



SECTION 1

INTRODUCTION

1. INTRODUCTION

BACKGROUND

Program Description

The Santa Clara Valley Urban Runoff Pollution Prevention Program (“Program”) is an association of thirteen cities and towns in Santa Clara Valley, the County of Santa Clara, and the Santa Clara Valley Water District (“Co-permittees”) that share a common permit to discharge stormwater to South San Francisco Bay. The Program incorporates regulatory, monitoring and outreach measures aimed at reducing pollution in urban runoff to the “maximum extent practicable” to improve the water quality of South San Francisco Bay and the streams of Santa Clara Valley. The Program is organized, coordinated, and implemented in accordance with a Memorandum of Agreement (MOA) signed by the Co-permittees in 1990 and 1999. The MOA covers the responsibilities of each Co-permittee and a cost-sharing formula for joint expenditures.

In June 1990, the San Francisco Bay Regional Water Quality Control Board (Regional Board or RWQCB) issued the Program its first NPDES permit.¹ The permit was reissued in 1995² and 2001.³ On October 17, 2001, the Regional Board amended the permit⁴ to include expanded requirements for controlling pollutants from new and redevelopment activities.

The Program’s Management Committee, consisting of one designated representative from each Co-permittee, is the official decision-making body for the Program. At the inception of the Program, the Santa Clara Valley Water District took the lead responsibility for management of the Program. In September 1997, the Management Committee retained EOA, Inc. to provide Program management services, and has subsequently renewed EOA’s contract through FY 05-06. The District is the Program’s fiscal agent and contracts with the Program Manager.

The Program’s Urban Runoff Management Plan

The Program and Co-permittees submitted a *Storm Water Management Plan* (SWMP) as part of the application for its 1995 NPDES permit renewal. The 1995 Permit required the Program to develop performance standards⁵ for various stormwater control measures and incorporate them in a revised management plan by September 1, 1997. The revised plan, called the *Urban Runoff Management Plan* (URMP) because of its focus on storm water pollution prevention efforts in urban areas, was completed and submitted to the Regional Board on September 1, 1997 and subsequently approved by Board staff (7/10/98 and 12/14/98 letters). In addition, the URMP is incorporated into the urban runoff permit. An updated URMP was submitted to the Regional Board as part of the permit renewal application.

¹ NPDES Permit No. CAS029718, Order No. 90-094.

² NPDES Permit No. CAS029718, Order No. 95-180 (as amended 7/21/99).

³ NPDES Permit No. CAS029718, Order No. 01-024 (2/21/01).

⁴ NPDES Permit No. CAS029718, Order No. 01-119, Amendment Revising Provision C.3. (10/17/01).

⁵ Performance standards are defined as “the level of implementation necessary to demonstrate control of pollutants in storm water to the maximum extent practicable.”

The URMP consists of an area-wide plan and individual Co-permittee plans describing what the fifteen Co-permittees will do, collectively and individually, to reduce urban runoff pollution. The URMP describes the goals and objectives of the Program and its various elements, including monitoring and watershed management measures.

The URMP also contains model performance standards that may be modified as appropriate to fit local conditions and are implemented by the Co-permittees. These include:

- Illicit Connection and Illegal Dumping (IC/ID) Elimination Activities
- Industrial/Commercial Discharger (IND) Control Program
- Public Streets, Roads, and Highways Operation and Maintenance
- Storm Drain System Operation and Maintenance
- Water Utility Operation and Maintenance
- Planning Procedures for New Development and Redevelopment
- Construction Inspection
- Pest Management
- Rural Public Works Maintenance and Support

In addition, the URMP presents a framework for the relationship between Program area-wide and Co-permittee specific Public Information/Participation (PI/P) activities which the Program and Co-permittees use to develop and conduct PI/P tasks.

The Program implements watershed management through its participation in the Santa Clara Basin Watershed Management Initiative (SCBWMI). The SCBWMI was established by the EPA, State Water Resources Control Board and Regional Board to manage water resources within the Santa Clara Basin watersheds. The SCBWMI is guided by stakeholders that include local, state and federal government agencies; business, agriculture and industry associations; and environmental and civic groups. The Program has been an active participant in the SCBWMI Core Group and its subgroups. The Program is working through the SCBWMI to: 1) identify and assess beneficial uses in the watershed within the urban area; and 2) identify and prioritize reasonable urban runoff control strategies.

Co-permittee Urban Runoff Management Plans

Each Co-permittee has developed an URMP tailored to its local characteristics. The Co-permittee URMPs contain strategies for local urban runoff controls, covering each of the Program elements (Industrial/Commercial Discharger Control, New Development and Construction, etc.) that are applicable to local conditions. The Co-permittee URMPs include:

- Performance standards (using the Program URMP's model performance standards as a template);
- Work Plans to implement performance standards;
- Description of the Co-permittee's legal authority;
- Best management practices (BMPs); and
- Standard operating procedures (SOPs) that detail how control measures will be carried out from day-to-day.

The Co-permittees also have responsibilities to conduct local PI/P programs, properly maintain corporation yards, conduct staff training and participate in Program and SCBWMI activities as appropriate.

