Santa Clara Valley Water District Municipal Regional Stormwater Permit Annual Report FY 2024-2025

Valley Water

Clean Water • Healthy Environment • Flood Protection

Cover Photos

Top left:
Valley Water trash boom installed at Lower Silver Creek, capturing trash and debris before they enter downstream waterways.

Top right:
Education Outreach Program showcasing the Enviroscape model to students, which shows water pollution and prevention activities.

Bottom left:
Community volunteers participating in National River Cleanup Day 2025 along Coyote Creek, removing trash and debris to improve creek health.

Bottom right:
Well-maintained Best Management Practice (BMP) consisting of a plastic sheet and wattle covering a material stockpile, effectively preventing erosion and runoff.

September 30, 2025

Ms. Eileen White
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Santa Clara Valley Water District
FY 2024-2025 Annual Report

Dear Ms. White:

This letter and Annual Report with attachments is submitted by Santa Clara Valley Water District pursuant to Permit Provision C.22.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2022-0018, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of activities conducted during FY 2024-2025 and consists of the following:

A. Certification Statement
B. Annual Report Form
    - Table of Contents
    - Completed Annual Report Form Sections
C. Appendix
    - Table of Contents
    - Appendices

Valley Water is reporting on the MRP 3.0 provisions that apply to this agency. As a flood protection, water supply, and stewardship agency, not all the MRP 3.0 permit provisions apply to Valley Water due to lack of land use authority, and therefore it may appear that information is not present. Valley Water has indicated which sections of the Annual Report do not apply.

Stormwater Program Highlights and Accomplishments

Valley Water remains active in its capacity as the Chair of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) Management Committee. Valley Water also continues to actively participate in the Ad Hoc Task Groups (AHTG) that support implementation of the various permit provisions. In addition, Valley Water participates directly in various Bay Area Municipal Stormwater Collaborative (BAMSC) workgroups and CASQA subgroups, including serving as co-chair for the Stormwater Capture and Use subcommittee. Elements of the voter-approved Safe, Clean Water and Natural Flood Protection Program (Safe, Clean Water) incorporate water pollution prevention and pollution reduction activities. Specifically, Priority B (Reduce Toxins, Hazards and Contaminants in Our Waterways). In addition, Valley Water actively promotes green stormwater infrastructure, including updating the Valley Water Board of Directors on Stormwater Resource Plans and project development, coordinating presentations to Board Advisory Committees, coordinating with internal and external partners to evaluate potential projects for stormwater capture and use, and promoting its public landscape rebate programs for installation of rain gardens, rain barrels, and other low impact development measures.

Section C.2 Municipal Operations

During FY 24-25 Valley Water continued implementation of storm drain inspection and cleaning at its facilities and corporation yards. Formal annual stormwater inspections were completed at all Valley Water corporation yards in August and September 2024, and most best management practices (BMPs) were implemented and maintained according to site-specific stormwater pollution prevention plans (SWPPPs), while a few required action items to follow up and make corrections before the wet season. Due to staffing issues, equipment availability, and prioritization of other critical projects, corrective actions could not be completed before the wet season at seven sites. However, one action was not completed before the first significant rain event in November 2024. A landslide from an adjacent property delivered a large amount of sediment onto Valley Water property, and the cleanup took significant time and resources. Temporary inlet protection measures were not in place before the first rain. Staff developed a plan with the site operator to ensure temporary BMPs are deployed if a similar issue arises in the future. Training occurred this year to increase awareness of Corporation Yard SWPPPs, BMPs, and spill/discharge response plan and contact. While staffing and resources continue to be a challenge, these trainings and reminders of annual inspections are anticipated to help with timely corrections of deficiencies for FY 25-26.

Section C.3 New and Redevelopment

Valley Water has one regulated project that is currently under construction with two bioretention areas. Additionally, a public joint project between City of San José and Valley Water was evaluated for GSI. The Future Emergency Interim Housing Project is located on Valley Water property at Cherry Avenue and is being constructed and maintained by the City of San José through a Collaborative Use Agreement.

