



SECTION 8

NEW AND REDEVELOPMENT CONTROL MEASURES

8. NEW AND REDEVELOPMENT CONTROL MEASURES

INTRODUCTION

This section describes the Program's efforts during FY 04-05 to assist Co-permittees to control the impacts of development on stormwater quality and flow through the development project planning, review and approval process. Tasks related to construction inspection are described under Section 2, Co-permittee Guidance, and Section 2, Performance Standards.

BACKGROUND

On October 17, 2001, the Water Board adopted Order 01-119 which amended the Program's Permit Provision C.3. (New and Redevelopment Requirements) to contain significant new requirements. These requirements include:

- Numeric design standards for sizing stormwater treatment controls;
- Limits on increases in peak stormwater discharge rates and/or durations from new or redevelopment sites that may result in increased potential for erosion or other adverse impacts in creeks;
- Requirements for operation and maintenance of stormwater controls;
- Requirements for site design and source control measures;
- Definition of a minimum project size, based on amount of impervious surface created, for which the design standards, control measures, peak flow limitations, and maintenance requirements apply;
- Requirements for changes to General Plans and environmental review processes to provide authority to implement the requirements;
- Reporting requirements; and
- Schedule for implementation.

In addition, Permit Provision C.3. requires the Program and Co-permittees to submit specific work plans for: 1) modifications to the development project review process (C.3.b.); 2) implementation of Group 1 requirements (C.3.c.); and 3) site design standards review and revision (C.3.j.). In response, the Program and Co-permittees submitted work plans for implementing all C.3. requirements to the Water Board on March 1, 2002 (as part of the Program's *FY 02-03 Work Plan, Volume II*). To guide this effort, Program staff prepared a separate document entitled *Guidance for Work Plan Tasks Related to Implementation of Permit Provision C.3. (New and Redevelopment Requirements), FY 01-02 and 02-03* (referred to herein as C.3. Work Plan Guidance). This guidance identifies proposed actions to meet the requirements of Provision C.3. and whether the actions will be implemented at the Program level, Co-permittee level or both. The Program and Co-permittee tasks for FY 04-05 (listed in the C.3. Work Plan Guidance) are the basis of this Annual Report section.

In February 2003, the Water Board adopted and/or amended the stormwater permits for the Contra Costa, Alameda, and San Mateo countywide stormwater programs with different requirements than those in the Program's permit. The Water Board Executive Officer stated the Board's intention to make all of the permits consistent, and as a result, extended the deadlines

for implementation of certain C.3. provisions¹. In addition, the Program submitted a letter to the Water Board on September 22, 2003 proposing an alternative Group 1 and Group 2 project definition consistent with the other stormwater programs' permits², which was accepted by the Water Board in a letter dated January 29, 2004³. On July 20, 2005, the Water Board adopted a Tentative Order⁴ (which amended portions of Provision C.3. in Order 01-119) to further conform the permit language to that of the other permits in the region, amend the Group 2 requirements to include a revised alternative Group 2 definition, and incorporate key provisions in the Hydromodification Management Plan (HMP) Report.

On October 15, 2003, Co-permittees began implementing the C.3. requirements for Group 1 projects (i.e., those projects that included creation or replacement of one acre or more of impervious surface). During FY 04-05, Program efforts were focused on assistance to Co-permittees with C.3. implementation, completion of the HMP Report, negotiations with Water Board staff regarding key provisions of the HMP Report, and the revised alternative Group 2 definition.

IMPLEMENTATION OF FY 04-05 C.3. TASKS

Table 8-1 presents the status of the Program's new and redevelopment (C.3.) tasks scheduled for completion in FY 04-05. The table includes tasks assigned to the Program in the C.3. Work Plan Guidance submitted March 1, 2002, as outlined in the *FY 04-05 Work Plan*.

Highlights of accomplishments and evaluation of effectiveness of some of the key elements of the C.3. Work Plan are provided below.