The general relationship between the NPDES Permit, the Program's URMP and the Co-permittees' URMPs is shown on Figure 1-1.

Program Work Plan

By March 1 of each year, the Program submits to the Regional Board a draft Work Plan for implementation of the Program's URMP for the coming fiscal year, in accordance with NPDES Permit Provision C.6.b. The Work Plan includes clearly defined tasks, responsibilities and schedules to be implemented by the Program and Co-permittees. It also includes development of new, or modification of existing performance standards (Provision C.2.b), provides the Work Plan for implementing Provision C.3., describes planned monitoring activities (Provision C.7), describes pollutant-specific requirements (Provision C.9) and defines the Program's role relative to Watershed Management efforts (Provision C.10).

The Work Plan builds on the baseline efforts conducted by the Program and Co-permittees through a "continuous improvement" process, in which the Program seeks new opportunities to control storm water pollution. The continuous improvement process contained in the URMP is illustrated on Figure 1-2. The Work Plan includes a discussion of continuous improvement tasks that were identified, in part, during individual Co-permittee performance reviews, effectiveness evaluations in previous annual reports, and cooperative efforts between the Program and groups which include the Bay Area Stormwater Management Agencies Association (BASMAA), SCBWMI, Regional Monitoring Program (RMP) and Clean Estuary Partnership (CEP).

On February 28, 2003, the Program's *FY 03-04 Work Plan* was submitted to the Regional Board. Responses to Regional Board staff's comments on the *FY 03-04 Work Plan* dated June 24, 2003 were submitted to the Regional Board on August 5, 2003.

Program Annual Report

In accordance with NPDES Permit Provision C.6.a., the Program must submit an Annual Report by September 15 of each year. In addition, the Annual Report serves as an important internal Program tool in the cycle of planning, implementation, evaluation and continuous improvement. The Annual Report is the mechanism for documenting the status of planned activities, evaluating the effectiveness of those activities and identifying potential improvements. An additional evaluation mechanism is holding local program performance review meetings with each of the Co-permittees. During FY 02-03, the performance reviews focused on the effectiveness of existing New Development and Redevelopment Control Measures (to determine how individual Co-permittees are preparing to implement Provision C.3 requirements); and the implementation of the revised Construction Inspection Performance Standard. The performance review meetings serve as external evaluations, while the Annual Report is a self-evaluation by the Program. The results of the Annual Report and the performance reviews are used to assist the Program and Co-permittees in revising their Work Plans for the following year, as part of the Program's continuous improvement process.

On Monday, September 16, 2002, the Program's *FY 01-02 Annual Report* was submitted to the Regional Board. Responses to Regional Board staff's comments on the *FY 01-02 Annual Report* dated May 19, 2003 are provided with each specific program element discussed in this Annual Report. In previous Program Annual Reports, responses to Regional Board staff's comments were provided within a section entitled *Responses to Regional Board Comments*. In

March 2003, Regional Board staff suggested keeping all information relating to a program element together. As a result, this section has been eliminated.

The goals of the *FY 02-03 Annual Report* are to: 1) meet specific permit requirements for reporting; 2) provide an efficient mechanism for reporting and self-evaluation without duplicating information in the work plan or urban runoff management plans (URMPs); and 3) identify areas for continuous improvement.

ORGANIZATION OF REPORT

Following Section 1, the *FY 02-03 Annual Report* describes the implementation of *FY 02-03 Work Plan* activities in the following sections:

FY 02-03 Annual Report	FY 02-03 Work Plan
Section 2 – Program Management*	Program FY 02-03 Budget Performance Standard Revisions Program Continuous Improvement Tasks
Section 3 – Public Information/Participation (PI/P) Activities	FY 02-03 PI/P Work Plan
Section 4 – Monitoring	Multi-Year Year Receiving Waters Monitoring Plan FY 02-03 Annual Monitoring Plan
Section 5 – Watershed Management Measures	FY 02-03 Monitoring Plan (activities undertaken with/for the SCBWMI)
Section 6 – Pesticide Management	FY 02-03 Pesticide Management Work Plan
Section 7 – Mercury Pollution Prevention Activities	FY 02-03 Mercury Pollution Prevention Work Plan
Section 8 – New and Redevelopment Control Measures	FY 02-03 C.3. Work Plan

* Note that the “Work Plan” for many of the Program management activities is the scope of work in EOA’s contract for Program management services.

Each section contains relevant tables and/or appendices of supporting materials at the end of the section.

Section 9 contains the Co-permittees’ IND and IC/ID Summary Tables for FY 02-03. Each Co-permittee summary table provides information on the required categories as described in the technical memoranda dated September 7, 2001. Co-permittee summary tables are also included in each Co-permittee Annual Report and will contain similar information to what is found within Section 10 of the Program’s FY 01-02 Annual Report. In addition, each Co-permittee has been requested to include a breakdown of the levels of enforcement action taken for each IND inspection.

