modifications were made to the agenda. Chris Sommers (Work Group Coordinator) informed attendees that the purpose of this Work Group is to discuss reporting requirements for Provisions C.2, C.6, C.7., C.9. and C.15. These provisions are not being discussed at specific MRP 3.0 Work Groups. The Work Group will also discuss cost reporting. Water Board (WB) staff have put together a table summarizing reporting requirements. This table will be used to guide today's discussions.

## II. Priority Topics for Discussion

- **General Annual Report Format**

Elyse Heilshorn (WB) informed attendees that WB staff are considering developing an online platform for annual reporting. Permittees will have a login/password for adding and updating information.

- **Provision C.2 Municipal Operations**

Elyse said that WB staff are finding it difficult to understand implementation of Best Management Practices (BMP) based on the limited yes/no responses in the Annual Reports. They would like to see additional check boxes or narrative to understand implementation. The "comments" section could be changed to "brief description". WB staff would also like access to Permittees' Standard Operating Procedures (SOPs), Corporation Yard Stormwater Pollution Prevention Plans (SWPPPs), and BMPs. These will help them understand Permittee programs. Joseph Martinez (WB) added that WB staff can use these documents to inform Permittees of any non-compliance with SOPs observed during field inspections.

Jim Scanlin (ACCWP) noted that pre-MRP Annual Reports had long checklists which WB staff did not find useful. Jill Bicknell (SCVURPPP) said all programs developed Performance Standards for each provision in the past. In pre-MRP Annual Reports, permittees used to certify that they are complying with the Performance Standards. Attendees noted that Permittees could provide narratives and access to SOPs, SWPPPs and BMPs. These documents could be submitted once per Permit term, or a link to these documents could be provided annually. Many Permittees are using the CASQA Municipal BMP Handbook for guidance on C.2 SOPs.

Keith Lichten (WB) stated that they want to be sure that municipal staff are being trained on current SOPs. He asked if Permittees have internal inspection tracking databases that could be made available. Kathy Cotes (Fremont) said yes, but that tracking systems differ across jurisdictions.

**Next steps** - BASMAA will discuss the revised reporting requirements proposed by Water Board staff and bring back recommendations to this group.

- **Provision C.6 Construction Site Control**

WB staff recommended the following changes to the reporting template:

- Report total number of sites requiring inspections (i.e., active sites) and total number of sites inspected. This will help address the issue of double-reporting sites that fall under two categories.
- Report number of inspectors conducting stormwater inspections, identify their departments, and state whether they received training. WB staff would like Permittees to conduct stormwater inspections all year round, i.e., even during dry season. One way to do this is to train other inspectors (e.g., construction or building inspectors) on stormwater issues.

Permittees noted that they are okay with these changes. However, inspection responsibility varies for each jurisdiction, and not all departments will be able to conduct stormwater inspections. They asked WB staff to define “active” sites.

- **Provision C.7. Public Information and Outreach**

Elyse noted that WB staff would like to simplify reporting for Provision C.7. One approach is to limit annual reporting to a table that lists the provisions and provides a brief description of activities implemented each year. Detailed information can be provided periodically, e.g., in Year 2 and Year 4 of the permit. WB staff is also okay with moving Provision C.7.a to Provision C.2 and Provision C.3.

Jim asked if the reporting for Provision C.7.a. can also be simplified since most agencies conduct ongoing evaluations instead of a post-campaign public opinion survey. Keith said that WB staff would be okay with this. He suggested that the BASMAA PIP Subcommittee discuss this topic and bring a recommendation to this Work Group.

**Next steps** – The BASMAA PIP Subcommittee will discuss effectiveness evaluation and bring back recommendations to this group.

- **Provision C.9 Pesticide Toxicity Control**

Zachary Rokeach (WB) noted that based on previous discussion with Permittees, instead of asking for more pesticide tracking information, WB staff is considering auditing programs to understand IPM implementation. Permittees agreed with this approach and suggested that WB staff consider developing indicators for determining success of an IPM Program.

**Next steps** - WB staff will develop indicators for determining the success of an IPM Program.

- **Provision C.15 Exempted and Conditionally Exempted Discharges**

No changes are planned to this provision, except any recommendations from the Firefighting Foam Work Group.

- **Cost Reporting**

Keith reported that the State Auditor’s 2018 Report directs the WB to comply with federal regulations and require Permittees to report projected and actual costs of compliance. The State Board’s early guidance on this requirement was released in December 2019 and

incorporated into the Salinas permit. The STORMS project on cost reporting is ongoing and is expected to be completed by 2022. Keith stated that MRP 3.0 will need to have some requirements for reporting information on costs. Keith did not think that the Salinas permit language was the most useful.

Chris expressed concern that cost information will lead to inappropriate comparisons between Permittees. Also, cost information for the previous year may not be available by the Annual Report submission deadline. Another issue is that equipment and administrative costs are difficult to track and account for, which will lead to underreporting of costs. Mitch Avalon (CCCWP) asked if costs could be calculated on a regional basis using industry standard unit costs. Keith said that WB staff would be open to this or other approaches.

**Next steps** – BASMAA will discuss cost reporting and bring back recommendations to this group.

### **III. Next Steps and Schedule**

- BASMAA will discuss the action items identified in today's meeting and bring back recommendations to this Work Group.
- The next meeting of the MRP 3.0 Reporting and Tracking Work Group will be held in April 2020.

**Meeting Attendees (see attached)**

### MRP 3.0 Tracking and Reporting Group Roster & Meeting Attendance

Attendee	Agency	2/19/2020
Chris Sommers	EOA/BASMAA facilitator	X
Keith Lichten	SF Bay Water Board	X
Zach Rokeach	SF Bay Water Board	X
Joseph Martinez	SF Bay Water Board	X
Derek Beauduy	SF Bay Water Board	X
Elyse Heilshorn	SF Bay Water Board	X
Vishakha Atre	EOA/SCVURPPP	X
Mitch Avalon	Contra Costa County	X
Jim Scanlin	Alameda County Clean Water Program	X
Melody Tovar	City of Sunnyvale	P
Jeff Sinclair	City of San Jose	P
Kathy Cote	City of Fremont	P
Matt Fabry	SMCWPPP	P
Jennifer Harrington	Vallejo Wastewater Agency	P
Kevin Cullen	FSSD	P
Jill Bicknell	EOA/SCVURPPP	P
Elisabeth Wilkinson	Valley Water	P
Kirsten Struve	Valley Water	P
<b>X - In-person attendee</b>		
<b>P - Attended by phone</b>		