Ad Hoc Task Group and Work Group Participation

In FY 01-02, the Program formed the C.3. Provision Oversight Ad Hoc Task Group (C3PO AHTG) to oversee, coordinate, and discuss Program guidance on implementation of C.3. tasks. During FY 04-05, the C3PO AHTG continued to meet approximately bimonthly. It has provided valuable assistance to Program staff in development of the C.3. implementation tools and continues to be a useful forum for discussion of experience with implementing the C.3. requirements.

A number of work groups were formed to work on specific issues under C.3. The list of AHTG and work group members, and the missions of each group, is provided in Section 2, Table 2-2. During FY 04-05, one work group (BMP O&M Verification Work Group) was active. HMP issues were addressed by the Executive Committee and Management Committee.

¹ Letter to Beau Goldie, SCVURPPP Management Committee Chair, from Loretta K. Barsamian, Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, Re: Extension of Specified Deadlines in Order 01-119, May 12, 2003.

² Letter to Loretta Barsamian, Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, from Beau Goldie, Chair, SCVURPPP Management Committee, Re: Revised Request for Regional Board Approval of an Alternative "Group 2 Project" Definition, September 22, 2003.

³ Letter to Beau Goldie, SCVURPPP Management Committee Chair, from Bruce Wolfe, Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, Re: Approval of the Proposed Alternate Group 2 Project Definition, January 29, 2004.

⁴ Order No. R2-2005-0035, NPDES Permit No. CAS029718, Amendment Revising Order No. 01-119 (Provision C.3., New and Redevelopment Requirements), July 20, 2005.

C.3. Workshops

During FY 04-05, the Program conducted one workshop to assist Co-permittees with implementation of Provision C.3.e., Operation and Maintenance of Treatment BMPs. The workshop, entitled *Conducting Stormwater Treatment BMP Maintenance and Inspections* was held on June 9, 2005 and attracted 116 participants. The workshop covered requirements for treatment BMP O&M verification programs; examples of cities' approaches to conducting inspection programs; lessons learned about BMP maintenance from the Caltrans BMP Retrofit Pilot Program and other agencies; mosquito management; and porous pavement design and maintenance. The workshop also featured exhibits for eight stormwater control measure vendors.

The agenda and evaluation summary for the workshop are presented in Section 2, Appendix A-5.

Guidance for Treatment BMP Operation and Maintenance Verification Programs

Provision C.3.e of the Program's NPDES permit requires each Co-permittee to implement a stormwater treatment BMP Operation and Maintenance (O&M) Verification Program. To address Provision C.3.e, the BMP O & M Verification Work Group was formed (by the C3PO AHTG) to develop guidance for implementing an O&M verification program. The Work Group consists of Program staff and representatives from the following jurisdictions: Cupertino, Los Gatos, Mountain View, Milpitas, Palo Alto, San Jose, Santa Clara Valley Water District and Sunnyvale.

In FY 02-03 and FY 03-04, Program staff developed (and the Work Group reviewed) a total of eight guidance documents to assist Co-permittees in implementing a BMP O&M Verification Program. Information from these documents was included in Chapter VI of the *C.3. Stormwater Handbook* (May 2004). The memoranda and the Handbook are available at www.scvurppp.org.

During FY 04-05, the Program provided assistance to Co-permittees that were setting up verification programs; planned and conducted a training workshop on O&M verification; and continued work on defining database and reporting requirements. On May 23, 2005, the C3PO AHTG met with Water Board staff to discuss the reporting requirements described in Permit Provisions C.3.e and C.3.n. At the meeting, Water Board staff requested that the Program propose an approach that would satisfy the reporting requirements described in Permit Provision C.3.e. Working with the BMP O&M Verification Work Group, the Program developed an approach to use standardized data fields to track treatment BMPs and relevant inspection results. To ensure consistent data collection among Co-permittees, Program staff and the Work Group are developing a data collection form which includes the standardized fields. During FY 05-06, the Work Group and C3PO AHTG will finalize the data collection form and determine what inspection data should be included in future Annual Reports. Co-permittees will be expected to use the form or a form with similar standardized fields while conducting BMP O&M verification inspections.