Section C.5 Illicit Discharge Detection and Elimination

Emergency Response Program – Pollution Prevention Hotline
Valley Water addresses illicit connection/illegal dumping (IC/ID) incidents effectively through its hazardous materials Emergency Response (ER) Program. Valley Water received and responded to a total of 223 emergency response reports throughout Santa Clara County during FY 24-25, 52 more than in FY 23-24. Of these, 171 were within the jurisdiction of the SFBRWQCB, 44 were discharge events that reached a waterway, and 28[1] required a field response by a team member or members for general investigation, source identification, multi-agency coordination, and clean up or evidence collection. Valley Water is one of the few Santa Clara County Permittees that have 24-hour availability to conduct storm and stream water pollution investigations. Valley Water staff will, as needed, investigate, and collect evidence at a site that can later be transferred to the appropriate jurisdictional authority on the next business day. Jurisdictional authority could reside with a co-permittee, state, or federal agency. Valley Water responded within target field response time 100 percent of the time for all incidents requiring urgent field response.

Water Resource Protection Ordinance Code Enforcement Program
To protect Valley Water owned public lands, Valley Water regulates use of the agency's property through the Water Resources Protection Ordinance. The Water Resources Protection Manual, which includes measures to protect the riparian corridor, is utilized for case development. The Community Projects Review Unit's Code Enforcement Program processed 207 cases in FY 24-25. Thirty-five percent were encroachment violations. Encroachments (unauthorized private use of Valley Water's property) often occur on creekside or near-creekside lands. They can have negative impacts on the stream environment due to

[1] In FY 2022-2023 and FY 2023-2024 Annual Reports, the incorrect field response data column was used. In FY23, 39 reports (37 within Region 2) required field response, compared to the 62 (51 within Region 2) reported; and in FY24, 34 reports (29 within Region 2) required field response, instead of 115 (91 within Region 2) reported. These numbers are more consistent with previous reporting in prior years and in this current FY.

increased erosion from irrigation and overland drainage, the potential for the introduction of pesticides into the creek, planting of non-native and invasive plant species in the riparian corridor, grading of creek banks, and dumping. Valley Water has been protecting creekside public lands by remediating encroachments for over 40 years. Approximately 21 percent of the cases were for illegal dumping on Valley Water property, which is predominately creekside. Dumped items consisted of trash, soil, vegetation, pet waste, construction/ fencing materials, cooking grease and cigarette butts. Drainage issues included broken sprinklers/ irrigation systems. Outfalls are another common drainage issue, where drainage is directed through a pipe. These pipes are usually discharging water collected in residents' yards during the rainy season but have been used to discharge pool water as well.

Water Waste Program
Valley Water started the Water Waste Program in 2014, effectively reducing urban non-stormwater discharges. Water Waste reports are received from the public through an online submission tool (Access Valley Water), the Water Wise Hotline (408-630-2000), and via email through WaterWise@valleywater.org. These reports are dispatched to the water waste team, who contact the responsible party, or reports are referred to the property's water retailer, to ensure they are aware of the issue(s) that may be contributing to water waste. Letters are mailed to the property owner outlining the reported water waste and highlighting Valley Water rebate programs, free services, and resources that could assist in resolving the issue(s). Inspections may be conducted depending on the severity of the reported water waste. Throughout FY 24-25, the water waste team followed an educational approach for all water waste reports, in accordance with Valley Water Ordinance No. 23-02. Valley Water continued to spread the message regarding the ban on irrigating non-functional turf at commercial, industrial, and institutional properties. In FY 24-25, all 353 water waste reports were responded to within 24 business-hours and ultimately resolved in a timely manner based on the nature of the report. There was a decline in water waste reports compared to FY 23-24, which was expected with the end of the most recent drought.

