

**City of San José**  
**Urban Runoff Management Plan**

**Chapter 11:**  
**Santa Clara Valley Urban**  
**Runoff Pollution Prevention Program**

**Attachment 1: Work Plans, FY 04-05**

**Prepared by the Environmental Services Department**

**March 1, 2004**



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## Introduction

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This compilation of annual work plans for the City of San Jose Urban Runoff Management Plan (URMP) has been developed for FY 2004-2005 pursuant to Section C.6.b of the City's Municipal Separate Storm Sewer System NPDES permit (No. CAS029718), Order 01-024. The work plans include tasks, responsibilities, and schedules needed to implement the program elements in the URMP. The Environmental Services Department coordinates development and review of the work plans in cooperation with staff from all affected City departments.

The Permit requires that annual work plans be submitted to the Regional Board by March 1 of each year. This submission precedes completion of the City's annual budget development and approval process. While the work plans are developed using the best available information regarding budget forecasts, all activities in the work plans are subject to the approval of funding by the City Council in June of each year.

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## Illicit Connection / Illegal Dumping

### ICID Work Plan

This program element is implemented pursuant to permit provision C.2. The City's Environmental Inspectors continue to conduct ICID investigations.

#### ICID 1 - Response to Complaints

The City of San Jose will respond to complaints regarding IC/ID dumping activities into the storm drain system and will ensure that the activity has ceased or is an allowable discharge.

#	Activities	Compliance Date	Responsible Party
A.	Update database system to track IC/ID complaint information.	Done FY 02-03	ESD-WE
B.	Document to RWQCB annually the number of IC/ID complaints that City received, & that activity has ceased or is an allowable discharge.	Annually	ESD-WE
C.	Document to the RWQCB annually follow-up activities from each IC/ID complaint response. (Table 1 in the Annual Report)	Annually	ESD-WE
D.	Review effectiveness of standard operating procedures for responding to IC/ID complaints.	Ongoing	ESD-WE
E.	Work with SCVURPPP to refine administrative procedure for providing referrals to the Regional Board.	<del>6/03</del> 6/30/05	ESD-WE, Program
F.	Revise standard operating procedures to incorporate results of ICID 1E.	<del>6/03</del> 6/30/05	ESD-WE, Program

#### ICID 2 - Investigations

The City of San Jose will conduct investigations of high priority areas. High Priority is defined as areas with a high potential for non-storm water discharges to the City's collection system.

#	Activities	Compliance Date	Responsible Party
A.	Identify high priority areas, primary types & sources of IC/ID pollution based on complaints, historical inspection records, inspector knowledge and monitoring information.	Annually	ESD-WE
	1. Perform GIS analysis on frequently occurring IC/ID sources and/or types.	FY 03-04	ESD-UR
B.	Conduct investigations of high priority areas based on ICID 2A.	Ongoing	ESD-WE
C.	Document to the RWQCB that high priority areas have been conducted, per Table 2 in revised reporting format.	Annually	ESD-WE

**ICID 3 - Inspector Training**

The City of San José will ensure that IC/ID inspectors are adequately trained in inspection procedures, documentation, and enforcement related to storm water pollution prevention.

#	Activities	Compliance Date	Responsible Party
A.	Conduct annual training for IC/ID inspectors.	Annually, Q1	ESD-WE
B.	Provide and document on-the-job training and other training opportunities, such as inspection workshops.	Ongoing	ESD-WE
C.	Review inspection training protocols to identify new training opportunities, approaches, and materials.	Annually	ESD-WE

**ICID 4 - Outreach and Technology Transfer**

The City of San Jose will distribute outreach and technology transfer material containing applicable control measures and/or BMPs to target parties responsible for IC/ID activities.

#	Activities	Compliance Date	Responsible Party
A.	Develop and/or modify existing outreach material, as needed, based on report developed under ICID 4B	Ongoing, as needed	ESD-WE
B.	Determine need for new outreach and technology transfer material by getting feedback from inspectors regarding 1) continuing problem activities 2) discharge types and 3) monitoring and complaint data, 4) usefulness of existing outreach and technology transfer material.	Ongoing	ESD – MarComm ESD-UR
C.	Document to RWQCB that outreach technology transfer material and/or BMPs have been distributed; tracked in Urban Runoff database.	Annually	ESD-UR
D.	Develop and implement standard operating procedures to gather customer feedback on IC/ID services.	Development Done FY 02-03 Implementation Ongoing	ESD-WE

**ICID 5 - SOPs Effectiveness Evaluation**

The City of San Jose’s Watershed Enforcement staff will review and evaluate the effectiveness of its SOPs in responding to complaints regarding illicit connections and illegal discharge dumping activities into the storm drain system.

#	Activities	Compliance Date	Responsible Party
A.	Document and evaluate effectiveness of SOPs	Annually	ESD-WE
B.	Document and evaluate what worked well and what needs improvement.	Annually	ESD-WE

## Industrial & Commercial Dischargers

### IND Work Plan

Pursuant to permit provision C.2, the City continues to conduct Industrial and Commercial facility inspections based on the new inspection frequency schedule and collect the information needed to meet enhanced reporting requirements. Some activity descriptions have been revised to match practices adopted in 2002.

#### IND 1 - Notice of Intent (NOI) Filers

The City of San José will conduct inspections of those facilities that have filed an NOI with the State and appear on a list provided by the State.

#	Activities	Compliance Date	Responsible Party
A.	Annually, obtain NOI filer database from State with annual information, review information and identify new NOI facilities for inspection next year.	Annually	ESD-WE
B.	Conduct and document initial inspections of NOI Filers within one year using the inspector checklist form to determine <b>exposure and whether the facility constituted a significant or non-significant potential threat to discharge pollutants to the storm drain collection system</b> ; assign a future inspection frequency to each facility accordingly. Document whether the facility had submitted an NOI, and whether a SWPPP and a SWMP were on site.	Ongoing	ESD-WE
C.	Conduct & document annual inspections of facilities determined to <del>be Significant Facilities</del> <b>have exposure</b> in accordance with inspection frequency schedule.	Ongoing	ESD-WE
D.	<del>Collect information during inspections on the potential for storm water pollution at industrial and commercial facilities in order to determine the appropriate inspection frequency for the various facilities</del>	<del>Ongoing</del>	ESD-WE
E.	Conduct & document inspections of facilities that need to file an NOI at least once every five years for facilities determined <del>to be Non-Significant</del> <b>have exposure</b> in accordance with inspection frequency schedule. Enter inspection information from the inspector facility audit form onto the database.	Ongoing	ESD-WE
F.	<del>Collect information during inspections on the potential for storm water pollution at industrial and commercial facilities in order to determine the appropriate inspection frequency for the various facilities</del>	<del>Ongoing</del>	ESD-WE
G.	Update the database to track the inspection information from the inspector checklist and to include all NOI filer SIC codes required by the Industrial Activities Storm Water General Permit	Ongoing	ESD-WE

### IND 2 - Non-Filer Investigations

The City of San José will inspect industrial facilities that may be subject to general permit requirements but are not found on the NOI filer list provided by the State.

#	Activities	Compliance Date	Responsible Party
A.	Identify industrial facilities that conduct activities with the SIC codes listed in the IND SOPs.	Annually	ESD-WE
B.	Develop a list of facilities targeted for inspection during upcoming year that may be subject to general permit requirements for NOI based on business licenses, etc.	Annually	ESD-WE
C.	Conduct and document initial inspections of industrial facilities with the SIC codes listed referenced in IND 2A, using the inspector checklist form to document whether the facility constituted a significant or non-significant potential threat to discharge pollutants to the storm drain collection system, whether the facility had submitted an NOI, and whether a SWPPP and a SWMP were on site.	Ongoing	ESD-WE
D.	Conduct & document annual inspections of facilities determined to be Significant Facilities in accordance with implementation schedule. Add the facility to appropriate database(s) and assign an inspection frequency. If the facility inspected is determined to need to file an NOI and is not able to provide an NOI, SWPPP or SWMP, refer to the RWQCB.	Ongoing	ESD-WE
E.	Work with the Program’s Industrial Inspection Ad Hoc TG on an Administrative procedure for providing referrals to the Regional Board and document providing referrals to the Regional Board for facilities with significant problems.	<del>6/30/03</del> <b>Pending Implementation by Program</b>	ESD-WE, ESD-UR

### IND 3 - City Regulated Facilities

The City of San José will conduct inspections of City Regulated facilities as identified below:

Type	Frequency
Food service facilities	2 or more AOCs* over a rolling three year time period - Every year 1 AOC over a rolling three year time period – Every two (2) years 0 AOCs over a rolling three year time period - Every three (3)years
All Other City Regulated facilities	2 or more AOCs* over a rolling five year time period – Every year 1 AOC over a rolling five year time period – Every two (2) years 0 AOCs over a rolling five year time period but have exposure – Every five (5) years 0 AOCs over a rolling five year time period <u>with no exposure</u> or potential for exposure – No further inspections
Facilities for which a referral or ICID complaint is received	As soon as practicable for violations and every year until they meet the above criteria.

\*Area of Concern (AOC) = A violation based on the San Jose Municipal Code 15.14.530 issued to a facility during a storm water inspection.

#	Activities	Compliance Date	Responsible Party
A.	Determine industrial/commercial facilities identified in the IND SOPs for inspection in each FY.	Annually, Q1	ESD-WE
B.	Conduct and document inspections of City Regulated facilities, other than food service facilities, at least once every five (5) years in accordance with the inspection frequency schedule. If determined to have no impact or no potential for pollution, will not be scheduled for future inspection.	Ongoing	ESD-WE
C.	Conduct and document inspections of City Regulated food service facilities at least once every three (3) years. Initial approved performance standards require inspections every three years. If determined to have no impact or no potential for pollution, will not be scheduled for future inspection.	Ongoing	ESD-WE
D.	Conduct and document inspections for which a referral or complaint was received within one year. After the inspections, enter the information from the inspector facility inspection report onto the database.	Ongoing	ESD-WE
E.	Develop a database to track the inspection information from the inspector facility inspection report.  <b>1. Implement new Environmental Enforcement Data Management System</b>	Done FY 02-03  <b>FY 03-04</b>	ESD-WE  <b>ESD-WE</b>
F.	Revise database to track inspection information from inspector facility inspection report and to include new industrial program categories.	As Needed	ESD-WE
G.	For B, C, D, and E, collect information during inspections on the potential for storm water pollution at City Regulated facilities in order to determine the appropriate inspection frequency for the various facilities.	Ongoing	ESD-WE
H.	Develop an inspection frequency plan to track frequency of inspections. Implement & update, as needed, the inspection frequency plan.	Development: Done FY 01-02  Implementation <del>As Needed</del> <b>Ongoing</b>  <b>Updated as needed</b>	ESD-WE

#### IND 4 - Compliance

The City of San José will conduct industrial/commercial inspections to determine the existence of discharges or threatened discharges, which are illegal under local ordinances. The facility operator will be notified of observed areas of concern to be corrected and/or if official action on violations is necessary, it will take place under local enforcement procedures.

#	Activities	Compliance Date	Responsible Party
A.	Document facilities that have enforcement actions, and the type of enforcement actions, conducted <i>for</i> the existence of discharges or	Ongoing	ESD-WE

#	Activities	Compliance Date	Responsible Party
	threatened discharges that are illegal under local ordinances.		

**IND 5 - Training**

The City of San José will ensure that industrial/commercial inspectors are adequately trained in inspection procedures, documentation, and enforcement related to storm water pollution prevention.

#	Activities	Compliance Date	Responsible Party
A.	Develop training procedures.	Done	ESD-WE
B.	Conduct initial training based on the training procedures for new industrial/commercial inspectors.	As Needed	ESD-WE
C.	Provide on-the-job training and other training opportunities such as industrial/commercial inspection workshops.	Ongoing	ESD-WE

**IND 6 - Outreach**

The City of San Jose will help develop and distribute outreach and technology transfer material containing applicable control measures and/or BMPs to industrial/commercial facility operators responsible for IND activities.