Hydromodification Management Plan

Background

Provision C.3.f. requires the Co-permittees to manage increases in runoff peak flows and volumes from Group 1 development projects through the implementation of a Hydromodification Management Plan (HMP). The HMP Draft Work Plan was developed by the Program's consultant, Geosyntec, in consultation with Program staff and the SCVWD, and submitted to the Water Board on March 1, 2002. A response to Water Board staff comments received May 14, 2002 and a revised HMP Work Plan were submitted to the Water Board on September 13, 2002 (see www.scvurppp.org).

In FY 02-03, the GeoSyntec consultant team was expanded to include Philip Williams & Associates and Balance Hydrologics, Inc. The addition of these consultants brought expanded expertise in geomorphology, stream function, hydrologic/hydraulic modeling and local knowledge to the team. The consultant team also recruited a panel of experts to provide outside technical review of HMP Work Plan products. They included Brian Bledsoe of Colorado State University, Thomas Dunne of University of California at Santa Barbara and Matt Kondolf of University of California at Berkeley. The Program formed an HMP Work Group to start reviewing products developed as part of the Plan. The consultant team developed a watershed assessment methodology and applied it to the first test subwatershed, Lower Silver-Thompson Creek (part of Coyote Creek watershed).

In FY 03-04, completed HMP tasks included the assessment of two additional watersheds, the Ross Creek Subwatershed (representing the Guadalupe River watershed) and the San Tomas Aquino Creek Subwatershed (representing the characteristics of the western watersheds). The assessment methodology consists of four elements: 1) problem area and reach characterization, 2) geomorphic assessment, 3) hydrologic modeling, and 4) stability assessment. The results of the assessments indicated that the methodology works in watersheds with different characteristics and that the watersheds studied are not significantly different to warrant separate hydromodification standards, criteria, and thresholds. Differences between watersheds are accounted for in the assessment methodology.

The Program and its consultant team also completed six technical memoranda describing the technical analyses performed to address key issues which include the range of storm events to be considered for HMP criteria; effectiveness of volume control, discrete storm hydrograph matching, and flow duration control techniques for mitigating hydromodification techniques; and examples of flow duration basin sizing for local projects. Two other draft memoranda on guidelines for exempt areas and development of hydromodification standards were not finalized but instead incorporated into Chapter 4 of the HMP Report.

The list of technical memoranda completed to date includes:

- TM #1 — HMP Assessment Methodology (completed in October 2002)
- TM #2 — Exempt Areas (draft incorporated into Chapter 4 of HMP Report)
- TM #3 — HMP Standards and Criteria (draft incorporated into Chapter 4 of HMP Report)
- TM #4 — Evaluation of the Range of Storms for HMP Performance Criteria
- TM #5 — Evaluation of Volume Control Effectiveness
- TM #6 — Volume Control Sizing Example and Cost Analysis
- TM #7 — Flow Duration Control Example
- TM #8 — Sizing Flow-Duration Controls for a Small Development Project in San Jose

Copies of the technical memoranda are available within Appendix C of the HMP Report provided on the Program’s website (www.scvurppp.org).

During FY 03-04, the Program completed four HMP interim and draft reports:

- The *HMP Draft Interim Report, Assessment of the Lower Silver-Thompson Creek Subwatershed*, July 30, 2003. The report focuses on the application of a field investigation and assessment methodology for understanding the impacts of hydromodification on one watershed in Santa Clara Valley
- *Hydromodification Management Plan (Update)*, permit provision C.3.f., submitted January 15, 2004.⁵ The update presented a progress report on the HMP, including a description of the products completed which constituted substantial compliance with Provision C.3.f.iv., and a plan and schedule for completion of the HMP Report.
- *Interim Progress Report on SCVURPPP HMP*, permit provision C.3.f., submitted April 1, 2004. A compilation of five technical memoranda on analyses needed for completion of the HMP was submitted to the RWQCB Executive Officer.
- *Hydromodification Management Plan (Public Review Draft)*, permit provision C.3.f, submitted July 9, 2004. This draft report was released for public and peer review.