Section 10 contains the Co-permittees' FY 02-03 Annual Reports. Each Co-permittee report includes a cover letter summarizing local program highlights, accomplishments and continuous improvement items; and a certification statement. Co-permittees have prepared and submitted the following information (with appropriate attachments) in accordance with the Regional Board's document entitled *Suggested SCVURPPP Co-permittee Annual Report Format* (Draft) dated May 29, 2003:

- IC/ID Elimination Activities
- Industrial/Commercial Discharger Control Program
- Public Agency Activities
 - Public Streets, Roads and Highways O&M (including Corporation Yards)
 - Rural Public Works O&M
 - Storm Drain O&M
 - Water Utility O&M
 - Other Public Agency Activities (Golf Courses, Parks, Ponds, etc.)
- New Development Planning Procedures
- Construction Inspection
- Public Information and Participation
- Pesticide Management Activities
- Mercury Pollution Prevention Activities
- Copper Action Plan/Nickel Action Plan
- Trash Inventory and Management
- Water Quality Monitoring
- Staff Training Summary Table

Other elements that do not fall under the above categories (e.g., PCB Control Program (C.9.e.), Control Program for Sediment (C.9.f.) and Watershed Management (C.10.)) are provided by each respective Co-permittee conducting the activity.

Figure 1-1. Program Implementation

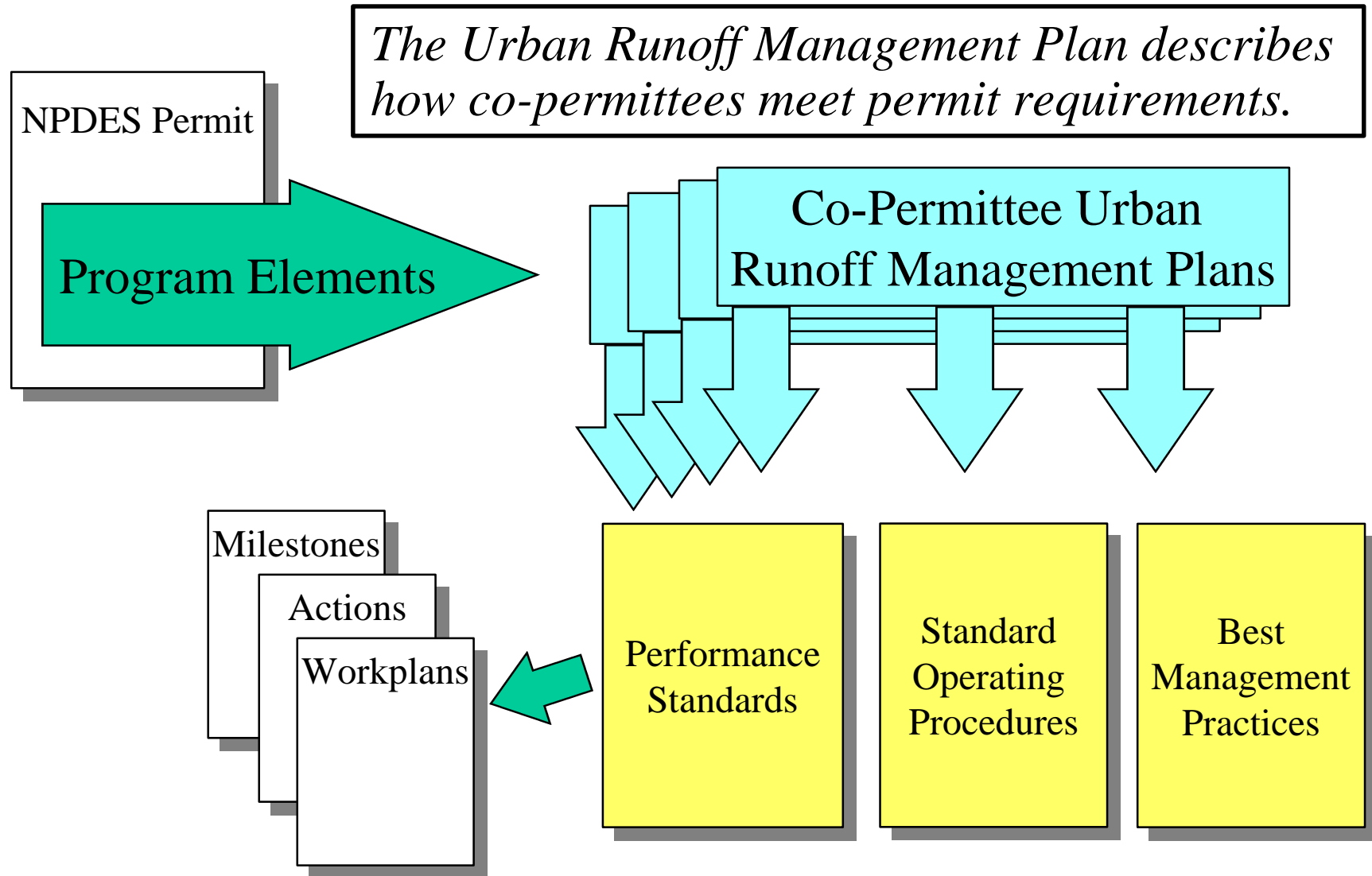


Figure 1-2
Continuous Improvement