#	Activities	Compliance Date	Responsible Party
A.	Identify and list existing outreach and technology transfer material (See Appendix C, Matrix C2). Distribute applicable outreach and technology transfer material to industrial/commercial facility operators per Appendix C, Table 2. Document to the RWQCB that outreach and technology transfer material and/or BMPs have been distributed, as needed, to industrial/commercial facility operators.	Annually Distribution: Ongoing	ESD-UR
B.	Determine usefulness of outreach and technology transfer materials by obtaining feedback from industrial/ commercial facilities. Obtain feedback from inspectors about the effectiveness of existing outreach and technology transfer material.	As Needed	ESD-UR

**IND 7 - NOI Filers Effectiveness Evaluation**

The City of San Jose’s Watershed Enforcement staff will review and evaluate the effectiveness of its NOI Filers inspections procedures and database tracking system.

#	Activities	Compliance Date	Responsible Party
A.	Document and evaluate the effectiveness of NOI Filers inspections procedures.	Annually	ESD-WE
B.	Document and evaluate the effectiveness of the NOI Filers database tracking system.	Annually	ESD-WE

#	Activities	Compliance Date	Responsible Party
C.	Document and evaluate what worked well and what needs improvement.	Annually	ESD-WE

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## Monitoring

### MON Work Plan

The City, in conjunction with the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) has submitted, to the RWQCB, a Multi-Year Receiving Waters Monitoring Plan required per permit provision C.7.b. The final version of the plan was submitted March 1, 2002. The Multi-Year Plan covers a number of pollutant control programs required by C.7 and C.9 provisions of the permit. The City continues to support Program staff in the implementation of the plan by commenting on annual plans, providing guidance for sampling within the City, and participating in the Watershed Analysis Ad Hoc Task Group.

The 2001 C.9 permit provisions require implementation of control programs for Copper, Nickel, Mercury, Pesticides, PCBs, and Dioxin-like compounds. The City continues to support and assist the Program efforts to address these control and monitoring efforts. Additionally, the City is actively involved as stakeholder and workgroup member for the Guadalupe Mercury TMDL effort, and will continue to contribute and comment on products and reports generated by Baywide TMDLs for copper, nickel, mercury and PCBs.

#### PCB Control Program

Analytical characterization work to support the PCB Control Program, required under provision C.9.e, has been completed. The Program is currently working on next steps with BAASMA and CEP.

Initial PCB analysis was performed on sediments found in selected urban storm drain systems. At this point, no known controllable sources of PCBs have been identified. Results of the follow-up analytical work have been reviewed and further sampling work to identify controllable sources was undertaken in October and November of 2002. The final PCB control plan approach was submitted by the SCVURPPP Program by July 1, 2002. In addition, the City continues to implement activities described in "Next Steps" from the Year Two PCB Case Study Report submitted to the Regional Board in July 2003.

#	Activities	Compliance Date	Responsible Party
A.	Identify sampling sites that may contain PCB contaminated sediment based on land use, anecdotal information, and suitability of the site for data collection.	Done, 6/00	
B.	Conduct initial sampling at four sites determined by Task A.	Done 10/00 & 3/01	
C.	Prepare and submit to the Program a case study report for drainage areas associated with initial PCB sampling.	Done 10/01	
D.	Conduct a second round of sampling at 10 additional sites selected for follow up study.	Done 11/01	
E.	Submit a report on second-year watershed characterization studies to	Done FY 01-02	

#	Activities	Compliance Date	Responsible Party
	the regional board.		
F.	Complete draft work plan with additional actions related to identifying PCBs sources & implementing controls & schedule for their completion.	Done FY 01-02	
G.	Begin implementation of final PCB Control Plan upon approval.	<i>TBD</i> Done FY 02-03 & Ongoing	ESD

**Dioxin-like Compound Control Program**

Characterization of dioxins based on existing data has begun Program-wide. The Program is collaborating with Alameda County who has already initiated an investigatory program for Dioxin-like compounds.

This Dioxin-like Compound Control Program will develop procedures to identify, assess, and manage controllable sources of Dioxin-like compounds found in urban runoff.

#	Activities	Compliance Date	Responsible Party
A.	Characterize distribution of Dioxin-like compounds in the urban runoff system based on existing data.	Done FY 01-02	
B.	Begin implementation of SCVURPPP plan to characterize distribution of Dioxins.	In Progress at Program Level	
C.	Submit plan that identifies control measures / management practices to eliminate or reduce discharges of Dioxins, if needed.	TBD	

**Sediment Control Program**

The City’s sediment control program falls predominantly within the Construction Inspection (CON) section of this work plan. Sediment monitoring activities also continue in conjunction with the SCVURPPP Five-Year Receiving Waters Monitoring Plan.

**Pilot Monitoring Programs**

In addition to the above listed control programs, the City concluded activities performed in support for the two Monitoring Pilot Programs that were begun in 1997. These pilot programs generated data that helped develop the follow-on programs of IND 6 (outreach to industrial and commercial dischargers) and the SCVURPPP Five-Year Receiving Waters Monitoring Plan.

**MON 1 - Industrial Storm Water Monitoring Pilot Program**

This program sampled key industrial sites to determine the significance of metal contaminate storm water discharges associated with industrial activities. The ultimate objective from this

project of educating industrial and commercial dischargers about developing and implementing SWPPPs and BMPs has now been turned over to the Industrial and Commercial Dischargers section of this workplan under item IND 6.

#	Activities	Compliance Date	Responsible Party
A.	Review data used to estimate the industrial contribution of pollutants to storm system in MCMP.	Done, 5/97	
B.	Identify monitoring objectives based on issues identified in Task A. Select industry group.	Done, 6/97	
C.	Identify willing industry participants. Review site SWPPPs.	Done, 7/97	
D.	Design sampling program for industry sites identified per Task C.	Done, 8/97	
E.	Conduct sampling during first 30 minutes of effective storm events.	Done, 4/98	
F.	Analyze data per the program objectives.	Done, 5/98	
G.	Develop guidance for industry to improve SWPPP implementation and monitoring.	Done, 6/98	
H.	Provide technology transfer information and training to industry and municipal inspectors. <ol style="list-style-type: none"> <li>1. Identify facilities for general outreach/awareness programs</li> <li>2. Develop education materials for general outreach programs. Identify appropriate forum for outreach efforts.</li> <li>3. Train trade organizations in Industrial Activities Storm Water General Permit requirements. Gain involvement developing outreach programs. Conduct outreach.</li> <li>4. Identify industrial facilities for focused BMP development.</li> <li>5. Gain participation of trade organizations in identifying significant pollutant sources and developing appropriate BMPs.</li> <li>6. Conduct program to develop BMPs and measure effectiveness.</li> </ol>	Done FY 01-02 Ongoing as part of IND 6	

**MON 3 - First Flush Monitoring Program**

First flush discharge areas along The Coyote Creek and Guadalupe River were monitored for three wet seasons. The City provided data to the Program for analysis and comparison to other data in June of 2002. The Program submitted a final report to the Regional Board in 2003; it was included as appendix C-2 in the Program's 02-03 Annual Report.

#	Activities	Compliance Date	Responsible Party
A.	Identify sampling sites based on land use, and suitability of the site for data collection.	Done, 6/97	
B.	Train staff on sampling procedures, protocols and safety measures.	Done, 9/97	
C.	Collect representative samples from first effective rainfall and every opportune rainfall event of the season.	Done 4/98 thru 4/00	

#	Activities	Compliance Date	Responsible Party
D.	Analyze each season's data to characterize runoff constituents.	Done 6/98 thru 6/00	
E.	Provide screen of analysis to further identify location and extent of pollutants for source control and outreach efforts.	Done 7/98 thru 6/00	
F.	Based on analysis, provide information for targeting sampling.	Done FY 02-03	
G.	Compare results with other sites, regional monitoring efforts, trends and other data to provide indication of relative magnitude of pollutant problem.	Done FY 02-03	
H.	Explore modeling approaches to characterize water quality in the watershed and target additional monitoring efforts.	Done FY 02-03	
I.	Provide data to SCVURPPP Program as part of 5-Year Monitoring Program.	Done FY 02-03	

## New and Redevelopment NDC Work Plan

The New and Redevelopment C.3 provision in the NPDES permit of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) requires all dischargers covered by the permit, including the City, to modify their project review processes as needed to incorporate conditions of approval in permits for applicable projects, as defined in the provision, to ensure that pollutant discharges are reduced by incorporation of treatment measures and other appropriate source control and site design measures, and increases in runoff flow are managed in accordance with the provision to the maximum extent practicable.

The City met the October 15, 2003 deadline for beginning implementation of hydraulic sizing requirements for stormwater treatment BMPs. Implementation of these requirements will be phased in for additional projects during 04-05. The City will begin implementation of peak flow control requirements, as required in the permit, following approval of a SCVURPPP Hydromodification Management Plan (HMP) by the Regional Board.

### NDC 1 - Legal Authority

The City of San José **has and** will **continue to** evaluate the adequacy of its legal authority to implement new development control measures as it considers modifications to its development plan review and approval procedures.

### NDC 2 - Guidance to Developers

The development community is provided with guidance on post construction measures as early in the application process as possible.

#	Activities	Compliance Date	Responsible Party
A.	Draft necessary revision(s) to Guidance Manual on Selection of Stormwater Quality Control Measures to allow incorporation of hydraulic sizing design criteria and provide to developers.	Done FY 02-03	PBCE, ESD, PW, RDA
B.	Provide development community with revised information and guidance materials concerning any adopted on site design, building permit requirements and hydraulic sizing design criteria and maintenance requirements for BMPs for stormwater treatment measures	Ongoing	PBCE, ESD, PW, RDA
	1. Coordinate w/ development community on proposed hydraulic sizing criteria for structural stormwater treatment measures and any proposed revisions to Guidance Manual and policy through workshops and regular meetings.	<del>6/30/03</del> Ongoing	PBCE, ESD, PW, RDA
	2. Develop guidance material regarding maintenance responsibilities for any adopted structural stormwater treatment measures requirements.	<del>6/30/03</del> Done FY 02-03	PBCE, ESD, PW, RDA, Program

### NDC 3 - CEQA Requirements

Environmental documents required for those projects that fall under CEQA or NEPA review, such as EIRs, negative declarations, and initial study checklists, will address:

- 1) Storm water quality impacts for land development during construction and after construction has been completed (both significant and cumulative),
- 2) Required permits, and
- 3) Specific mitigation measures related to storm water quality.

#	Activities	Compliance Date	Responsible Party
A.	Review and evaluate the City’s Environmental Review procedures to improve the review for water quality impacts and identification of mitigation measures. (Provision C.3.m.)  1. Identify areas where new or additional water quality review processes and related documents or checklist questions are needed and propose schedule for revision.  2. Implement any necessary revisions to water quality questions and procedures, if needed.	<del>03/01/03</del> <b>Ongoing</b>	PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA
B.	Report on revisions made to environmental review processes.	<del>FY 02-03</del> <i>Annual Report</i> <b>Annually</b>	PBCE, ESD, PW, RDA

### NDC 4 - Project Mitigation Measures and Provision. C.3. design requirements implementation

Developers of projects with significant storm water pollution potential will be required by the City of San José to mitigate storm water quality impacts to the maximum extent practicable, through proper site planning and design techniques and/or addition of permanent storm water quality control measures

#	Activities	Compliance Date	Responsible Party
A.	Propose revisions to current Policy on Post-Construction Urban Runoff Management as necessary to incorporate hydraulic sizing design criteria.  <b>1. Revise policy as needed for Group 2 &amp; HMP implementation</b>	<del>7/01/03</del> <b>Done FY 03-04</b>  <b>4/15/05</b>	PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA
B.	Review and modify development permit approval procedures as necessary for adopted revisions.  1. Develop criteria & checklist to aid Department of Planning, Building & Code Enforcement & Department of Public Works planners & engineers in determining whether a development project should be required to incorporate post-construction treatment control measures & their related operation and maintenance requirements.  2. Draft standard conditions of approval as necessary to ensure	<del>7/01/03</del> <b>Done FY 03-04</b>  <del>7/01/03</del> <b>Done FY 02-03</b>  <del>7/01/03</del>	PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA  PBCE, ESD, PW,