FY 04-05 Accomplishments

After the release of the *Hydromodification Management Plan (Public Review Draft)*, the Program conducted a series of public meetings (during July and August 2004) to get input from the development community (developers and engineering consulting firms) and other interested parties on the *Public Review Draft*. These meetings also served to update and get input from the Bay Area Stormwater Management Agencies Association (BASMAA) and Santa Clara Basin Watershed Management Initiative (SCBWMI) members on the HMP. Comments received were incorporated into a *Hydromodification Management Plan Report (Revised Public Review Draft)* released on November 4, 2004. After the release of the *Hydromodification Management Plan Report (Revised Public Review Draft)*, one additional public meeting was held.

A summary of the groups receiving presentations on HMP development and report is presented below:

Groups Receiving Presentations/Briefings	Date	Attendees⁶
<i>HMP Development</i>	2002-2004	
<ul style="list-style-type: none"> • SCBWMI’s Watershed Assessment Subgroup and Flood Management Subgroup 	Nov. 18, 2002	Municipal agency staff, SCVWD, CLEAN South Bay, GCRCD, engineering consultants, Water Board staff

⁵Letter to Bruce Wolfe, Executive Officer, California Regional Water Quality Control Board, San Francisco Bay Region, from David Chesterman and Randolph Shipes, Chair and Vice Chair, SCVURPPP Management Committee, Re: Hydromodification Management Plan, January 15, 2004.

⁶ Legend: GCRCD = Guadalupe Coyote Resource Conservation District, SCVWD = Santa Clara Valley Water District, HBANC = Home Builders Association of Northern California.

Groups Receiving Presentations/Briefings	Date	Attendees⁶
<ul style="list-style-type: none"> BASMAA's New Development Committee 	Dec. 5, 2002	Municipal agency staff, Bay area stormwater program representatives, engineering consultants, Water Board staff
<ul style="list-style-type: none"> SCVURPPP's C3 Provision Oversight Ad Hoc Task Group 	April 26, 2004	Municipal agency staff, SCVWD and Water Board staff
<ul style="list-style-type: none"> SCVURPPP's Management Committee 	April 29, 2004	Municipal agency staff, Management Committee reps
<i>HMP Report, Public Review Draft</i>	June 29, 2004	
<ul style="list-style-type: none"> SCBWMI's Watershed Assessment and Monitoring Subgroup and Flood Management Subgroup 	July 30, 2004	Municipal agency staff, SCVWD, League of Women Voters, GCRCD, engineering consultants, Water Board staff
<ul style="list-style-type: none"> BASMAA's New Development Committee 	Aug. 5, 2004	Municipal agency staff, Bay area stormwater program representatives, engineering consultants, Water Board staff
<ul style="list-style-type: none"> City of San Jose Developer Roundtable Meeting 	Aug. 5, 2004	City of San Jose staff, developers, engineering consultants, Water Board staff
<ul style="list-style-type: none"> City of San Jose Developer Roundtable Meeting 	Aug. 12, 2004	City of San Jose staff, developers, engineering consultants, environmental consultants, HBANC, Water Board staff
<i>HMP Report, Revised Public Review Draft</i>	Nov. 4, 2004	
<ul style="list-style-type: none"> SCVURPPP's C3 Provision Oversight Ad Hoc Task Group 	Nov. 22, 2004	Municipal agency staff, SCVWD, SCVURPPP Management Committee reps
<ul style="list-style-type: none"> SCBWMI's Watershed Assessment and Monitoring Subgroup and Flood Management Subgroup 	Jan. 18, 2005	Municipal agency staff, GCRCD, Stevens Creek Watershed Council representative

The Final *Hydromodification Management Plan Report* was completed in March 2005 and approved by the Management Committee for submittal (to the Water Board) on April 21, 2005. It addressed comments provided by Water Board staff on the November 2004 *Hydromodification Management Plan Report (Revised Public Review Draft)*. Following submittal of the Final *Hydromodification Management Plan Report*, Water Board staff issued a Tentative Order that adopted the key provisions of the Report. The Tentative Order was approved by the Water Board on July 20, 2005. The Order requires Co-permittees to implement

the HMP provisions within three months of adoption (by October 20, 2005). The Report and its appendices are available on the Program's website (www.scvurppp.org).

