



# **SECTION 1**

## **PROGRAM CONTINUOUS IMPROVEMENT TASKS**

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# 1. PROGRAM CONTINUOUS IMPROVEMENT WORK PLAN

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## INTRODUCTION

The 2004 Urban Runoff Management Plan (URMP)<sup>1</sup> commits the Program and Co-permittees to a process of continuous improvement. The concept of continuous improvement acknowledges that the definition of “maximum extent practicable” evolves over time. Through continuous improvement, the Program will continue to develop and implement reasonable control measures to help advance the goal of achieving water quality objectives in South San Francisco Bay.

The continuous improvement process is described on pages 37-39 of the Program URMP. As shown in Figure 2 of the 2004 URMP, areas for continuous improvement are identified through the Program and Co-permittees’ participation in the Santa Clara Basin Watershed Management Initiative (SCBWMI) and the Program and Co-permittees’ annual evaluations and annual reports.

Water Board staff and representatives of interested parties (including CLEAN South Bay) review the Program and Co-permittee annual reports and work plans, and participate in Co-permittee performance review meetings<sup>2</sup>. Comments from these reviews and meetings help identify specific Co-permittee and Program continuous improvement (CI) tasks.

## FY 06-07 CONTINUOUS IMPROVEMENT WORK PLAN

### FY 06-07 Program Continuous Improvement Items

Program and Co-permittee staff will work with Water Board staff (through the Municipal Regional Permit Steering Committee) on developing a Municipal Regional Permit to address the Program’s permit re-issuance.

### On-Going Continuous Improvement Items

There were no new continuous improvement items identified for FY 05-06. There are a few remaining continuous improvement tasks from previous years, and their status and updated schedules are provided in Table 1-1.

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<sup>1</sup> In accordance with Permit Provision C.2.b., the Program submitted the 2004 URMP (dated September 1, 2004) to the Water Board on September 1, 2004. In accordance with Permit Provision C.14., the 2004 URMP was resubmitted to the Water Board on February 24, 2005 as part of the *Report of Waste Discharge* (NPDES Permit Application for Re-issuance of SCVURPPP NPDES Permit).

<sup>2</sup> During April 26-28, 2005, Tetra Tech, Inc. provided an independent third party evaluation of certain elements of the Cities of Milpitas, Palo Alto, Santa Clara and Santa Clara County stormwater programs. The following elements were included within the evaluation: ICID/IND inspections and enforcement, municipal maintenance, new development/redevelopment and construction inspection. On October 3, 2005, Water Board staff issued the following : 1) Notice of Violation letter to the City of Milpitas entitled *Failure to Implement an Adequate Construction Inspection Program Pursuant to the NPDES Permit No. CAS029718* and 2) letter to the Cities of Milpitas, Palo Alto, Santa Clara and Santa Clara County entitled *FY 2004-05 Evaluation of Milpitas, Palo Alto, Santa Clara, and Santa Clara County Programs*. Each City provided a response to the letters by November 3, 2005. Santa Clara County was not required to respond.

**Table 1-1  
Status of Ongoing Program Continuous Improvement (CI) Tasks**

<u>Tasks</u>	<u>Updated Schedule</u>	<u>Status<sup>1</sup></u>
<b><i>New Development and Redevelopment</i></b>		
1. Develop design guidance containing stormwater control opportunities for small road modifications.	June 2006	<b>Update</b> – The Program’s permit requirements were made consistent with other Bay Area permits, which exempt road reconstruction (within the same footprint) from C.3. However, the C3PO AHTG members have expressed interest in the development of stormwater control design guidance for small road and right-of-way modifications and other tight spaces.
<b><i>Program Management</i></b>		
1. Conduct a workshop for municipal staff based on the municipal training protocols being developed by an ad hoc task group. (Priority – Medium)	June 2006	<b>Update</b> – Five Power Point presentations have been developed on BMPs for corporation yards, storm drain O&M, road maintenance, pest management and mercury pollution prevention. Program staff will repackage each training protocol into smaller, focused modules. This approach will allow Co-permittees to train municipal staff on certain key municipal elements in shorter blocks on time (e.g., 15 minutes).
2. Consider developing, with the help of an ad hoc task group, a fact sheet addressing common construction BMP problems, like drain inlet protection and dewatering. (Priority – Medium)	June 2006	<b>Update</b> – Management Committee approved having the Program adapt an existing brochure on dewatering (created by Palo Alto, Mountain View and San Jose) for the other Co-permittees’ use. The C3PO AHTG confirmed its interest in this project at its September 26, 2005 meeting.
3. Look into providing storm water training to building officials through the Peninsula Chapter of Building Officials monthly training sessions. (Priority –Low)	June 2006	<b>Update</b> – This item is low priority, and was delayed due to Program staff’s focus on higher priority items. The C3PO AHTG confirmed its interest in this project at its September 26, 2005 meeting. Program staff will work with Co-permittee staff to investigate methods of outreach to building officials.

<sup>1</sup> Tasks reported as completed in the FY 03-04 Annual Report have been removed from the list.