Section C.6 Construction Site Controls

A Senior Engineer, experienced and knowledgeable in stormwater regulatory compliance, continued to work directly on Valley Water's construction related environmental compliance program. The Senior Engineer worked in an advisory capacity for the capital projects' stormwater design and construction personnel and reviewed the Monthly Environmental Compliance Inspection Reports to ensure regulatory compliance for Valley Water's capital projects. In FY 24-25, stormwater inspections were performed by Valley Water's Construction Inspectors and Contractor inspectors on Capital projects as required by Valley Water's Enforcement Response Plan (ERP). Capital Project Contractors' inspectors continued to perform monthly site-specific inspections to ensure appropriate BMP implementation and enforcement throughout the year in both wet and dry seasons. Valley Water's construction-related stormwater compliance program is continually improving by making adjustments to ensure that problems are addressed in a timely manner. Proposed improvements included, reminding contractors during weekly site construction meetings to ensure all BMP-related materials and personnel are available to implement corrective actions in a timely manner before the next rain event and no longer than 10 business days after deficiencies or BMP failures are found, and provide as-needed stormwater compliance training to the Construction Inspection Services Unit to discuss BMP monitoring and ensure that timely escalation of enforcement continues. Valley Water's construction and environmental inspection staff continued to work closely and diligently to ensure that all construction work was performed in accordance with the State Construction General Permit and the MRP. Valley Water participates in the SCVURPPP Construction AHTG which meets regularly to discuss challenges, compliance, and best management practices.

Section C.7 Public Information and Outreach

Valley Water serves a community of nearly 1.9 million countywide and has excellent outreach programs to many sectors of the community. Key elements include:

- A popular Education Outreach Program (EO)
- A Youth Commission Board Advisory Committee
- A growing Adopt-A-Creek Program and creek cleanup events supporting citizen participation
- Attendance at community events targeting the general public
- A Grant Program that provides funding to several programs that include community engagement and public outreach components, such as conducting trash cleanup events, implementing docent-led walks, and creating interpretive displays
- Flood Awareness Guide and Creekwise Mailer, which include stormwater pollution prevention messages
- A spring and summer conservation outreach campaign: “Bring Your Yard to Life!” uses paid digital and social media advertisements to promote adopting water-efficient landscapes and participating in the Landscape Rebate Program that incentivizes rain gardens, rain barrels, and cisterns, a Graywater Rebate Program, and Water Wise Outdoor Survey Program.

Valley Water’s website continues to provide updates to the community, including stormwater pollution prevention messages. Our on-line maintenance request form (Access Valley Water) empowers citizens to report dumping or waterway-related problems and allows them to send messages to the appropriate watershed staff. The site also includes a link to the SCVURPPP website, where other stormwater pollution prevention program materials can be found. Valley Water uses several methods to conduct outreach, including newspaper, social media (e.g., Facebook, Instagram, and Nextdoor), website, blogs, in-class and virtual presentations, STEAM after school programs, library programs, educational tours, community events and workshops. The variety of outreach methods ensures that many Santa Clara Valley population segments are being reached, including residents, businesses, students, and people from other locations.

The Valley Water EO Program continued to serve school-aged children through in-person classroom lessons, school assemblies, field trips and tours, and summer programs. EO programming integrates messages and priorities of other Valley Water program areas. Programs are designed to teach students in grades TK-12 about water conservation, flood preparedness, and environmental stewardship. The EO Program also collaborated with local environmental education agencies and youth- serving organizations to increase the number of students exposed to water education. EO provides a hard copy of “You Are the Solution to Water Pollution” brochure to all educators who receive programming. Valley Water’s Youth Commission, a 21-member board advisory committee, with three members representing each of Valley Water’s seven districts, met every quarter during FY 24-25. The goal of the commission is to assist Valley Water’s Board of Directors with “public policy, education, outreach, and all matters impacting the Santa Clara County youth and the water district” and “to foster greater involvement of youth in local government to inspire and develop future public policy leaders and professionals with an awareness of issues and activities relating to water supply, conservation flood protection and stream stewardship.” Youth Commissioners have been asked to help publicize as well as participate in Valley Water cleanup efforts such as National River Cleanup Day, Coastal Cleanup Day and the Adopt-A-Creek program. Please visit the Learning Center for a more information about Education Outreach Programs and Events. – https://www.valleywater.org/learning-center/water-education-programs-and-events
Valley Water provides significant support for several citizen involvement events. The Santa Clara County cleanup efforts for National River Cleanup Day and Coastal Cleanup Day are coordinated by the Creek Connections Action Group (CCAG). As the Chair of the CCAG, Valley Water provides meeting support, graphic services, cleanup supplies, and site-coordinator training. On the day of the events, Valley Water provides phone staffing, logistical support, and reports results to the California Coastal Commission on Coastal Cleanup Day. After these events, Valley Water created and distributed outreach materials that highlight the cleanup effort. During FY 24-25, Coastal Cleanup Day included 50 organized group cleanup sites where 953 volunteers removed approximately 32,874 pounds of trash along nearly 55.8 miles of

waterways and natural areas in Santa Clara County. During FY 24-25, National River Cleanup Day included 42 organized group cleanup sites where 778 volunteers removed approximately 17,499 pounds of trash along nearly 71.5 miles of waterways and natural areas in Santa Clara County.