Early Implementation of the HMP

City of San Jose, Water District and Program staff have been involved in a pilot project for implementation of the HMP in the Evergreen area (eastern edge of San Jose). Currently, the City of San Jose is developing a Smart Growth Strategy for Evergreen, which addresses the future development of several non-contiguous properties. The development of these properties comprises more than 500 acres and could include approximately 6,000 homes. The Evergreen Smart Growth Strategy provides a unique opportunity to address stormwater and HMP issues early in the planning stages of this community development. During FY 04-05, San Jose, Water District and Program staff continued to meet with the team of consultants representing the property owners and assisted them in evaluating how to meet the HMP requirements for the proposed developments.

San Jose staff is also addressing stormwater and HMP issues in the development of the Coyote Valley Specific Plan. The Land Use Plan Concept for Coyote Valley presented to City Council in January 2005 includes a lake that will be used for flood control and flow control purposes and other site design measures that will help to reduce increases in flow from the development.

Next Steps

The HMP Report will continue to be improved through lessons learned from implementation experiences and review of approaches proposed by other Bay Area stormwater programs. Chapter 7 of the Final HMP Report, HMP Implementation Guidance, describes the anticipated next steps towards addressing remaining implementation issues, refining the guidance and coordinating with other Bay Area programs and Water Board staff in development of a consistent, regional approach. A list and schedule of next steps is provided in Table 8-2.

Other Tasks

Other tasks that Program staff accomplished during FY 04-05 include the following:

- Program staff gave the following presentations on the permit requirements for new and redevelopment projects and other Program elements:
 - "Understanding Potential Barriers to Better Site Design for Water Quality Protection", Putting the LID on Stormwater Management Conference, College Park, Maryland, September 21, 2004.
 - "Urban Runoff Permit Issues: C.3. and the Regional Permit", Municipal Public Works Officials of Santa Clara County, February 10, 2005.
 - "Integrating Water Quality Protection and Development Project Design", American Public Works Association Workshop, May 12, 2005.
 - "Introduction to HMP Requirements – Santa Clara Valley's Experience", San Mateo Countywide Stormwater Pollution Prevention Program 2005 New Development Workshop, May 24, 2005.
- Program staff reported on the Program's C.3. implementation progress at BASMAA New Development Committee meetings.

- Program staff also chaired the BASMAA BMP Sizing Tools Work Group, a group overseeing a Task of Regional Benefit to develop an automated BMP sizing tool, and reviewed Phase 1 products from the consultant. The Program is helping to fund the project and overseeing the consultant contract.

Evaluation of Effectiveness

The process for working with the Co-permittees to prepare for C.3. has worked well. As mentioned above, the C3PO AHTG and its work groups have provided valuable assistance to Program staff in development of the C.3. implementation tools. In addition, the C3PO AHTG has also been a useful forum for discussion of development review processes used by the various Co-permittees and sharing of ideas for implementing C.3. requirements.

During FY 04-05, a significant amount of Program and Co-permittee staff time was expended working with Water Board staff on two Tentative Orders (one of which was adopted) and responding to Water Board staff comments. While the ultimate result was positive, this shifting of resources prevented the Program from making more progress on C.3. and HMP implementation tasks.

The evaluation summary from the BMP O&M Inspection workshop is provided in Appendix A-5. Based on the evaluations, the workshop was successful overall and the expectations of most attendees were met. Comments on the evaluation forms will be used in planning subsequent workshops. The Management Committee has requested a follow-up workshop targeted to maintenance staff with more detail on the actual inspection process.