#	Activities	Compliance Date	Responsible Party
	proper selection, design of and installation of structural stormwater treatment measures per Provision C.3.b., c., d. 3. Draft standard conditions of approval as necessary to ensure proper maintenance of structural stormwater treatment measures. (Provision C.3.e.) 4. <b>Refine and modify development approval procedures as needed to accommodate HMP and Group 2 implementation</b>	<b>Done FY 02-03</b> <del>7/01/03</del> <b>Done FY 02-03</b>  <b>4/15/05</b>	RDA PBCE, ESD, PW, RDA PBCE, ESD, PW, RDA
C.	Implement any new adopted development conditions of approval, and procedures to developments with significant storm water pollution potential. (Provision C.3.b.)	<del>7/01/03</del> <b>Ongoing</b>	PBCE, ESD, PW, RDA
D.	Collect data on the projects for enhanced annual reporting. Produce a list of projects and data tracked for the last two years and provide to SCVURPPP for analysis. (Prov. C.3.c.)	<del>FY 02-03</del> Annually <del>thereafter</del>	PBCE, ESD, PW, RDA
E.	Draft post-construction treatment BMP certification procedures. (Provision C.3.h)  1. Evaluate implementing an alternative certification program and develop one if deemed necessary. (Provision C.3.h.)	<del>07/01/03</del> <b>Done FY 03-04</b> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA PBCE, ESD, PW, RDA
G.	First report to City Council on Alternatives Program. (Provision C.3.g.)	<del>6/30/03</del> <b>Done FY 03-04</b>	PBCE, ESD, PW, RDA
H.	Develop list of Annual Reporting requirements from Provision C.3. Design data tracking needs and protocols.  1. Compile a list of new development and redevelopment projects by name, type of project, site acreage, site acreage or square footage, square footage of new impervious surface, treatment BMPs and numeric sizing criteria used for applicable projects. Also, the source control measures required and pesticide reduction measures.  2. Track name and location of projects in the Alternatives Program, project type and size, percent impervious surface, reason for granting waiver, terms of waiver, equivalent benefit provided, alternative treatment project or regional project receiving the benefit and date of completion of the alternative treatment project or regional project.	<del>06/30/03</del> <b>Done FY 02-03</b>  <del>FY 03-04</del> Annually <del>thereafter</del>  <del>FY 03-04</del> Annually <del>thereafter</del>	PBCE, ESD, PW, RDA PBCE, ESD, PW, RDA PBCE, ESD, PW, RDA
I.	Participate on SCVURPPP's Hydromodification Management Plan work group and develop procedures for limiting peak stormwater runoff discharge rates from development projects. (Provision C.3.f.)	<del>HMP due 10/03</del> <b>Ongoing as Needed</b>	PBCE, ESD, PW, RDA
J.	Review the design standards and guidance for opportunities to make revisions that would result in reduced impacts to water quality and summarize how they were incorporated into approval procedures. Such revisions are listed in Provision C.3.j.  1. Identify and document existing site design standards and guidance documents and policies.	<del>6/30/04</del> <del>Annually</del> <del>thereafter</del>  <b>Due 9/15/03</b> <b>Done FY 03-04</b>	PBCE, ESD, PW, RDA PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
	2. Compile a Report on Site Design Measures and Revised Standards: Identify areas where new or additional site design measures are needed and propose timeline for revision. 3. Revise Site Design Measures and Standards, if necessary.		PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA
K.	Review the existing source control measures contained in site design standards, guidance documents and conditions of approval for opportunities to limit storm water pollution. (Provision C.3.k.) 1. Identify and document existing source control measures, guidance documents, and conditions of approval. 2. Compile a Report on Existing Source Control Measures: Identify areas where new or additional source control measures are needed and propose timeline for revision of conditions of approval and guidance 3. Revise conditions of approval and guidance, if needed.	<del>6/30/03</del> Ongoing	PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA
L.	Review General Plan and revise as necessary to incorporate water quality and watershed protection principles and policies, and summarize revisions made. (Provision C.3.l.) 1. Identify and document existing General Plan principles and policies. Compile a Report on Existing General Plan principles and policies. 2. Identify areas where new or additional General Plan principles or policies are needed and propose timeline for revision, if needed. 3. Make revisions to General Plan principles and policies, if needed, per work plan.	7/1/05	PBCE  PBCE  PBCE  PBCE
M.	Develop & propose enhanced reporting format for documenting use of pesticide reduction measures at development sites. (Provision C.3.n. & C.9.ii.) 1. Based on City’s Pesticide Management Plan, establish criteria for tracking percentage of new development projects for which pesticide reduction measures were required & begin tracking. (Provision C.3.n. & C.9.d.ii)	Done  <del>6/30/03</del> Done FY 03-04 Implementation Ongoing	PBCE, ESD, PW, RDA  PBCE, ESD, PW, RDA

**NDC 5 - Developer Conformance with State Requirements**

Developers of projects that disturb a land area of ~~five one~~ **one** acres or more are required by the City to demonstrate conformance with the State General Construction Activity Storm Water Permit including filing of NOI, development of a SWPPP, et al. (Note: beginning in 1/03, the applicable land area changed **from 5 acres** to one acre or more.)

#	Activities	Compliance Date	Responsible Party
A.	Include as condition of approval for projects that disturb a land area of one acre or more, a requirement to demonstrate coverage under the	Ongoing	PBCE, PW, RDA



#	Activities	Compliance Date	Responsible Party
	State General Construction Activity Storm Water Permit.		
B.	Track the projects that contained above condition of approval.	Annual Report	PBCE, PW, RDA
C.	Review, evaluate, and modify, as necessary, existing Planning procedures & conditions of approval to incorporate change in applicable land area to one acre or more starting 01/03.	Done FY 02-03	PBCE

**NDC 6 - Developer Erosion Control Plans**

Developers of projects with potential for significant erosion and planned construction activity during the wet season are required by the City of San José to prepare and implement an effective erosion and/or sediment control plan or similar document prior to the start of the wet season.

#	Activities	Compliance Date	Responsible Party
A.	Include as a condition of approval for applicable projects a requirement to prepare and implement an erosion and sediment control plan.	Ongoing	PBCE, PW, RDA
B.	Track the projects that contained above condition of approval.	Ongoing	PBCE, PW, RDA

**NDC 7 - Operation and Maintenance for Structural Storm Water Controls**

Developers of projects that include installation of permanent structural storm water controls are required by the City of San José to establish and provide a method for operation and maintenance of such structural controls.

#	Activities	Compliance Date	Responsible Party
A.	Work with SCVURPPP to <del>revise NDC 7 Performance Standard</del> . <b>develop guidance for implementing O&amp;M Program.</b>	<del>06/30/03</del> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
B.	Draft policy and procedures for an operation and maintenance verification program.	<del>10/15/02</del> <b>Policy Drafed</b> Done FY 02-03  <b>Procedures</b> <b>6/30/04</b>	PBCE, ESD, PW, RDA
C.	Draft summary of details of operation and maintenance verification program: organizational structure, evaluation, proposed improvements, inspections and follow-up, including criteria for setting priorities. (Provision C.3.e.)	<del>6/30/03</del> <b>6/30/04</b>	PBCE, ESD, PW, RDA
D.	Include as a condition of approval a requirement that developers of projects that include installation of permanent structural storm water controls are required to establish and provide proof of operation and maintenance of such structural controls.	<b>Done FY 03-04</b> Ongoing	PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
	1. Develop model permit conditions with fact sheets to include in use permits where appropriate. <del>Develop procedures for verifying maintenance of post construction treatment BMP will be maintained.</del>	<del>3/01/03</del> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
	2. In-ground BMPs	<del>7/15/03</del> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
	3. Landscape and all others	10/15/03 <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
	4. Compile a list of projects & responsible operators subject to C.3.e. provision.	<b>FY 03-04</b> <b>Annually thereafter</b>	PBCE, ESD, PW, RDA
E.	Track and compile a list of priority properties inspected and inspection results. (Provision C.3.e.iii.)	Ongoing <del>thereafter</del>	PBCE, ESD, PW, RDA
	1. <b>Revise</b> <del>Determine</del> criteria for setting priorities for inspection of structural stormwater treatment measures & inspection frequency.	<del>03/30/03</del> <b>6/30/04</b>	PBCE, ESD, PW, RDA
	2. <b>Revise</b> <del>Develop</del> local inspection program for verification of proper O & M.	<del>06/30/03</del> <b>6/30/04</b>	PBCE, ESD, PW, RDA

### NDC 8 - Applicability to Public Projects

The City of San José will include storm water quality control measures during and after construction, appropriate for each municipal capital improvement project, and that contractors comply with storm water quality control requirements during construction activities.

#	Activities	Compliance Date	Responsible Party
A.	Develop and implement a process to ensure that municipal capital improvement projects install structural storm water quality control measures as necessary.	<del>07/01/03</del> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
	1. Participate on SCVURPPP work group tasked with developing a technical guidance document for use by municipal staff to ensure that the document includes standard specifications and details, sizing methodologies, & model conditions of approval acceptable for use in City projects as necessary. (Provision C.3.b. & d.)	<del>6/30/03</del> <b>Ongoing</b>	PBCE, ESD, PW, RDA
	2. Review and revise Redevelopment Agency Project <del>approval</del> <b>Request for Proposal</b> procedures as necessary to comply with revised Provision C.3. requirements. (Provision C.3.c.)	<del>07/01/03</del> <b>6/30/04</b>	PBCE, RDA
	3. Review and Revise Public Works Capital Improvement Project approval procedures and Road Improvement Project approval procedures as necessary to comply with revised Provision C.3. requirements. (Provision C.3.c.)	<del>07/01/03</del> <b>Done FY 02-03</b>	PBCE, ESD, PW, RDA
B.	Review, evaluate, and modify the procedures, as necessary.	<del>07/01/03</del> As needed <del>thereafter</del>	PBCE, ESD, PW, RDA

#	Activities	Compliance Date	Responsible Party
C.	Begin tracking required data on the public projects subject to Provision C.3. hydraulic sizing criteria requirements for Annual Report.	<del>07/01/03</del> <b>Done FY 03-04</b>	PBCE, PW, RDA
D.	Monitor development of City's Green Building program for opportunities to discourage architectural use of copper in development projects (Prov. C.9.a.) and to incorporate urban runoff considerations.	Ongoing	PBCE, ESD, PW, RDA

### NDC 9 - City Staff Training

Key City staff is trained on planning procedures, policies, design guidelines, and BMPs for storm water pollution prevention annually.

#	Activities	Compliance Date	Responsible Party
A.	Provide training to Planning and Public Works staff on planning procedures, policies, design guidelines, and BMPs for storm water pollution prevention. (Provision C.3.a.vi.)	Ongoing	PBCE, ESD, PW, RDA
B.	Provide training to Redevelopment Agency and Department of Transportation staff on planning procedures, policies, design guidelines, and BMPs for storm water pollution prevention. (Provision C.3.a.vi.)	Ongoing	PBCE, ESD, PW, RDA, DOT
C.	Revise the training protocol to incorporate any newly adopted Provision C.3. permit requirements and related revised procedures.	<del>7/01/03</del> <b>As Needed</b>	PBCE, ESD, PW, RDA
D.	Train staff responsible for design review on pest-resistant landscaping techniques and model conditions of approval and the importance of minimizing pesticide use in runoff from development sites. (Provision C.3.n. and Provision C.9.d.ii)	Ongoing	PBCE, ESD, PW, RDA

### NDC 10 - Development Plan Review and Approval Procedures Effectiveness Evaluation

The City of San Jose will review and evaluate the effectiveness of its development plan review and approval procedures.

#	Activities	Compliance Date	Responsible Party
A.	Evaluate and incorporate any needed improvements in review and approval process.	Annually	PBCE, ESD, PW, RDA
B.	Document and evaluate what worked well and what needs improvement.	Annually	PBCE, ESD, PW, RDA

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## Construction Inspection

### CON Work Plan

This program element is implemented pursuant to permit provision C.2. The control measures discussed in this work plan apply to both private development projects and municipal public works construction projects. These control measures are implemented at construction project sites as part of the City's construction inspection and enforcement program.

FY 04-05 will be the second full year of implementation for the Standard Operating Procedure (SOP) for Construction Inspections that was developed for the 03-04 season. This new SOP includes the method by which PB&CE Building Division Inspectors address housekeeping measures at construction sites, in addition to the established roles of Environmental Services and Public Works inspectors.

FY 04-05 will also be the first season of implementation for the new language that was added as Sections 10-2 and 20-5.06 in the City of San Jose Department of Public Work's Standard Specifications. Revised in January 2004, these specifications include a separate bid amount for the implementation of the SWPPP, monthly certification from contractors certifying that BMPs are in place and being maintained, and the delay of invoice payment if such certifications are not kept current.