Valley Water also coordinates the year-round Adopt-A-Creek Program, that assists community members with creek access permits, provides resources on best practices for creek cleanups, offers cleanup supplies, and organizes trash collection services following citizen-led creek cleanups.

Valley Water also administers a grant program which includes citizen involvement pollution prevention and education grants (Projects F9 in the Safe, Clean Water program). For information on the grant program, please see the Safe Clean, Water annual report, which will be posted to https://www.valleywater.org/safe-clean-water-and-natural-flood-protection-program/safe-clean-water-program-archive.

Section C.8 Water Quality Monitoring

Most monitoring activities required in the stormwater permit are implemented through the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP). Valley Water participates directly in SCVURPPP's Monitoring and Pollutants of Concern AHTG and monitoring projects; reviewing and commenting on plans and reports; facilitating access to monitoring locations; and auditing field monitoring efforts. Staff also participates directly in the BAMSC Monitoring and Pollutants of Concern Committee, and some activities of the Regional Monitoring Program's Sources, Pathways, and Loadings Workgroup.

Section C.9 Pesticide Toxicity Controls

Valley Water uses pesticides as one of the tools for pest management on its properties and facilities. Most pesticide use on Valley Water owned properties is herbicides for vegetation control. In all cases, pesticide products are used only after an assessment has been made regarding environmental, economic, and public health aspects of each of the alternatives, in accordance with Valley Water's Integrated Pest Management (IPM) policy. Valley Water maintains a list of approved pesticides and ones that it will not use, which includes those identified in the MRP as threats to water quality. Only employees and contractors authorized and trained to apply pesticides can use them on Valley Water property. Valley Water staff verify contractor compliance with IPM practices through a multi-step approach. Hired landscaping and pest control contractors receive a copy of Valley Water's IPM policy, and a verbal reminder of IPM practices by Vegetation Field Operations Unit staff while working on-site as needed. Contractors can only apply pesticides from the list approved by the Valley Water Pesticide Review Team, and their job reports are reviewed to verify adherence to IPM practices. Additionally, contractors are required to notify Valley Water of any proposed changes to their application or eradication methods.

Section C.10 Trash Load Reduction

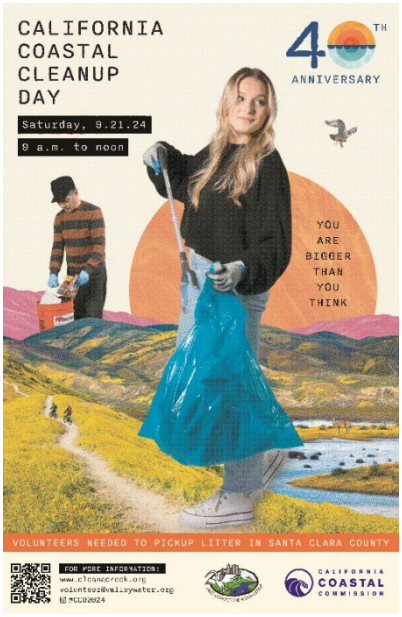
During FY 24-25, Valley Water continued operating trash booms as required by the MRP removing approximately 16 cubic yards of trash from four trash booms.

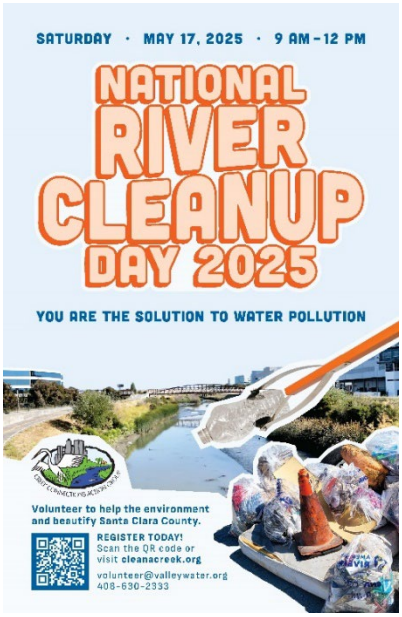
When public recreational paths, trails, or trailheads are established on Valley Water property, Valley Water enters into Joint Trail Agreements and Collaboration Action Plans (JTA/CAP) with the city that has local jurisdiction. Through these agreements, the cities assume responsibility for managing litter cans and controlling recreation-generated litter, while Valley Water addresses flow or encampment-related accumulations of trash and debris through priority projects described below.