Program staff will continue to work with the Co-permittees and Water Board staff to evaluate the C.3. planning and implementation process and products during future C3PO AHTG meetings and C.3. workshops.

**Table 8-1
Status of FY 04-05 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
<u>C.3.c. Requirements for Group 1 and Group 2 Projects</u>		
c.8. Conduct analysis of alternative minimum project size and prepare proposal for submittal to Water Board.	Completed 3/05	<p>Completed – On September 22, 2003, the Program submitted a letter to the Water Board on September 22, 2003 proposing an alternative Group 1 and Group 2 project definition consistent with the other stormwater programs’ permits. This request was accepted by the Water Board in a letter dated January 29, 2004. Program staff have collected impervious surface data for development projects from Co-permittees (during the period April 2002 to August 2003) and conducted an analysis of data trends. Program staff provided the data (and analysis) to the Water Board in a memorandum entitled <i>Data Analysis of Development Patterns for Group 2 Projects</i> (dated March 30, 2005). The memorandum was provided to the Water Board following the submittal of a letter with a second alternative Group 2 definition proposal (dated March 18, 2005).</p> <p>On April 18, 2005, Water Board staff requested additional data. Co-permittees responded by providing additional data (from their FY 03-04 Annual Reports) on impervious surface areas of development projects. Water Board staff then drafted a Tentative Order with the Program’s proposed alternative Group 2 definition. On July 20, 2005, the Water Board adopted the Tentative Order amending Provision C.3.</p>
c.9. Update guidance manual and performance standards for Group 2 projects as needed.	12/05	<p>In Progress – The <i>C.3. Stormwater Handbook</i> and Planning Procedures Performance Standard currently cover Group 1 and 2 projects. The documents will be updated to include the most recent alternative Group 2 definition and the key provisions of the Hydromodification Management Plan (HMP), per the adopted Tentative Order (Order R2-2005-0035). This was not done in FY 04-05 since negotiations with Water Board staff were ongoing.</p> <p><i>Guidance on Group 2 implementation will assist Co-permittee compliance with regulatory requirements in C.3.c. and C.3.d.</i></p>

**Table 8-1, continued
Status of FY 04-05 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
C.3.e. Operation and Maintenance of Treatment BMPs		
e.6. Report on the Co-permittee's treatment BMPs O&M verification program in each annual report, including organizational structure, evaluation of effectiveness, and planned improvement to the program. Include a list or summary of treatment BMPs inspected during the year, inspection results, and any required follow-up and correction.	Annually, beginning with FY 03-04 Annual Report	<p>Completed/Ongoing – Co-permittees began reporting on their progress with this task in the <i>FY 03-04 Annual Report</i>. Since the C.3. implementation start date was October 15, 2003, Co-permittees have few, if any, BMP verification inspections to report because Group 1 projects proposed in FY 03-04 are either not yet constructed or only recently constructed. Program staff has provided guidance for compilation of data and will continue to assist Co-permittees with this task.</p> <p><i>Guidance on O&M annual reporting assisted Co-permittee compliance with regulatory requirements in C.3.e. and C.3.n.</i></p>
C.3.f. Hydromodification Management Plan		
f.1. Complete the final HMP and submit to the Water Board.	Completed 4/05	<p>Completed – The Program completed the Public Review Draft of the HMP Report in June 2004, and conducted a public review process during July and August 2004. After incorporation of public comments, the Program produced a Revised Public Review Draft of the HMP Report in November 2004. Both drafts were submitted to the Water Board and posted on the Program's website. Following further discussions with and response to comments from Water Board staff, the Program completed the Final HMP Report in April 2005 and submitted it to the Water Board on May 4, 2005. On July 20, 2005, the Water Board adopted a Tentative Order approving key provisions of the HMP Report (Order R2-2005-0035).</p>