#### CON 1 - Site Housekeeping

The City ensures through a construction inspection program that construction contractors properly store, use, and dispose of construction materials, chemicals, and wastes at construction sites and prevent illicit discharges to storm drains and watercourses.

#	Activities	Compliance Date	Responsible Party
A.	PB&CE Building Division Inspectors develop SOPs to address housekeeping measures at construction sites.	<del>6/02</del> Done FY 03-04	PBCE-Bldg
B.	Develop hand-off procedure for transferring project information and status to ensure Building Inspectors are informed of project site data collected by Public Works Inspectors.	<del>6/02</del> Done FY 03-04	PBCE-Bldg, PW ESD
C.	Track & document incidents of housekeeping issues at construction sites.	Ongoing	PBCE-Bldg, PW ESD-WE

#### CON 2 - Local Ordinance

For development projects with significant erosion potential and planned construction activity during the wet season, the City ensures, through a construction inspection program, that erosion and/or sediment control measures are implemented in accordance with local ordinances and project conditions of approval and maintained as needed during construction.

#	Activities	Compliance Date	Responsible Party
A.	Review existing legal authority to conduct and enforce construction site inspections, if necessary revise.	Done FY 02-03	
B.	Identify needed ordinance changes	Done FY 02-03	
	1. Identify timeline for revised grading ordinance	Done FY 02-03	
C.	Develop SOPs & conduct training for inspection of construction sites requiring erosion control plans before wet season. Include enforcement (see Environmental Engineering Enforcement Procedures)	Annually	PW ESD-UR ESD-WE

### CON 3 - Construction Inspection Frequency

The City inspects construction sites for adequacy of storm water control measures. The frequency of inspections for active sites is at least once per month, or more frequently based on size of project, site conditions, precipitation, & project’s potential impact on storm water quality.

#	Activities	Compliance Date	Responsible Party
A.	Review construction inspection procedures to incorporate performance standards requirements for monthly inspections into SOPs.	Done FY 02-03	
B.	Document inspections of active construction sites.	Annually	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD
	1. Evaluate use of Amanda system for tracking inspection information.	06/30/04	PW PBCE-Bldg ESD
C.	Evaluate the effectiveness of the construction inspection program and make improvements, as necessary.	Done FY 01-02	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD

### CON 4 - Wet Season Preparation

Prior to the beginning of the wet season each year, the City inspects all sites requiring erosion and/or sediment control plans, to ensure that measures have been taken to minimize erosion and discharges of sediment from disturbed areas.

#	Activities	Compliance Date	Responsible Party
A.	Review and revise, as needed, procedures for Public Works staff regarding wet season construction requirements.	As Needed	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD
	1. Develop and implement revised standard specifications for public	FY 03-04	PW-AE, ECS,

#	Activities	Compliance Date	Responsible Party
	projects.	Ongoing	PRF, TDS
B.	Document pre-season inspection of construction sites to ensure adequate implementation of winterizing BMPs, prior to the wet season.	Annually	PW-AE, ECS, PRF, TDS

### CON 5 - Inspection and Site Evaluation Follow-up

Construction sites with inadequate erosion/sediment controls are given verbal and/or written notice of the inadequacies, according to the City's enforcement procedures, and followed up with action(s) commensurate with the risk of pollutants entering City storm drains or waterways. Written notices and follow-up actions are tracked and summarized in the City's Annual Report to the Regional Board.

#	Activities	Compliance Date	Responsible Party
A.	Draft and implement procedures for follow-up actions and graduated levels of enforcement, to be used on construction sites.	Done FY 02-03	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD
B.	Track and summarize notices and follow-up actions for annual reports.	Annually	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD
C.	Evaluate the feasibility of increasing the # of staff with the authority to issue enforcement actions.	<del>6/30/03</del> <b>FY 03-04</b>	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD

### CON 6 - Municipal Training

The City provides training annually to its construction inspection staff on inspection procedures, documentation, and enforcement related to storm water pollution prevention. All inspectors receive training on the latest construction-related storm water pollution prevention techniques and appropriate follow up actions at least once every two years. The City keeps documentation that inspectors have received training.

#	Activities	Compliance Date	Responsible Party
A.	Revise training curriculum to incorporate revised notice and follow-up requirements and graduated levels of enforcement. Develop training materials to address wet season construction and housekeeping. Develop training materials to address dry season construction and housekeeping.	<del>6/03</del> <b>Done FY 02-03</b>	ESD-UR ESD-WE PW PBCE-Bldg  Also Program & RWQCB
B.	Develop training schedule and staff feedback plan regarding	<del>6/03</del>	ESD-UR

#	Activities	Compliance Date	Responsible Party
	inspection procedures.	<b>Done FY 02-03</b>	
C.	<p>Conduct training for Public Works, ESD, and Building Inspection staff on new standard operating procedures for erosion control plan review inspection process (at least once every 2 years).</p> <p>Conduct training of Planning, Building &amp; Code Enforcement-Building Division inspectors regarding housekeeping BMPs.</p> <p>Train DPW &amp; PBCE inspectors on new SOPs for inspection during wet season.</p> <p>Train DPW &amp; PBCE inspectors on new SOPs for inspection during dry season.</p>	Ongoing	ESD-UR ESD-WE PW PBCE-Bldg  Also Program & RWQCB
D.	Track and document that inspectors have received training.	Annually	ESD-UR
E.	Evaluate the training curriculum and frequency and improvements, as necessary.	Annually	ESD-UR

**CON 7 - Outreach**

The City provides outreach materials to contractors, developers, and municipal staff on construction BMPs and compliance with the State General Construction Activity Storm Water Permit.

#	Activities	Compliance Date	Responsible Party
A.	<p>Review outreach/technology transfer materials and make improvements, as necessary</p> <p>1. Develop outreach materials to address wet season construction.</p>	Annually  <del>6/03</del> <b>Done FY 02-03</b>	ESD-UR ESD-WE  ESD-UR ESD-WE
B.	Review SOPs for distributing outreach/technology transfer material by inspectors.	<del>6/03</del> <b>Done FY 02-03</b>	ESD-UR ESD-WE
C.	Conduct outreach sessions to development community.	<del>6/03</del> <b>Ongoing, Q2</b>	ESD-UR ESD-WE PW PBCE-Bldg  Also Program & RWQCB
D.	Document outreach to development community.	Annually	ESD-UR
E.	Evaluate outreach program and make improvements, as necessary.	Annually	ESD-UR ESD-WE PW PBCE-Bldg



**CON 8 - Public Works Projects**

The City will develop and implement a process to ensure that contractors hired to construct public works projects have adequate erosion control plans and use appropriate Best Management Practices (BMPs) adopted by the Department of Public Works.

#	Activities	Compliance Date	Responsible Party
A.	Develop & conduct training for Public Works capital improvement project staff (Architectural Engineering Design & Construction and Streets, Bridges & Sewers Design and Construction) on contract language & enforcement.	Done FY 02-03 Annually	PW-AE, ECS, PRF, TDS  ESD
B.	Track the number of Public Work projects with these requirements	<del>6/03</del> Annually	PW-AE, ECS, PRF, TDS

**CON 9 - Construction Inspection Effectiveness Evaluation**

The City of San Jose will review and evaluate effectiveness of its construction inspection SOPs and BMPs.

#	Activities	Compliance Date	Responsible Party
A.	Evaluate and incorporate any needed improvements in construction inspection SOPs and BMPs.	Annually	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD-WE ESD-UR
B.	Document and evaluate what worked well and what needs improvement.	Annually	PW-AE, ECS, PRF, TDS PBCE-Bldg ESD-WE ESD-UR

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## Public Streets, Roads, & Highways

### PSR Work Plan

This program element is implemented pursuant to permit provision C.2.

Training will continue to cover the SOPs and appropriate BMPs for Department of Transportation activities with the highest potential for storm water pollution. These activities include spill response, resurfacing, sealing and patching, saw-cutting, street sweeping, landscape chemical application, concrete installation, pavement stripping, legend removal, and catch basin inspection after irrigation repair. BMP effectiveness evaluation from crew members is obtained during the training sessions.

Rural Public Works SOPs were written in FY 03-04 and staff training related to storm water pollutant reduction during operations and maintenance activities in the City's regional and neighborhood parks and other "rural areas" is scheduled for the current fiscal year. This training will be conducted annually for the near term.

#### PSR 1 - Implementation of BMPs

The City of San José will implement Best Management Practices (BMPs) for street, road, and highway operation and maintenance (O&M) activities to reduce pollutants in storm water and eliminate illicit discharges to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Identify BMPs currently used by staff as well as areas where BMPs still need to be developed per baseline model.	Done	DOT, ESD
B.	Audit areas beyond the scope of the baseline model.	Done	DOT, ESD
C.	Develop additional BMPs based on audit results as needed.	Done	DOT, ESD
D.	Develop SOPs based on BMPs.	Done	DOT, ESD
E.	Create plan to integrate BMPs and SOPs into training program.	Done	DOT, ESD
<del>F.</del>	<del>Deleted</del>	<del>Deleted</del>	
G.	Update BMPs as indicated.	Annually	DOT, ESD

**PSR 2 - Contractor Use of BMPs**

The City of San José will develop & implement a process to ensure that contractors employed to perform street, road, & highway O&M activities use appropriate BMPs adopted by the agency.

#	Activities	Compliance Date	Responsible Party
A.	Contract managers for public street, road, and highway O&M contracts will be trained on related storm water BMPs annually.	Done FY 02-03 Annually	DOT, ESD
B.	Investigate the development of standard contract language for PSR maintenance activities.	6/30/04	DOT, ESD

**PSR 3 - City Staff Annual Training**

The City of San José will provide annual training to its municipal staff in the use of appropriate BMPs. The City will also provide a mechanism for obtaining feedback from staff on the implementation and effectiveness of the BMPs and Control Measures.

#	Activities	Compliance Date	Responsible Party
A.	Identify training goals by reviewing level of use of BMPs by staff.	Done	DOT, ESD
B.	Identify training opportunities.	Annually	DOT, ESD
C.	Create training modules for affected City staff and contractors formatted for available training opportunities.	Done FY 01-02 <b>As needed</b>	DOT, ESD
D.	Create collateral material based on training modules.	Done FY 01-02 <b>As needed</b>	DOT, ESD
E.	Schedule training with affected supervisors. <b>1. Improve the focus of the training on the specific BMPs used by a section.</b>	Annually <b>6/30/04</b>	DOT, ESD DOT, ESD

**PSR 4 - Notification of Public Agencies**

The City of San José will inform other parties (e.g., CalTrans, the County of Santa Clara, and public utilities) conducting street, road, and highway O&M activities within its jurisdiction of the requirements to implement BMPs and Control Measures to reduce pollutants in storm water to the maximum extent practicable and eliminate illicit discharges.

#	Activities	Compliance Date	Responsible Party
A.	Identify conditions under which another agency will be notified of City O&M operations.	Done	
B.	Draft notification procedure.	Deferred	
C.	Review and comment from internal and external stakeholders.	Deferred	
D.	Distribute final policy to internal & external organizations &	Deferred	

#	Activities	Compliance Date	Responsible Party
	agencies.		

**PSR 5 - BMP Effectiveness Reviews**

As part of the annual review process, the City of San José will review and evaluate the effectiveness of its BMPs in reducing pollutants in storm water and eliminating illicit discharges.

#	Activities	Compliance Date	Responsible Party
A.	Draft procedure for annual effectiveness reporting, including sub-procedures for gathering feedback from affected supervisors and for modifications to BMPs & SOPs as necessary.	Done FY 01-02	DOT, ESD
	<b>1. Review Procedures for annual effectiveness evaluation. Consider obtaining feedback from supervisors on how to assess BMP effectiveness and the use of training sessions with staff as an opportunity to evaluate BMPs and SOPs.</b>	<b>FY 04-05</b>	<b>DOT, ESD</b>
B.	Review and comment on draft procedure from stakeholders.	Done FY 01-02	DOT, ESD
C.	Distribute final procedure to stakeholders.	Done FY 01-02	DOT, ESD

**PSR 6 - Rural Public Works Maintenance and Support Activities**

The goal of the Rural Public Works Performance Standard is to minimize the water quality impacts resulting from public works maintenance and support activities in rural areas.

