<u>Major</u> Modifications Proposed by Water Board Staff that are Currently Under Discussion by Work Groups

September 2020

C.3 – New & Redevelopment

Topic	Proposed Modification
Regulated Projects	• Reduce threshold to 5,000 SF (Year 3) • Single family homes – 10,000 SF • Roads – 1 acre new/reworked IA (Year 3)
Special Projects	• Phase out Category C by Year 3
Asset Management	• Required elements to include in AM system (plan by Year 3 and implement by end of permit term)
GI Implementation	• Minimum requirement to implement non-regulated public retrofit project(s) (no. of projects or no. of greened acres)

C.8 – Water Quality Monitoring

Topic	Proposed Modification
Creek Status Monitoring (CSM) - Management Questions	New Management Questions regarding flow reductions and urban stormwater pollutants, however - CSM does not include flow monitoring - CSM addresses overall creek health and does not include Bay-focused pollutants of concern (POCs), which are addressed separately
POC Monitoring - Overall	No more than 25% of POC samples can be used to satisfy multiple monitoring categories
POC Monitoring – PCBs and Hg Information Needs	Increased focus on collection of information for developing models and evaluating BMPs and decreased focus on collection of information for source area (property) identification
POC Monitoring – Constituents of Emerging Concern (CECs)	CEC monitoring requirements may not be solely addressed through current level of RMP participation

C.10 – Trash Load Reduction (Part 1)

Topic	Proposed Modification
Compliance Dates	• 90% reduction (non-enforceable) performance guideline to be met by July 2022 • 100% reduction mandatory compliance threshold by July 2025
Source Control Credits	• No credit for existing actions • Credit for new actions only towards 90% guideline; only associated with trash remaining to be managed • Elimination of all credits at 100% threshold
Receiving Water Monitoring	• TBD
Trash Hot Spot Cleanups/Assessments	• Eliminate provision

C.10 – Trash Load Reduction (Part 2)

Topic	Proposed Modification
Creek/Shoreline Cleanups & Direct Discharge Offsets	• Offsets ongoing until 100% threshold. Elimination of all credits at 100% threshold.
Long-Term Plan & Practicability Evaluation	• If Permittees do not expect to achieve 100% by July 2025, submit revised long-term plan and propose schedule • Conduct evaluation of trash controls to determine where it is impracticable to achieve compliance
Other Items	• Curb Inlet Screen Performance Standard • Trash reduction benefits of LID

C.11/C.12 – Mercury and PCBs Controls

Topic	Proposed Modification
Load Reduction Performance Criteria	Move to Programmatic Approach with accountability metrics
Source Property Investigations/ Abatement	Area to be investigated during MRP 3
Treatment Controls/Enhanced O&M/Trash Capture	Implementation of control measures in areas with elevated concentrations
PCBs in Building Demolition	Effectiveness evaluation
PCBs in Infrastructure	Bridge project specification/implementation
Mercury Load Avoidance	Tracking and reporting similar to MRP 1

Homeless Encampment Management (New Provision)

Topic	Proposed Modification
Interim Implementation Practices	ID population numbers, locations, and water-quality related needs
	Provide sanitary services (clean water and sewage disposal) and trash collection services; Implement clean urban surfaces practices
	Report on programmatic efforts (e.g., internal/external coordination, longer-term efforts to provide housing, etc.)
Regional Coordination Tasks	Review existing data and public health impacts associated with homelessness to: 1) recognize sources; 2) means of discharge, and 3) develop info to prioritize corrective actions
	Identify and complete WQ monitoring to inform usefulness of censuses and illicit discharge reporting or similar information as a surrogate; and sufficient to inform value of identified implementation practices
	Participate in regional coordination effort(s) on homelessness
Continuous Improvement	Use the information generated to review and update Interim Implementation Practices

Implementation Cost Reporting (New Provision)

Topic	Proposed Modification
Objectives	• Set objectives and broad expectations in MRP for tracking and reporting implementation costs
Tracking/Reporting Framework and Methods	• Permittees develop and submit a proposed Cost Reporting Framework/Methods early in permit term • Preference for regional consistency
Tracking and Reporting Implementation Costs	• Using framework/methods, Permittees begin tracking and reporting costs mid/latter half of permit term on annual basis