While Valley Water does not operate and maintain an MS4, Valley Water continued various efforts to remove trash and debris from waterways in Santa Clara County. Valley Water conducts trash cleanup

primarily through the voter approved Safe, Clean Water Program Good Neighbor Programs, Priority Projects F5 and F6: Encampment Cleanups and Graffiti and Litter Removal and Public Art. The amounts and costs of trash removed by the Safe, Clean Water Program is summarized in Appendix D of the Safe, Clean Water FY 24-25 Annual Report at https://www.valleywater.org/safe-clean-water-and-natural-flood-protection-program/safe-clean-water-program-archive. The final draft of the Safe, Clean Water Annual Report will be published in October 2025. Preliminary FY 24-25 data for the Projects shows approximately 11,148 cubic yards of trash was removed from the four main watersheds across Santa Clara County (Guadalupe, Coyote, Lower Peninsula/West Valley, and Uvas-Llagas). Priority Project F5 (Encampment Cleanups) is also referenced in Provision C.17 as a best management practice.

Additionally, Valley Water continued to coordinate local California Coastal Cleanup Day and National River Cleanup Day activities in Santa Clara County. In this role, Valley Water coordinates and organizes countywide volunteers by identifying potential cleanup locations on a web-based system. Graphics advertising FY 24-25 Coastal Cleanup Day and National River Cleanup Day are shown below. Total trash removed is summarized above in Provision C.7. Additional information can be found at https://cleanacreek.org/.





Section C.11 Mercury Controls

Valley Water owns and operates three reservoirs (Almaden, Calero, and Guadalupe) and one lake (Lake Almaden) within the Guadalupe River Watershed that were included in the Clean Water Act (CWA) Section 303(d) list as impaired due to mercury in 1999. A Basin Plan amendment, adopted in 2008 by the SFBRWQCB, established new water quality objectives and Total Maximum Daily Loads (TMDLs) for mercury in the Guadalupe River Watershed. In the Guadalupe River Watershed Mercury TMDL (Guadalupe TMDL), it is recognized that Valley Water initiated voluntary applied studies in these water bodies prior to its adoption, and that the continuation of these studies is one means of compliance with regulations pursuant to the Guadalupe TMDL. Valley Water's mercury reduction activities are implemented under its Impaired Water Bodies Improvement Program (Priority B, Project B1) within the Safe, Clean Water and Natural Flood Protection Program.

The Guadalupe TMDL establishes a schedule for implementation for reservoir treatment controls and includes new water quality objectives for mercury in fish tissue and surface water to be achieved by meeting target reductions of seasonal maximum methylmercury concentrations in the above-mentioned waterbodies. As a treatment control, Valley Water has installed hypolimnetic oxygenation systems (HOS) at the above-mentioned reservoirs to suppress hypolimnetic methylmercury production. During FY 24-25, a HOS was only deployed at Calero and Almaden reservoirs. Operation of the systems increases the temperature of reservoir releases, and may also contribute to algae blooms, especially under drought or low water conditions. Hypolimnetic oxygenation has been effective for reducing hypolimnetic methyl mercury, but fish tissue concentrations remain high. For this reason and owing to the negative side-effects of hypolimnetic oxygenation using line diffusers, Valley Water has entered into cost sharing agreements with UC Merced, UC Davis, and UC Santa Cruz to explore alternative methods to reduce methylmercury in water and fish in collaboration with Regional Water Quality Control Board staff. For more information on this program and the biennial report submitted to the SFBRWQCB please see https://www.valleywater.org/project-updates/grants-and-environmental-protection/B1-impaired-water-bodies-improvement.