#	Activities	Compliance Date	Responsible Party
A.	<i>Identify rural public works facilities that are under City of San Jose jurisdiction.</i> (reworded for clarity) <b>Identify City-owned properties that are applicable under the RPW performance standard.</b>	<del>6/30/03</del> <b>Done FY 02-03</b>	PRNS, GS, DOT, ESD
	<b>1. Evaluate the feasibility of using GIS information to identify additional applicable properties, if any.</b>	<b>6/30/04</b>	PRNS, GS, DOT, ESD
B.	Develop or adapt Standard Operating Procedures (SOPs) and Best Management Practices (BMPs) for rural public works activities.	<del>12/31/03</del> <b>Done FY 03-04</b>	PRNS, DOT, GS, ESD
C.	Provide annual training on appropriate SOPs/BMPs to City staff that perform rural public works operations & maintenance activities.	3/31/04	PRNS, DOT, GS, ESD
D.	Through contract specifications, require contractors hired by the City to use appropriate SOPs/BMPs when performing rural public works construction or maintenance.	6/30/05	PRNS, DOT, GS, ESD
E.	Annually conduct an evaluation of the effectiveness of the rural public works program, report the results in the Urban Runoff Annual Report. Identify items for continuous improvement.	Begin w/FY 03-04 Annually	PRNS, DOT, GS, ESD

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## Storm Drain System Operation & Maintenance

### SDO Work Plan

The Department of Transportation Standard Operating Procedures for catch basin cleaning and Problem Area reporting continues to be the focus of crew training. A map overlay has been created on Geographic Information System (GIS) that assigns serial numbers to each of the City's more than 27,000 storm drain inlets. This map overlay is currently in use as a means to facilitate problem area reporting in the Storm Drain system.

SDO 1B indicates that the City is performing Tier II inspection and cleaning for catch basins. Severe budget constraints in the coming year may require that the City perform inspection and cleaning to some modified version of Tier II in FY 04-05.

#### SDO 1 - O&M BMP Implementation

The City of San José will implement best management practices (BMPs) for the storm drain system operation and maintenance (O&M) to reduce pollutants in storm water to the maximum extent practicable. Specific BMPs for each type of O&M activity will be those listed in the City's Work Plan BMPs and Control Measures (Section 3).

#	Activities	Compliance Date	Responsible Party
A.	Audit BMPs.	Annually	DOT, ESD
B.	Implement an annual inspection and cleaning work plan to achieve a Tier 2 level review.	Done Ongoing	DOT
C.	Create procedure for collecting data on Problem Areas from City field personnel.	Done	
D.	Review and revise procedure for collecting data on Problem Areas from City field personnel.	Done FY 01-02	
E.	Create plan for coordinating data tracking between ICID & Storm Drain Management System databases. Include analysis of data to identify trends for targeting solutions.	Done FY 01-02	
F.	Review and revise plan for coordinating data tracking between ICID & Storm Drain Management System databases. Include analysis of data to identify trends for targeting solutions.	Done FY 01-02	
G.	Develop SOPs based on BMPs.	Done	
H.	Create any additional required BMPs, including structural controls.	<i>Done</i> <b>Ongoing as Needed</b>	DOT, ESD
I.	Develop SOPs based on BMPs and other programs or solutions identified by database analysis including revision of Problem Area list.	<i>Done</i> <b>Ongoing as Needed</b>	DOT, ESD

#	Activities	Compliance Date	Responsible Party
J.	Create plan integrating BMPs and SOPs into training program.	<i>Done</i> <b>Ongoing as Needed</b>	DOT, ESD
<del>K.</del>	<del>Allocate appropriate resources for supporting work plan</del>	Deleted FY 03-04	

**SDO 2 - Problem Tracking and Process Improvement**

The City of San José will develop and implement processes for tracking problem areas and ensuring that appropriate BMPs and SOPs will be implemented for storm drain operation and maintenance activities.

#	Activities	Compliance Date	Responsible Party
A.	Determine reporting requirements, including tracking Problem Areas.	Done	
B.	Create criteria for collecting data from City field personnel for the purposes of determining Problem Areas.	Done	
C.	Develop procedures for documenting frequency, nature, and type of recurring problem. Coordinate the data from ICID & Storm Drain Management System databases.	Done	
D.	Create procedure for data reports to be used to update Problem Area list. Include process and criteria for analyzing ICID trends.	Done FY 01-02	
E.	Revise documentation and problem area reporting procedure to improve reporting performance.	As Needed	DOT, ESD
F.	Produce Problem Area report.	<del>Done FY 01-02</del> Annually	DOT
G.	Create plan for addressing Problem Areas through ICID enforcement/ education activities, additional BMP development, program development or retrofit.	Done FY 02-03	
H.	<del>Implement work plan</del>	Deleted FY 03-04	



**SDO 3 - Contractor Use of BMPs**

All City SDO O&M is conducted in-house, and City staff receives BMP/SOP training annually. The only time storm drain maintenance might be contracted out would be for a rare flood emergency situation. The City has standard specifications that cover storm drain BMPs for construction activities.

#	Activities	Compliance Date	Responsible Party
A.	Contract managers for storm drain construction contracts will be trained on related storm water BMPs annually.	<del>Done FY 02-03</del> Annually	DOT, ESD

**SDO 4 - Staff Training and BMP Feedback**

The City of San José will provide annual training to its municipal staff in use of appropriate BMPs and/or Control Measures. The City will also provide a mechanism for obtaining feedback from staff on implementation and effectiveness of BMPs and Control Measures.

#	Activities	Compliance Date	Responsible Party
A.	Identify training goals by reviewing training needs of other performance standards.	Done	
B.	Provide training prior to the rainy season.  <b>Improve the focus of the training on the specific BMPs used by a section.</b>	Annually	DOT, ESD
C.	Create training modules for affected City staff formatted for available training opportunities.	<del>Done FY 01-02</del> <b>Ongoing as Needed</b>	DOT, ESD
D.	Produce schedule for training.	<del>Done FY 01-02</del> Annually	DOT, ESD

**SDO 5 - Data Analysis**

As part of the annual review process, the City of San José will evaluate data regarding cleaning activities and unusual flows observed during inspection. The review and evaluation will include consideration of storm drain structural retrofit.

#	Activities	Compliance Date	Responsible Party
A.	Draft procedure for annual review and evaluation of data.	Done FY 01-02	
B.	Include provisions for monitoring of trash as a part of routine outfall inspection.	Evaluated FY 02-03	
C.	Review and comment from stakeholders.	Done FY 01-02	
D.	Distribute final procedure to stakeholders.	Done FY 02-03	

**SDO 6 - BMP Effectiveness Reviews**

As part of the annual review process, the City of San José will review and evaluate the effectiveness of its BMPs in reducing pollutants in storm water and eliminating illicit discharges.

#	Activities	Compliance Date	Responsible Party
A.	Review with supervisors to get feedback and information on how to assess BMP effectiveness.	6/30/04	DOT, ESD
B.	Use annual training sessions with staff as an opportunity to evaluate the effectiveness of BMPs & SOPs.	Annually	DOT, ESD

## Pesticide Management Workplan

### PM Work Plan

This program element is implemented pursuant to permit provision C.9.d. Progress continues with implementing pest control BMPs and training staff on Integrated Pest Management (IPM) techniques. An IPM Policy was adopted in June 2003, as part of the City's Pollution Prevention Policy.

#### PM 1 - Integrated Pest Management

The City will adopt an Integrated Pest Management (IPM) policy and/or ordinance requiring use of IPM techniques in the agency's operations; and, minimization of pesticide use, particularly organophosphate and copper-based pesticides, by agency staff and contractors.

#	Activity	Compliance Date	Responsible Party
A.	Develop a section stating City IPM policy for inclusion in Pesticide Management Plan.	<del>6/03</del> Done FY 02-03	

#### PM 2 - Pesticide Management Plan

The City will develop and implement a Pesticide Management Plan that will minimize pesticide use and reduce the amount of pesticides in storm water and landscape runoff to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Draft a City of San Jose Pesticide Management Plan.	Done FY 01-02	
B.	Submit plan for City Manager approval.	Done FY 01-02	
C.	Publish City Management Plan in URMP.	Done FY 01-02	

#### PM 3 - IPM SOPs and BMPs

The City will develop and implement standard operating procedures (SOPs) and best management practices (BMPs) for implementing the IPM Policy

#	Activities	Compliance Date	Responsible Party
A.	Develop a list of pest specific SOPs & BMPs for implementing IPM policy.	Done FY 01-02	
B.	For each type of pest problem identified, seek model SOPs and BMPs from published literature.	Done FY 01-02	
C.	Incorporate or develop appropriate IPM measures into City SOPs & BMPs.	<del>6/03</del> Done FY 02-03	GS, DOT, ESD

#	Activities	Compliance Date	Responsible Party
		Ongoing as Needed	
D.	Update City URMP to incorporate model Pest Management Performance Standard, including description of legal authority (IPM policy & contract language), work plan elements, BMPs, & SOPs needed for implementation.	<del>6/03</del> <b>Done FY 02-03</b>	ESD

**PM 4 - City Employee Training**

The City will ensure that employees receive pest management training by implementing the following:

1. Employees who apply pesticides for the City will obtain the appropriate training as required by County Ag. Commissioner and State Department of Pesticide Regulation (DPR);
2. Employees within departments responsible for pesticide application will receive annual training on appropriate portions of City IPM Policy, SOPs, and BMPs, and latest IPM techniques;
3. Employees who are not authorized to apply pesticides will be annually trained not to use over-the-counter pesticides at workplace, consistent with IPM Policy.
4. Annual internal outreach will be conducted to employees, who do not necessarily purchase or apply pesticides during their course of work, on less toxic pest control and to encourage employees to use IPM techniques away from work.

#	Activities	Compliance Date	Responsible Party
A.	Ensure that employees who apply pesticides for the agency obtain appropriate training required by County Ag. Commissioner & State DPR.	Annually	GS, DOT
B.	Provide annual training on IPM Policy, SOPs, and BMPs, and latest IPM techniques to employees within departments responsible for pesticide application. Include in training, annually informing employees who are not authorized / trained to apply pesticides not to use over-the-counter pesticides at workplace, consistent with IPM Policy.  <b>1. Develop and integrate an IPM policy (approved June 2003) training into pesticide applicator training.</b>	<del>Done FY 01-02</del> Annually  <b>12/03</b>	GS, DOT, ESD  <b>GS, DOT, ESD</b>
C.	<b>Monitoring Mechanism I.B.1.</b> Document and evaluate effectiveness of staff training conducted each year in annual report.  <b>1. Develop and implement a class evaluation/survey for IPM training classes conducted by City staff.</b>	Annually  <b>12/03</b>	GS, DOT, ESD  <b>GS, DOT, ESD</b>
D.	Public Education & Outreach Task II.A.14 Conduct internal outreach on less toxic pest control to employees who do not necessarily purchase <del>of</del> or apply pesticides during the course of their work (to encourage employees to use IPM techniques away from work).	<del>Done FY 02-03</del> Annually	ESD

### PM 5 - Contractor Pesticide Management Requirements

The City will develop and implement a process to ensure that contractors employed to conduct pest control and pesticide application on municipal property engage in pest control methods consistent with City IPM Policy. Specifically, the City will require contractors to:

- follow City IPM policy, BMPs, and SOPs;
- provide evidence of current IPM training, when feasible; and
- provide documentation of pesticide use on City property to the City in a timely manner.

#	Activities	Compliance Date	Responsible Party
A.	Develop and implement a process to ensure contractors employed to conduct pest control/pesticide application on municipal property engage in methods consistent with City IPM policy.	<del>6/03</del> <b>Ongoing</b>	GS, DOT, ESD, PRNS, PW, RDA
B.	Develop a list of all contractors employed by the City who perform pest application work.	Done FY 01-02	GS, DOT, ESD, PRNS, PW, RDA
	<b>1. Review and update list of contractors.</b>	<b>6/30/04</b>	GS, DOT, ESD, PRNS, PW, RDA
C.	Implement a procedure to provide to each contractor a copy of the City IPM policy developed in Activity 2.A. above	<del>6/03</del> <b>Done, FY 02-03</b>	GS, DOT, ESD, PRNS, PW, RDA
D.	Identify pest specific SOPs and BMPs, developed in Activity 3.B above, that are appropriate in each contractor's case.	6/03	GS, DOT, ESD
E.	<del>Require City contracted PCOs to implement appropriate BMPs through contract specifications.</del>	<del>6/03</del> <b>Deleted See PM 5.F</b>	
F.	Require <b>through contract specifications that</b> PCOs contracted for municipal applications: a) follow City IPM policy, BMPs, and SOPs; b) provide evidence of current IPM training, when feasible; and c) provide documentation of pesticide use on City property to the City in a timely manner.	<del>6/03</del> <b>Ongoing</b>	GS
G.	<b>Monitoring Mechanism III.A.1.</b> Document numbers of PCOs receiving presentations and/or training on pesticide use by PCOs on municipal property.	<del>6/03</del> Annually <i>thereafter</i>	GS, ESD

**PM 6 - Pesticide Management Outreach**

The City will identify outreach activities it will conduct consistent with Program Pesticide Management Plan. Work plan elements will address outreach to residential and commercial pesticide users, pesticide retailers, and special districts. Information will be provided on less-toxic pest control practices, proper disposal of pesticides, and the City’s own IPM practices, as applicable.