**Table 8-1, continued
Status of FY 04-05 C.3. Implementation Tasks**

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
f.2. Develop guidance to the Co-permittees on implementation of the HMP as part of requirements for Group 1 projects that may cause increased erosion or other related impacts.	Report completed 4/05; additional guidance 12/05	<p>Completed/Ongoing – Guidance on HMP implementation is provided within Chapter 7 of the HMP Report. Additional guidance, including fact sheets for training Co-permittee staff and outreach to the development community, will be developed in FY 05-06. The <i>C.3. Stormwater Handbook</i> will be updated to include the HMP requirements and implementation guidance (see Task c.9.).</p> <p><i>Guidance on HMP implementation will assist Co-permittee compliance with regulatory requirements in C.3.f.</i></p>
f.3. Upon adoption by the Water Board, begin implementation of HMP requirements for Group 1 projects that may cause increased erosion or other related impacts. Before adoption, encourage early implementation of likely elements of the HMP where possible.	10/05	<p>In Progress –Order R2-2005-0035 (adopted July 20, 2005) requires implementation of HMP requirements by October 20, 2005. In order to implement the HMP, Co-permittees are currently amending their ordinances and policies. San Jose has begun early implementation by requiring flow controls in the conceptual planning phases of large development projects. Program staff will assist with guidance on implementation (see Task f.2.).</p>
f.4. Provide assistance and input as needed to District study to evaluate potential regional treatment and/or flow control projects.	As needed	<p>Completed/Ongoing – Program staff is continuing to review District products and participate in discussions with District and San Jose staffs and developers regarding requirements for the Evergreen Specific Plan Area, Coyote Valley Specific Plan and other major development projects (see description in Sec. 8).</p>
<u>C.3.g. Waiver and Compensatory Mitigation Program</u>		
g.3 Assist Co-permittees to track and report information on waivers granted, including project name, location, type, percent impervious surface, reasons for and terms of waiver, and the alternative benefit project and completion date.	Each Annual Report	<p>Completed/Ongoing – Program staff developed a reporting form for projects granted a waiver and alternative compliance, which is included in Attachment 6 to the Planning Procedures Performance Standards and Attachment VII-3, Part 3 of the <i>C.3. Stormwater Handbook</i>.</p> <p><i>Guidance on waiver reporting assisted Co-permittee compliance with regulatory requirements in C.3.g.</i></p>
<u>C.3.j. Site Design Measures Guidance and Standards Development</u>		

Table 8-1, continued
Status of FY 04-05 C.3. Implementation Tasks

<u>Task</u>	<u>Updated Schedule</u>	<u>Status</u>
<p>j.2. Assist Co-permittees to prepare and submit reports summarizing the status of review, revision, and implementation of local site design guidance and standards, as part of their annual reports.</p>	<p>Guidance completed 7/03; Site Design Analyses submitted 9/03; Progress report on revised standards due 9/04 in AR; continue in each AR.</p>	<p>Completed – Program staff worked with the Site Design Work Group and the C3PO AHTG to define an approach to this task and to prepare guidance, using the Development Policies Comparison Project worksheets as a starting point for Co-permittees to conduct the analysis of design standards. Co-permittee worksheets were combined into one Program submittal and delivered to the Water Board on September 15, 2003. During spring 2004, Program prepared guidance on follow-up reporting for the <i>FY 03-04 Annual Report</i>. <i>Guidance on site design standards review assisted Co-permittee compliance with regulatory requirements in C.3.j.</i></p>
<p><u>C.3.n. Reporting Requirements</u></p>		
<p>n.1. Provide information described in Table 1 of Provision C.3. in annual reports (Program to provide guidance for each annual report).</p>	<p>Initial Guidance: 6/04 Begin with FY 01-02 AR; continue annually</p>	<p>Completed/Ongoing – Each June, Co-permittees are provides guidance (within the Program’s Annual Report preparation guidance memorandum) on C.3. reporting. Reporting requirements are cross-referenced within Table 1 of Provision C.3. and any comments/direction provided by Water Board staff. <i>Guidance on annual reporting assisted Co-permittee compliance with regulatory requirements in C.3.n.</i></p>
<p>n.2. Assist Co-permittees to collect information and summarize types of pesticide reduction measures required for development projects, and the percentage of projects for which pesticide reduction measures were required.</p>	<p>Guidance: 6/04 Begin with FY 01-02 AR; continue annually</p>	<p>Completed/Ongoing – Program staff provided guidance for reporting within the memorandum entitled <i>FY 03-04 Annual Report Preparation Guidance</i>-dated June 11, 2004. (See Task n.1). This is reinforced in subsequent annual report guidance memoranda provided each June. Data can be recorded on C.3. Summary Data Forms and reported using Group 1 and 2 reporting forms (PPPS and Attachment VII-3 of <i>C.3. Stormwater Handbook</i>.) <i>Guidance assisted Co-permittee compliance with regulatory requirements in C.3.n. and C.9.d.ii.</i></p>