As part of its Stream Maintenance Program (SMP), Valley Water removes sediment from channels and creeks to reduce the potential for local flooding and to meet the requirements of the Federal Emergency Management Agency for flood protection. Valley Water analyzes the sediment for various constituents (including mercury, PCBs, and copper), to effectively plan for disposal or beneficial reuse and assist with determining the best management practices to avoid and minimize impacts to water quality and aquatic life during sediment removal and disposal. Sediment removal opportunistically removes mercury from watersheds. During FY 24-25 Valley Water removed over 16,314 cubic yards of sediment bearing 29.6 kg of mercury from watersheds flowing to San Francisco Bay.

Section C.15 Exempted and Conditionally Exempted Discharges

Efforts continue in the BAMSC Regional Firefighting Discharges Work Group to address recommended BMPs and SOPs to assist with discharges associated with firefighting emergencies. Refer to the SCVURPPP FY 24-25 Annual Report for a summary of the Work Group's progress to address recommended BMPs/SOPs in the Regional BMP Report due September 30, 2025. Valley Water provided input for the Regional Report through participation in the SCVURPPP IND/IDDE AHTG. Valley Water anticipates fully implementing recommended BMPs/SOPs through contracted staff hired to assist with containment and cleanup, with guidance provided in the Regional BMP Report. None of Valley Water facilities meet the Large Industrial Facility definition. Additionally, since Valley Water facilities are located within several other permittees' jurisdiction, Valley Water will refer to the respective municipality Fire Department's procedures and BMPs in the event of a firefighting emergency on Valley Water property. Valley Water has standing agreements with contractors who are capable to provide appropriate containment and cleanup response.

Valley Water has several water conservation programs, including residential and commercial conservation programs specifically aimed at reducing runoff and excess irrigation. The Landscape Rebate Program provides rebates for replacing high water-using landscapes with low water-using plants and permeable hardscapes, installing rainwater capture components (rain gardens, rain barrels, and cisterns) and for upgrading to efficient irrigation equipment. In FY 24-25, 766 rebates (over $2.2M) were issued through the Landscape Rebate program. Though the Landscape Rebate Program continues to experience a slight decline in application rate compared to the height of the drought in FY 21-22, rebates issued in FY 24-25 remain about twice as high as pre-drought participation. Other programs that help reduce runoff and excess irrigation include the Water Wise Outdoor Survey Program (207 surveys in FY 24-25), that provides free outdoor irrigation audits with a trained specialist for single family residents and businesses with small landscapes in Santa Clara County. The Large Landscape Program similarly provides free outdoor irrigation

audits with a trained specialist, but focuses on multi-family, commercial, industrial, and institutional properties with large landscapes and dedicated irrigation meters. Additionally, this program evaluates site water use and provides monthly usage reports through site-specific irrigation budgets and field surveys. In FY 24-25, eligibility for the Large Landscape Program expanded, bringing the total enrolled sites to approximately 4,800 and delivering over 57,000 monthly water-use reports. Valley Water also provides free hose nozzles and soil moisture meters and maintains several website pages on water waste reduction and water use efficiency. Valley Water works with water retailers to reduce water use and provides residential Do-It-Yourself water saving kits and videos for checking and repairing leaks.

Valley Water provides brochures on the use of drought-tolerant and native vegetation that requires less irrigation and pesticides. Valley Water launched our Water Conservation Webinar Series with presentations from industry experts on sustainable landscaping practices such as rainwater collection, irrigation controller programming, watershed approach to landscaping, and outdoor leak detection. As a part of Valley Water's Landscape Maintenance Consultation Program, which provides past Landscape Conversion Rebate participants with a free onsite consultation to help better maintain their new landscapes, Integrate Pest Management principals are highlighted to encourage less toxic pest control and weed abatement practices. The Landscape Maintenance Consultation Program visited 115 sites in FY 24-25. Valley Water's Nursery Outreach Program provides water-wise gardening literature and rebate information to nurseries and irrigation supply stores in the county. Valley Water is also one of the partners for the South Bay Green Gardens website, provides resources on sustainable landscaping and maintains a county-wide landscape events page.

Section C.17 Unhoused Discharges

Valley Water currently implements the following BMPs and programmatic efforts to address non-stormwater discharges from unsheltered populations located within our jurisdiction – encampment cleanups, portable toilets, trash collection and disposal, coordination with Santa Clara County Office of Supportive Housing, funding initiatives/coordination with non-profit organizations, physical barriers, encampment management policies, internal coordination, and responding to illicit discharges from encampments.