#	Activities	Compliance Date	Responsible Party
A.	Increase awareness of IPM so target audiences recall less toxic pest management messages and adopt IPM behaviors. Target audiences include residential pesticide users, professional pest control businesses, customers of professional pest control businesses, pesticide retailers, school districts, and other special districts.	Annually	ESD
B.	Prepare IPM stories and press releases to local media.	Annually	ESD
C.	In conjunction with Program, provide information on less toxic pest control (e.g., IPM techniques, municipal IPM policies, model contract language, training opportunities, etc.) to neighboring special districts (e.g., VTA, sanitary and utility districts, open space districts, vector control districts, and school districts) as appropriate.	<del>6/03</del> <b>Pending Implementation by Program</b>	ESD
D.	Create & provide fact sheets & materials to pesticide retailers to facilitate point-of-purchase outreach to support IPM Store Partnership Program.	Annually Ongoing	ESD
E	Identify, Develop and implement education programs that target commercial businesses.	Done; Ongoing	ESD
F	<b>Monitoring Mechanism:</b> Document or estimate numbers of residents reached by outreach efforts, including events, web promotion, municipal employee outreach, and media advertising. Monitor responses to outreach efforts by documenting calls to the Program’s general and watershed campaign hotlines.	Annually	ESD
G	<b>Monitoring Mechanism IV.A.1.</b> Document outreach efforts targeting businesses, recommended in the work plan, to be developed by the Program. Implement evaluation component of the work plan.	Annually	ESD

**PM 7 - HHW Pesticide Disposal**

The City will coordinate with household hazardous waste (HHW) collection agencies to support, enhance, and help publicize programs for proper pesticide disposal.

#	Activities	Compliance Date	Responsible Party
A.	Work with HHW collection agencies to support, enhance, and publicize programs for pesticide disposal.	Annually	ESD
B.	Verify that adequate pesticide disposal services exist for residents and	<del>Done FY 01-02</del>	ESD

#	Activities	Compliance Date	Responsible Party
	conditionally exempt small quantity commercial generators.	Annually	
C.	Provide hazardous waste disposal information to residents, through distribution of materials (e.g., utility bill insert, city newsletter, community events, etc.) or advertising in local media.	Annually	ESD
D.	<b>Monitoring Mechanism V.A.1.</b> Document that HHW collection programs adequately serve residents and businesses and that any exchange programs do not exchange organophosphate or banned pesticides.	Annually	ESD

**PM 8 - City Pesticide Use Tracking**

The City will develop and implement a process for tracking pesticide use on municipally-owned property.

#	Activities	Compliance Date	Responsible Party
A.	Develop and implement a pilot pesticide tracking process for Diazinon and Chlorpyrifos products.	Done FY 01-02 <i>Annually</i>	
B	As part of the PMP, develop and implement a process for tracking pesticide use on municipally owned property. Include reporting and justification for use of OP pesticides and BMPs employed during OP pesticide use.  <b>1. Evaluate feasibility of implementing electronic data management system for pesticide use.</b>	<del>6/03</del> <b>Done, FY 02-03</b> Ongoing <b>12/31/04</b>	GS, DOT, ESD  <b>GS, DOT, ESD</b>
C.	<b>Monitoring Mechanism I.A.1.</b> Use pesticide tracking process to document pesticide use in annual reports.	Annually	GS, DOT, ESD, PRNS, PW, RDA

**PM 9 - City Pesticide Inventory Search**

The City will conduct periodic citywide search of its chemical inventory for pesticides no longer legal for application per EPA, State, and/or local requirements. These pesticides, if found, will be properly disposed pursuant to appropriate waste disposal regulations

#	Activities	Compliance Date	Responsible Party
A.	All Departments conduct Citywide search of chemical storage areas for pesticides no longer legal for application per EPA, State, and/or local requirements. Properly dispose of any such pesticides pursuant to appropriate waste disposal regulations.	Annually	GS, DOT

**PM 10 - Pesticide Management Plan / IPM Policy Review**

As part of annual reporting process, The City will review and evaluate, with input from municipal staff, the effectiveness of its Pest Management Plan and IPM Policy in achieving the goals of the Plan to the maximum extent practicable.

#	Activities	Compliance Date	Responsible Party
A.	Review and continuously improve goals, actions, and monitoring mechanisms of the work plan considering results of self-evaluations, comments from Regional Board staff and other interested parties, and results of local performance review meetings if any.	Annually	GS, DOT, ESD, PRNS, PW, RDA
B.	<b>Monitoring Mechanism IX.A.1.</b> Complete revised work plan that incorporates continuous improvement items, and report on completion of work plan tasks.	Annually	GS, DOT, ESD, PRNS, PW, RDA
C.	<b>Monitoring Mechanism VII.A.1.</b> Summarize types of pesticide reduction measures required (such as by conditions of approval) for new development & significant redevelopment projects, & percentage of new development/ significant redevelopment projects for which pesticide reduction measures were required. (Draft Permit Provision C.3.n.)	Annually	PW, RDA, ESD



## Mercury Workplan

### M Work Plan

This program element is implemented pursuant to permit provision C.9.c. In 2003, the Program approved a Guidelines document on the management of mercury-containing products by a municipal agency. The City will continue to implement management practices consistent with the guidelines.

The timing for outreach efforts regarding fluorescent tube recycling will be tailored to coincide with the County's implementation of a retail store drop-off program for fluorescent tubes.

#### M 1 - Municipal Use of Mercury-Containing Products

The City will eliminate all unnecessary municipal use of mercury-containing products and establish proper disposal methods for products that cannot be eliminated.

#	Activities	Compliance Date	Responsible Party
A.	Complete and report results of survey of mercury-containing products used by City departments.	Done FY 02-03	ESD
	<b>1. Conduct a follow-up Mercury-containing product survey</b>	<b>FY 03-04</b>	ESD
B.	Develop a mercury policy requiring the virtual elimination of mercury from controllable sources in urban runoff from agency operations.	Done FY 02-03	ESD, GS, DOT
C.	Implement SCVURPPP guidelines for mercury-containing products reduction and management. These guidelines will include a schedule for the timely phase-out of mercury-containing products identified for virtual elimination as well as reporting requirements, possibly to track recycling, replacement, & reduction in use of mercury-containing products.	<del>FY 03-04</del> <b>Ongoing</b>	ESD, GS, DOT
D.	Monitoring Mechanism I. Document completion of tasks in annual reports. Use mercury-containing product reporting guidelines (to be developed).	Annually	ESD

#### M 2 - Household Hazardous Waste Collection

The City will Provide mercury-containing product disposal services through household hazardous waste (HHW) collection programs for residents and small businesses, and encourage use of these programs.

#	Activities	Compliance Date	Responsible Party
A.	Provide mercury-containing products disposal services for residents and small businesses.	Ongoing	ESD-IWM
B.	Work with HHW collection agencies to develop and help publicize	<del>6/30/04</del>	ESD, Program

#	Activities	Compliance Date	Responsible Party
	fluorescent light recycling program to ensure maximum recycling.	Ongoing	

**M 3 - Monitoring and Science**

The City will participate in coordinated monitoring efforts to support mercury TMDL development and implementation, including assessment of air pollution sources of mercury and concentrations of mercury in sediment.

#	Activities	Compliance Date	Responsible Party
A.	Continue financial support of the Regional Monitoring Program (RMP), including the Mercury Deposition Network Pilot Study. Continue to actively participate in the RMP steering committee and technical review committee. - The City of San Jose will continue to provide in-kind services for the maintenance of the Mercury Deposition Network site near San Jose.	Ongoing	ESD

**M 4 - Regional, State, and Federal Coordination**

Actively participate in regional, state, and federal coordination efforts to achieve a reduction in the amount of mercury in urban runoff and air emissions.

#	Activities	Compliance Date	Responsible Party
A.	Collaborate in technical studies to support TMDL development and implementation including the Santa Clara Basin WMI Guadalupe River Mercury TMDL Workgroup.	Ongoing	ESD
B.	Support & participate in WMI Watershed Action Plan development.	Ongoing	ESD

**M 5 - Public Education and Outreach**

Increase awareness of proper disposal of mercury-containing products and available non-mercury containing alternatives. Target audiences include residential, commercial, and industrial users and municipal employees.

#	Activities	Compliance Date	Responsible Party
A.	Work with Program to develop and begin to implement a fluorescent light recycling outreach program to educate residential users and encourage proper disposal of fluorescent lights.	FY 03-04	ESD
B.	Work with Program to develop and begin to implement a fluorescent light recycling outreach program to educate small businesses and conditionally exempt small quantity generators and encourage proper disposal of fluorescent lights.	FY 03-04	ESD
C.	Coordinate with municipal inspectors to integrate mercury outreach	FY 03-04	ESD

#	Activities	Compliance Date	Responsible Party
	to industrial businesses into their existing routine pretreatment, source control, and/or hazardous materials inspection processes.		
D.	Develop and distribute “tailgate safety meeting cards” about mercury to inspectors and other municipal employees. (The Program will first review the product developed by the Fairfield-Suisun Sewer District when it is made available to the Bay Area Pollution Prevention Group (BAPPG).)	TBD	ESD
E.	Attend community events and distribute outreach materials. <b>See Attachment A: Outreach Activities Summary</b>	<i>As Needed</i> <b>Ongoing</b>	ESD
F.	<b>Monitoring Mechanism V.B.</b> Document and evaluate each outreach activity, including the target audience and number of residents and/or businesses reached.	Annually	ESD, Program

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## Water Utilities Operations & Maintenance

### WUO&M Work Plan

The City's Water Utility program is ongoing and is implemented pursuant to permit provision C.2.

#### **WUO&M 1 - Inventory of O&M Activities**

The City of San José's Municipal Water System will conduct an inventory of all-key operations and maintenance activities, and identify routine and unplanned non-storm water discharges from these activities. This inventory will be conducted every three years and evaluated at least once a year.

#	Activities	Compliance Date	Responsible Party
A.	Review current procedures for operations and maintenance.	3/03 Annually	ESD-Muni
B.	Three-year update of list.	3/03 Every 3 years Next Due 3/06	ESD-Muni

#### **WUO&M 2 - Implementation of WUPPP**

The City of San José's Municipal Water System will implement the pollution control measures identified in the Water Utility Pollution Prevention Plan (WUPPP) to manage chlorine, biocides, and algaecides and prevent erosion and sedimentation.

#	Activities	Compliance Date	Responsible Party
A.	Implement WUPPP/Report on activities	Annually	ESD-Muni

#### **WUO&M 3 - Staff Training and Contractor WUPPP Compliance**

The City of San José's Municipal Water System will conduct annual training for municipal staff and coordinate WUPPP elements with water utility project planning, including WUPPP elements (BMPs, conditions, specifications, etc., in contract and services agreements).

#	Activities	Compliance Date	Responsible Party
A.	Develop training program.	Done 11/98	ESD-Muni
B.	Implement training program.	Annually	ESD-Muni

**WUO&M 4 - WUPPP Effectiveness Evaluation**

The City of San José’s Municipal Water System will evaluate the effectiveness of the WUPPP annually. Maintain accurate documentation and revise the WUPPP as necessary.