TABLE 8-2
SCVURPPP HMP - Summary of Next Steps¹
(From Chapter 7 of April 2005 HMP Report – *tasks in italics added*)

Task	Time Frame	Anticipated Start Date	Anticipated Completion Date
1. Develop the following: a. A funding mechanism such that projects can utilize in-stream control options b. A methodology for determining developer contributions based on the stream changes expected to result from changes in project runoff conditions.	Medium	12/04 11/04	6/06 6/06
2. Work with City/County planning and public works departments and the Water District to determine the timing and method of notifying District staff during the development review process about HMP projects that may need in-stream controls, in a manner that does not unreasonably prolong the review process. Further, look at ways to improve method to provide early communication on group 1 projects reporting.	Short	11/04	10/05
3. Facilitate review of District's MDL analysis, both by the Co-permittees and the Expert Panel, and work with the Management Committee to determine the need to integrate some or all of the MDL analyses into implementation of the HMP.	Short	5/05	12/05
4. Conduct additional studies of implementation of site design, integrated management practices, and/or basins at example development sites in Santa Clara Valley.	Long	7/05	6/06
5. <i>BAHM Development Project</i> <i>Regional</i>	<i>Short</i>	6/05	6/06
(Conducted over 2 FYs) <i>Local Calibration</i>	<i>Long</i>		05-06& 06-07

¹ All dates depend on availability of resources and cooperation/collaboration of numerous staff from different agencies and may change because of circumstances beyond the control of the Program. The Program periodically updates the Management Committee regarding schedule changes and will transmit updates schedules to Water Board staff.

TABLE 8-2
SCVURPPP HMP - Summary of Next Steps
 (From Chapter 7 of April 2005 HMP Report – *tasks in italics added*)

Task	Time Frame	Anticipated Start Date	Anticipated Completion Date
6. During implementation of the HMP, obtain feedback/suggestions for further refinement and implementation guidance	Medium	As needed, begin 1/05	As needed/Ongoing
7. Coordinate with other Bay Area stormwater programs to work toward a consistent approach for the Bay Area.	Medium	Ongoing	Ongoing
8. Coordinate additional Co-permittee, Bay Area stormwater program, and Water Board staff review process and progress meetings, including: a. The development of a schedule for Bay Area-wide HMP implementation pursuant to requirements to be adopted by the Water Board in the upcoming regional municipal urban runoff permit. b. <i>Public outreach – HMP updates, workshop</i> c. <i>HMP Work Group Meetings</i>	Medium <i>Short</i> <i>Short</i>	1/05 12/04 9/05	12/05 12/05 Ongoing
9. Collect data on the implementation of the HMP at small sites for a period of two years after the start of implementation, and plan to re-evaluate the small site size threshold and approach at that time. <i>Conduct and document reevaluation.</i>	Long	6/05	10/07 10/07
10. Make additional refinements per: 1) lessons learned from implementation efforts based on the draft HMP; 2) the need for consistency with HMPs being developed by other Bay Area stormwater programs; and 3) development community, Co-permittee, and Water Board feedback.	Long	10/05	Report in ARs beginning with FY 05-06 AR