A map showing the count of unsheltered populations by census tracts in relation to existing streams, rivers, flood control channels, and other surface water bodies within Valley Water's jurisdiction is included in Appendix 17-1. Location of storm drain inlets was not included, due to the map scale. Valley Water owns very few storm drain inlets that are connected to the MS4. The map was developed using the point-in-time survey count data provided by the County of Santa Clara. Due to privacy and safety concerns, the County did not provide location data below the census tract level for this publicly available report. The maps aren't designed or meant to be an accurate real-time count of the total number of people experiencing homelessness and where they are, as the unhoused community frequently moves, shrinks as people connect to housing services, and grows if others fall into the homelessness experience. Valley Water collects general location information for encampments on Valley Water property outside of the MS4 during creek inspections to determine the condition of creeks for which Valley Water has responsibility. Encampments may also be identified to better assess accumulated trash and debris that needs to be removed to keep waterways clean through the Encampment Cleanup efforts under the F5 Good Neighbor Program. Additionally, encampments are reported by the public through Access Valley Water. This information is used internally and is not publicly available. The number of individuals and contacts at each encampment is not collected.

During FY 24-25, Valley Water continued to employ an encampment management strategy that leverages a variety of tools and approaches to better manage encampment sites and reduce the need for abatements until adequate housing is available. Under this strategy, Valley Water performs large scale trash cleanups throughout jurisdictional areas to prevent encampment-generated trash, debris, and hazardous materials

from polluting waterways. However, there still may be situations when Valley Water will need to safely relocate an encampment for issues related to facility access or safety. Valley Water also utilizes a Water Resources Encampment Risk Assessment tool as a transparent way to prioritize encampments for removal when other significant factors are present. Valley Water continues to facilitate the Environmental Creek Cleanup Committee (Formerly the Homeless Encampment Committee) to discuss homelessness and encampment issues, and to bring recommendations back to the Board. The Committee meetings are open to the public and include participation from partner agencies, nonprofits, and the public.

Section C.20 Cost Reporting

The cost reporting provisions were a new requirement in FY 24-25. In compliance with these provisions, Valley Water prepared and submitted a fiscal analysis of the costs incurred to comply with these provisions (see Appendix 20-1). An estimated $20.3 million was expended in FY 24-25 to comply with the MRP. Consistent with regional stormwater program and Water Board guidance, Valley Water has submitted the Cost Reporting Summary and Source of Funds Summary in good faith, based on the best available stormwater program cost reporting data compiled from multiple sources and departments within Valley Water.

Section C.21 Asset Management

Valley Water prepared and submitted an Asset Management Plan (see Appendix 21-1). It contains a proposed asset management framework for stormwater quality hard assets owned by Valley Water based on MRP requirements. The Plan will be updated as lessons are learned through an adaptive management strategy. Currently, Valley Water has no hard assets as defined in the Permit. However, assets will be added to the local database after installation, and data will be used by appropriate inspection and/or maintenance staff to perform an initial condition assessment which will determine the frequencies and risks to develop appropriate operation and maintenance plans. Appropriate divisions will be included, based on where the systems are installed.

Please contact James Downing at 408-630-2679, or by e-mail at jdowning@valleywater.org regarding any questions or concerns.

Very truly yours,

DocuSigned by:
C48ACDFFEDDE450...

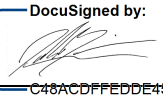
John Bourgeois
Legally Responsible Party
Deputy Operating Officer
Watershed Stewardship and Planning Division

SANTA CLARA VALLEY WATER DISTRICT
FY 2024-2025 ANNUAL REPORT

Certification Statement

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature by Duly Authorized Representative:

DocuSigned by:

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9/30/2025

John Bourgeois — Date
Legally Responsible Party
Deputy Operating Officer
Watershed Stewardship and Planning Division

FY 2024-2025 Annual Report
Permittee Name: Santa Clara Valley Water District

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Section 1 – Permittee Information