#	Activities	Compliance Date	Responsible Party
A.	Develop evaluation program.	Annually	ESD-Muni
B.	Provide progress and update report to Santa Clara Valley Urban Runoff Pollution Prevention Program.	Annually	ESD-Muni

**Public Information / Participation**  
*Formerly Residential Outreach and Education (ROE)*

**PIP Work Plan**

For FY 2004-2005, the City’s PI/P work plan will focus on the following objectives:

1. Provide support for Santa Clara Basin Watershed Management Initiative (WMI) and Santa Clara Valley Urban Runoff Pollution Prevention Program (Program) activities. This will be done primarily through participation in the Watershed Education and Outreach (WE&O) Ad Hoc Task Group, and participation in the WMI Communications and Outreach Subgroup.
2. Support watershed awareness through classroom education programs by participating in the WE&O Schools Work Group, the Alviso Environmental Education Center (EEC) Work Group, the City’s Youth Watershed Education Team (YWET), and to the general public by promoting community-based involvement, such as the biannual creek cleanups conducted through the Creek Connections Action Group.

**Training and Outreach**

Other sections of this work plan contain elements related to training and outreach to specific target audiences. They can be found at ICID 4, IND 6, CON 7, NDC 2, PM 6, M 5, and CNAP-CB-1. For a list of Outreach Activities, see Attachment A: Outreach Activities Summary. Training that is specifically for municipal staff is listed as part of the Municipal Compliance section of the Work Plans.

**PI/P 1 - Public Awareness**

The City of San José will promote general citizen awareness regarding the functions of the storm drain system, pathways and sources of urban runoff pollution to the South Bay watershed, behaviors that adversely affect water quality, what a watershed is, and activities citizens can participate in to learn about and benefit the watershed.

#	Activities	Compliance Date	Responsible Party
A.	Identify, support and participate in appropriate community events to further general public awareness.		ESD
	1. Work with Program events work group, and WE&O ad hoc Task Group.	Ongoing	ESD, Program
B.	Support, and/or develop and implement school and youth education programs. Projects include:		
	1. Participate in WE&O Schools work group.	Ongoing	ESD, Program
	2. Participate in the Alviso Education Center work group.	Ongoing	ESD, Program
	3. Participate in City Education programs such as the Youth Watershed Education Team, Rangers in Schools, etc.	Ongoing	ESD

#	Activities	Compliance Date	Responsible Party
C.	Give presentations upon request that focus on storm water messages to elementary through college grade levels, <b>neighborhood groups, etc.</b>	As Needed	ESD
D.	Participate in WMI Outreach, and coordinate WMI outreach with Watershed Watch and Program efforts.	Ongoing	ESD, WMI, Program
	1. Participate in Watershed Watch campaign.	Ongoing	ESD, Program

**PI/P 2 - Targeted Outreach**

The City of San José will develop and implement targeted residential outreach and education campaigns, based on identification of up to two high priority pollutants, to effectively reduce pollutant-causing behaviors and promote Best Management Practices.

#	Activities	Compliance Date	Responsible Party
A.	Identify General Residential practices contributing to stormwater pollution. Identify reasonable alternatives to pollutant causing behavior.		ESD, Program
	1. Review surveys and applicable reports	Ongoing	ESD
	2. Review 945-3000 hotline calls information	Ongoing	ESD
	3. Meet with inspectors to discuss <b>and document</b> residential outreach needs	Ongoing	ESD
	4. Prepare report identifying residential outreach needs and tasks	Annually	ESD
B.	Identify ICID practices and target audience(s) contributing to pollution.		ESD
	1. Review ICID reports	Ongoing	ESD
	2. Review 945-3000 hotline calls information	Ongoing	ESD
	3. Meet with ICID inspectors to discuss <b>and document</b> outreach needs	Ongoing	ESD
	4. Prepare report identifying ICID outreach needs and tasks	Annually	ESD-Marcom
C.	Promote selected residential and ICID messages through regional activity (e.g. Program PIP, BASMAA PIP, BAPPG Spanish radio ad messages, Media Relations PSAs)		
	1. Report on targeted residential and ICID outreach activity	Annually	ESD-Marcom
	2. Participate in the Program’s Pesticide and Mercury ad hoc task groups.	Ongoing	ESD, Program



**PI/P 3 - Citizen Involvement Programs**

The City of San José will support and/or develop and implement citizen involvement programs designed to increase citizen understanding and appreciation of the South Bay watershed.

#	Activities	Compliance Date	Responsible Party
A.	Support and/or develop involvement opportunities for San Jose residents 1. Participate in creek clean-ups on a bi-annual basis through in-kind staff support for the Creek Connections Action Group. <ul style="list-style-type: none"> <li>• Fall creek cleanup</li> <li>• Spring creek Cleanup</li> </ul>	Coastal Cleanup Day, Q1 FY 03-04  National Rivers Day, Q4 FY 03-04	ESD, PRNS  ESD, PRNS  ESD, PRNS
B	Promote WMI's Public Participation Opportunities list. 1. Report on actions promoting Public Participation Opportunities list.	Annually	ESD

**PI/P 4 - Outreach Evaluation**

The City of San José will develop and implement evaluation and feedback mechanism(s) to determine the effectiveness of outreach and education campaigns and evaluate changes in citizen awareness and understanding.

#	Activities	Compliance Date	Responsible Party
A.	Implement selected evaluation tools. 1. Work with Program, WMI, and Watershed Watch AHTG to Plan for Program's Watershed watch campaign follow-up Survey 2. Report on survey and evaluation activity during the report period	Triennially- FY <del>03-04</del> <b>06-07</b>  Annually	<b>ESD</b>  <b>ESD, Program</b>  <b>ESD</b>
B.	Annually review, modify and report on outreach plans based on effectiveness results. 1. Produce written report on effectiveness of outreach activities conducted in prior fiscal year.	Annually	<b>ESD</b>  <b>ESD</b>

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## Municipal Compliance

During FY 2002-2003, the City began developing new policies regarding Integrated Pest Management and mercury containing product use and disposal. These efforts were added to the City of San Jose URMP work plan in the Pesticide Management (PM) and Mercury (M) sections. For this reason, those items have been deleted from this section.

Municipal training continues to be a key element for most program elements. Specific program elements that include municipal training activities include ICID 3, IND 5, NDC 9, CON 2, CON 6, CON 8, PSR 2, PSR 3, PSR 6, SDO 3, SDO 4, PM 4, and WUO&M 3. For a list of planned training activities, see Attachment B: Municipal Training Schedule.

### Municipal Training

Municipal Training is a critical function of the City's NPDES Permit. Municipal compliance is dependent on the level and quality of the training provided.

#	Activities	Compliance Date	Responsible Party
A.	Identify training needs.	Annually	ESD-UR
B.	Develop curricula.	<del>Done 6/02</del> As Needed	ESD-UR
C.	Conduct training	Annually	ESD-UR

### Municipal Facilities Assessment and Compliance

Municipal facilities are required to comply with storm water regulations. Efforts to reduce contaminated discharges from City facilities must be similar to those required of private businesses. While many elements for permit compliance are in place, the City requires a systematic approach to City facilities compliance at the level of effort required in the URMP.

#	Activities	Compliance Date	Responsible Party
A.	Conduct Corp Yard assessments and inspections.	Annually	ESD-UR, GS, DOT
	<b>1. Conduct Citywide meeting to discuss Hazardous Material, Safety, and Storm water issues for City corporation yards (up to two times per year).</b>	<b>Annually</b>	<b>GS, ESD, DOT, Fire, Police</b>
B.	Municipal Facilities SWPPPs.	Annually	ESD-UR, GS, DOT
C.	<del>Develop and formalize policies to develop proper disposal of mercury containing products.</del> Superseded by M Work Plan	Deleted FY 03-04	

**Integrated Pest Management**

Assist with development of performance standards for integrated pest management for municipal use and comply with requirements developed.

#	Activities	Compliance Date	Responsible Party
A.	Assist with performance standard development.	Done FY 01-02	
B.	<del>Coordinate implementation of performance standards.</del> Superseded by PM Work Plan.	Deleted FY 03-04	
C.	<del>Create and update existing policies and ordinances.</del> Superseded by PM Work Plan.	Deleted FY 03-04	

## Copper / Nickel Action Plans

### CNAP Work Plan

This element is implemented pursuant to provisions C.9.a and b of the stormwater permit. Activities in the copper and nickel action plans are attributed largely to the South Bay POTWs and to SCVURPPP as the responsible entities. Some activities, however, require specific actions by the SCVURPPP co-permittees or specified municipalities. Summarized here are activities pursuant to implementation of the baseline actions included in the Copper and Nickel Action Plans. These are in addition to those undertaken by SCVURPPP as a program. A complete update on implementation of the Action Plans can be found in the SCVURPPP Annual Report.

#### CB-1 - Vehicle Washing Operations

#	Activities	Target Date	Responsible Party
A.	Have member of San Jose team trained to lead mobile cleaners certification seminar.	Done FY 02-03	
B.	Support Program in hosting mobile cleaners certification seminar.	<del>6/30/04</del> Done FY 03-04 Next FY 05-06	ESD
	<b>1. Promote list of certified mobile cleaning service providers.</b>	Ongoing	ESD
C.	Distribute coupons in support of Program partnership with Western Car Wash Association.	<del>9/30/03</del> Done FY 03-04 Continue in FY 04-05 pending implementation by Program.	ESD
D.	Develop and distribute charity car wash outreach material.	Done FY 02-03	

#### CB-3 - Industrial Discharges

#	Activities	Target Date	Responsible Party
A.	Work with Program to discuss results of CSJ outreach efforts and potentially develop improvements to the IND Performance Standard.	6/30/04	ESD
B.	Publish BMP info on copper from roof vents.	Done FY 01-02	ESD
C.	Continue Distribution of info regarding copper from roof vents. Develop BMP for distribution and mail to permitted industries.	3/31/04	ESD
	<b>1. Follow up with pertinent dischargers to evaluate need for additional effort.</b>	6/30/05	ESD-WE
D.	Continue NOI Filers project.	Ongoing	ESD-WE

**CB-6 - Reducing Traffic Congestion**

#	Activities	Target Date	Responsible Party
A.	Summarize San Jose efforts that address traffic congestion management.	6/30/04	ESD PBCE Planning

**CB-8 - Watershed Assessments and New Development**

#	Activities	Target Date	Responsible Party
A.	See NDC section for details on San Jose implementation of C.3 permit provisions.		

**CB-11 - Street Sweeping and Storm System O&M**

#	Activities	Target Date	Responsible Party
A.	Track quantitative data on the tons of material removed and disposed of and other relevant street sweeping program data.	6/30/04 <b>Annually</b>	ESD-IWM DOT

**CB-12 - Pools and Spas**

#	Activities	Target Date	Responsible Party
A.	Work with SCVURPPP to develop outreach material directed at pool owners.	Done FY 02-03	
B.	Work with SCVURPPP to develop and implement distribution plan for the pool materials.	6/30/04	ESD
C.	Distribute outreach materials at events, public counters, and post on City website.	6/30/04 <b>Ongoing</b>	ESD

**CB-21 - Architectural Use of Copper**

#	Activities	Target Date	Responsible Party
A.	Continue to discourage architectural use of copper during Planning application review.	Ongoing	PBCE-Planning
B.	Continue to monitor progress of San Jose Green Building program to identify opportunities for discouraging architectural use of copper.	Ongoing	PBCE-Planning ESD-UR

**NB-1 – Discharges from Construction sites**

#	Activities	Target Date	Responsible Party
A.	See NDC and CON program elements for activities that address erosion control.	Ongoing	

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# Trash

## TRA Work Plan

**This program element has been added for FY 04-05 and is being implemented in support of the Program's Trash Work Plan dated March 1, 2003.** The City's strategy is to inventory and evaluate current trash management practices and to maximize or tailor the most effective ones for ongoing implementation. The City's activities will focus on assistance with the development of an evaluation strategy, implementation of trash evaluations, and the implementation or refinement of trash management practices.

### TRA 1 - Inventory, Document and Evaluate Trash Management Practices

#	Activities	Target Date	Responsible Party
A.	Complete Program survey of existing trash management practices.	Done FY 03-04	ESD

### TRA 2 - Document and Map Known Trash Problem Areas

#	Activities	Target Date	Responsible Party
A.	Identify data sources and information showing the location of known trash problem areas (e.g., trash complaints/ incidents and eradication efforts).	Done FY 03-04	ESD, GS, PRNS
B.	Compile trash problem location data/information and submit to Program for conversion to coordinates for GIS mapping.	Done FY 03-04	ESD

### TRA 3 - Conduct Trash Evaluations

#	Activities	Target Date	Responsible Party
A.	Work with Program to select trash evaluation methodology.	4/30/04	ESD
B.	Assist Program with planning and organizing of training workshop for municipal staff.	5/31/04	ESD
C.	Participate in the Training Workshop.	5/31/04	ESD
D.	Identify which entities will conduct trash evaluations (e.g. municipal staff, volunteer groups, etc.).		
E.	Conduct trash evaluations and submit to Program staff.		
	1. Coyote Watershed	12/31/04	ESD
	2. Remaining San Jose locations	FY 05-06	ESD

**TRA 4 - Develop Standardized Documentation and Reporting Format**

#	Activities	Target Date	Responsible Party
A.	Work with Program to develop a reporting format to document trash management activities in Annual Reports.	6/30/04	ESD

**TRA 5 - Document and Analyze Evaluation Results; Identify and Prioritize Trash Problem Areas**

#	Activities	Target Date	Responsible Party
A.	Assist Program staff with the documentation and analysis of trash evaluation results.	12/31/04	ESD
B.	Identify high priority trash areas using trash evaluation results.		
	1. Coyote Watershed	12/31/04	ESD
	2. Remaining San Jose locations	FY 05-06	ESD

**TRA 6 - Identify and Implement Trash Management Practices**

#	Activities	Target Date	Responsible Party
A.	Identify reasonable trash management practices to address high priority areas (in TRA 7B).	Ongoing (Start 7/31/04)	ESD, PRNS, GS
B.	Begin implementation or refinement of trash management practices at high priority areas to the maximum extent practicable.	Ongoing (Start 1/31/05)	ESD, PRNS, GS
C.	Document and report implementation of trash management actions.	7/31/05	ESD

**TRA 7 - Review and Update Performance Standards Relevant to Trash Management**

#	Activities	Target Date	Responsible Party
A.	Assist with the review and update of existing standards that address BMPs or control measures relevant to trash management.	4/30/05	ESD

## Permit Reapplication

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**This work plan element has been added for FY 04-05.**

Provision C.14 of the permit stipulates that the current permit expires on February 21, 2006 and that the Dischargers must file for reapplication not later than 360 prior to that, or by February 26, 2005.

### Permit Reapplication Preparation

#	Activities	Target Date	Responsible Party
A.	Compile all changes to URMP as part of reapplication for next permit. (C.2.b)	9/1/04	ESD
B.	Participate in permit development and negotiation processes.	Beginning 02/01/05	ESD

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## Attachment A: Outreach Activities Summary

#	Activity	Outreach Type	Work Plan Reference	Implementation Date	Evaluation Mechanism
○ = General Outreach, ◎ = Targeted Outreach, ✎ = Citizen Involvement, ✎ = Education					
1.	<b>Storm Drain Stenciling</b> San Jose Conservation Corps to stencil approximately 5,000 storm drain inlets throughout the City with the appropriate neighborhood creek name and 945-3000 hotline number.	○		FY 04-05	
2.	<b>Regional partnerships</b> Participate in BAPPG Spanish Radio campaign, BASMAA/BACWA Media Relations campaign, Clean Estuary Partnership, etc.	○	PI/P 2.C	FY 04-05	
3.	<b>Classic Car Wash Promotion (PROGRAM)</b> Support Watershed Watch campaign's Classic Car Wash promotion	○	CNAP, CB-1	TBD	♦ Materials distributed
4.	<b>Program Event Support</b> As needed, staff Watershed Watch Booth and/or provide outreach materials to select Watershed Watch Campaign events.	○	PIP 1.A.	As needed	♦ Materials distributed
5.	<b>Website Revisions</b> Complete revisions to the Watershed Protection website	○		FY 04-05	
6.	<b>BMP Reprints</b> Reprint selected Outreach materials as needed	○		FY 04-05	
7.	<b>Print "Preventing Storm Drain Pollution" BMP in two languages</b> Print run for Spanish and Vietnamese language versions of this Brochure	◎: Commercial		FY 04-05	
8.	<b>Home and Garden Show(s)</b> Attend and distribute information	◎: Residential	PI/P 1.A. PM 6.A.	Spring 05	♦ # People talked to ♦ Materials distributed
9.	<b>Industrial Users Academy</b> Give stormwater, Pollution prevention and GIASP compliance information to industries permitted to the Water Pollution Control Plant	◎: Plant-permitted Industries	IND 6.A. PI/P 1.A.	FY 04-05	♦ Participant surveys
10.	<b>Outreach to Development Community</b> PW & ESD staffs to conduct training on erosion and sediment control for private developers of	◎: Developers	CON 7.C. NDC 2	FY 04-05	♦ Participant surveys

#	Activity	Outreach Type	Work Plan Reference	Implementation Date	Evaluation Mechanism
<p>○ = General Outreach, ◎ = Targeted Outreach, ✎ = Citizen Involvement, ✎ = Education</p>					
	type 2 projects. PBCE Planning and PW also conduct roundtable meetings with developers where information regarding stormwater requirements is shared.				
11.	<b>IPM Store Partnership (PROGRAM)</b> Create & provide fact sheets & materials to pesticide retailers to facilitate point-of-purchase outreach to support IPM Store Partnership Program. There are currently nine stores in San Jose participating in the IPM store partnership.	◎	PM 6.D.	FY 04-05 dates TBD	
12.	<b>Vehicle Maintenance Outreach</b> Investigate partnering with existing City outreach on Traffic Safety to carry vehicle maintenance messages	◎	ICID 4	FY 04-05	
13.	<b>Mercury Outreach</b> Investigate opportunities to include mercury messages in the City's residential newsletter, participation in the Home Show events, and support the County's Universal Waste Take-back Pilot Program	◎	M5 PIP 2.C.	FY 04-05	
14.	<b>Coastal Clean-up Day</b> Creek Clean-up event coordinated with County-wide effort	✎	PI/P 3.A.	Fall 04	◆ Participant surveys ◆ Amount picked up
15.	<b>National Rivers Clean-up Day</b> Creek Clean-up event coordinated with County-wide effort	✎	PI/P 3.A.	Spring 05	◆ Participant surveys ◆ Amount picked up
16.	<b>Requests for Brochures</b> Distribute outreach materials upon request	✎	PI/P 1.A.	FY 04-05	
17.	<b>Wacky Watersheds Workshops</b> Present South Bay Water Connections curriculum to middle school educators within San Jose/Santa Clara Water Pollution Control Plant service area. The educators will also receive a tour of the Don Edwards San Francisco Bay National Wildlife Refuge.	✎	PI/P 1.B.	TBD	◆ Participant surveys ◆ Follow-up call of attendees
18.	<b>Water Awareness Program</b> Also called Rangers in Schools. Presentations focusing on Pollution Prevention. <i>It's Wet It's Wild It's Water!</i> Curriculum distributed to teachers.	✎	PI/P 1.B. PI/P 1.C.	FY 04-05	◆ Survey of teachers ◆ Survey of students
19.	<b>Slow the Flow</b> Grant to Don Edwards Alviso Environmental Education Center to host 9 different types of events: special events, interpretive programs, teacher orientation, field trips, in-class presentations, outreach presentations, workshops, special visits and interpretive displays.	✎		FY 04-05	◆ Done by Grantee

#	Activity	Outreach Type	Work Plan Reference	Implementation Date	Evaluation Mechanism
○ = General Outreach, ◎ = Targeted Outreach, ✎ = Citizen Involvement, ✎ = Education					
20.	<b>Youth Watershed Education Grants</b> Grant program for educators	✎		FY 04-05	♦ Audit of projects
21.	<b>High School Activities</b> Select and pilot feasible approaches to high school education	✎		FY 04-05	
22.	<b>Additional ZunZun Presentations</b> Additional 50 ZunZun presentations in San Jose, contingent on Grant approval	✎	PI/P 1.B.	FY 04-05	
23.	<b>IPM Outreach</b> Prepare IPM stories and press releases for local media. Investigate opportunities to include IPM messages in the City's outreach to businesses.	◎	PM 6.B. PM 6.E.	FY 04-05	

## Attachment B: Municipal Training Schedule

PS ID #	TOPIC	SPONSORED OR HELD BY	DEPT/DIVISION/SECTION ATTENDING	# SESSIONS	TENTATIVE FY 04/05 SCHEDULE
ICID 3A & 3B	Construction Inspection Training	ESD Watershed Enforcement	ESD Watershed Enforcement	1	10/04
ICID 3A & 3B	Annual Training for IC/ID Inspectors	ESD Watershed Enforcement	ESD Watershed Enforcement	1	06/04
IND 5C	Training for IND Inspectors	ESD Watershed Enforcement	ESD Watershed Enforcement	1	06/04
CON 2C	Wet Weather Construction Site Preparation & Inspection	DPW, ESD	PW	2	9/04
CON 6C	Construction Site Planning and Management For Water Quality Protection	SCVURPPP & Regional Board	PW, ESD, PB&CE, PRNS		9/04
CON 6C	SOPs for inspections during wet and dry season to include procedures for erosion control plan review inspection process	DPW, ESD	PW Inspections, PBCE Building Inspectors		9/04
CON 7C	Erosion & Sediment Control Training for Type 2 Private Development Projects	DPW & ESD	Private Developers, PW, ESD		9/04
CON 8A	Erosion Control Information To Be Included In Contract Language For Capital Improvement Projects Training For PW Construction Project Management	PW & ESD	PW		TBD
NDC 9A, 9B, & 9D	NPDES C.3 Training	Various	PBCE, PW, RDA, ESD		
PSR 2A	DOT Contract Manager Training	DOT, ESD	DOT Managers from: Transportation, Planning, Traffic Signals, Traffic Ops, Sanitary & Sewers	2	10/04
PSR 3C & 3E	Storm Water Pollution Prevention Training	DOT, ESD	DOT Crews	12	05/04
PSR 6C	Stormwater Pollution Prevention Training – Rural Public Works	PRNS, ESD	PRNS	2	03/04
SDO 3A	DOT Contract Manager Training	DOT, ESD	DOT Managers from: Transportation,	2	10/04



PS ID #	TOPIC	SPONSORED OR HELD BY	DEPT/DIVISION/SECTION ATTENDING	# SESSIONS	TENTATIVE FY 04/05 SCHEDULE
			Planning, Traffic Signals, Traffic Ops, Sanitary & Sewers		
SDO 4B & 4C	Storm Water Pollution Prevention Training	DOT, ESD	DOT Crews	12	05/04
PM 4A	Worker Safety training per DPR requirements	GS, ESD, Target Specialty Products	DOT, GS, PRNS, ESD	1	12/04
PM 4B	Training on IPM Policy & Techniques.	GS, ESD	DOT, GS, PRNS, ESD	1	12/04
WUO&M 3B	Water Utility Operation & Maintenance Discharge Training	ESD (Muni Water)	Muni Water Operations & Maintenance Crews		12/04

## Glossary

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<b>AHTG</b>	Ad Hoc Task Group
<b>BMP</b>	Best Management Practices
<b>CAO</b>	City Attorney's Office
<b>CEP</b>	Clean Estuary Partnership
<b>DOT</b>	Department of Transportation
<b>ESD</b>	Environmental Services Department
<b>ESD-MarComm</b>	Marketing & Communication Section
<b>ESD-Muni</b>	City of San Jose Municipal Water System
<b>ESD-UR</b>	Urban Runoff Section
<b>ESD-WE</b>	Watershed Enforcement Section
<b>GS</b>	General Services Department
<b>HHW</b>	Household Hazardous Waste
<b>PBCE</b>	Department of Planning, Building and Code Enforcement
<b>POTW</b>	Publicly Owned Treatment Works
<b>PRNS</b>	Department of Parks, Recreation and Neighborhood Services
<b>PW</b>	Public Works Department
<b>PW-AE</b>	Architectural Engineering Division of PW
<b>PW-ECS</b>	Engineering and Construction Services Division of PW
<b>PW-PRF</b>	Parks and Recreational Facilities Division of PW
<b>PW-TDS</b>	Transportation & Development Services of PW
<b>RDA</b>	Redevelopment Agency
<b>RWQCB</b>	Regional Water Quality Control Board
<b>SCVURPPP or Program</b>	Santa Clara Valley Urban Runoff Pollution Prevention Program
<b>SOP</b>	Standard Operating Procedure
<b>SWPPP</b>	Storm Water Pollution Prevention Program
<b>TMDL</b>	Total Maximum Daily Load
<b>URMP</b>	Urban Runoff Management Plan
<b>WMI</b>	Watershed Management Initiative