Background Information

Permittee Name:	Santa Clara Valley Water District (Valley Water)				
Population:	Valley Water is a non-population based co-permittee				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2022-0018, as amended				
Reporting Time Period (month/year):	July 2024 through June 2025				
Name of the Responsible Authority:	John Bourgeois			**Title:**	Deputy Operating Officer, Watershed Stewardship and Planning Division
Mailing Address:	5750 Almaden Expressway				
City: San Jose		**Zip Code:**	95118-3686	**County:**	Santa Clara
Telephone Number:	(408) 630-2990		**Fax Number:**		
E-mail Address:	Jbourgeois@valleywater.org				
Name of the Designated Stormwater Management Program Contact (if different from above):	James Downing			**Title:**	Senior Water Resources Specialist
Department:	Environmental Planning Unit				
Mailing Address:	5750 Almaden Expressway				
City: San Jose		**Zip Code:**	95118-386	**County:**	Santa Clara
Telephone Number:	(408)630-2679		**Fax Number:**		
E-mail Address:	Jdowning@valleywater.org				

Section 2 – Provision C.2 Reporting Municipal Operations

Program Highlights
Highlight/summarize activities for reporting year:

Summary:

Valley Water owns and operates the storm water drainage systems at its facilities, including storm drains, catch basins, vegetated swales, open drainage ditches, utility trenches, and storm drain laterals. Valley Water owns and maintains one vehicle maintenance and parking facility (Corporation Yard); and seven material storage facilities (Winfield Facilities, Brokaw, Camden, Willow, Aborn, Winchester, and Prospect Storage Yards). Valley Water continued to inspect and clean storm drains at its facilities. Formal inspections were completed in August and September 2024 and most BMPs were implemented according to site specific SWPPPs, while a few required action items to follow up and make corrections before the wet season. Due to staffing issues, equipment availability, and project prioritization, seven sites could not complete corrective actions before the wet season. However, one action was not completed before the first significant rain event in November 2024. A landslide from an adjacent property delivered a large amount of sediment onto Valley Water property, and the cleanup took significant time and resources. Temporary inlet protection measures were not in place before the first rain. Staff developed a plan with the site operator to ensure temporary BMPs are deployed if a similar issue arises in the future. Training occurred this year to increase awareness of Corporation Yard SWPPPs, BMPs, and spill/discharge response plan and contact. While staffing and resources continue to be a challenge, these trainings and reminders of annual inspections are anticipated to help with timely corrections of deficiencies for FY26.

During FY 24-25, Valley Water and its Land Manager, Santa Clara Valley Open Space Authority, conducted road maintenance, repairs, and regrading at Valley Water's Valley Water's Rancho Cañada de Pala Preserve. All appropriate BMPs were implemented during this work.

Valley Water staff participates in the SCVURPPP Municipal Operations AHTG. Refer to the C.2 Municipal Operations section of the SCVURPPP FY 24-25 Annual Report for a description of activities implemented at the countywide level.

C.2.a. ►Street and Road Repair and Maintenance

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of debris and waste materials during road and parking lot installation, repaving, repair, or maintenance activities from polluting stormwater
Y	Control of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater from discharging to storm drains from work sites
Y	Sweeping, vacuuming, and/or other dry methods to remove debris, concrete, or sediment residues, and spills or leaks, from work sites upon completion of work

Comments:

C.2.b. ►Sidewalk/Plaza Maintenance and Pavement Washing

Place a **Y** in the boxes next to activities where applicable BMPs were implemented and required to be implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not required and implemented for one or more of these activities during the reporting fiscal year, and then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Prevention of polluted wash water and non-stormwater from pavement, sidewalk and plaza cleaning, mobile cleaning, outdoor pressure washing operations, and washing down of trash areas and gas station or mobile fueling service areas from discharging to storm drains
N/A	Inclusion of sanitizing procedures in BMPs for washing down outside areas of human habitation
Y	Implementation of BMPs such as those included in the BASMAA Mobile Surface Cleaner Program or the CASQA good housekeeping videos
N/A	Coordination with sanitary sewer agencies to determine if disposal to the sanitary sewer is available for the wastewater generated from these activities, provided that appropriate approvals and pretreatment standards are met

Comments:

Valley Water normally does not conduct Sidewalk/Plaza Maintenance and Pavement Washing at its facilities. However, when it is required only water is used when pressure washing surfaces. As recommended in the CASQA Stormwater BMP Handbook, no soaps or detergents were used, storm drain inlets were protected with filter fabric and gravel bags, and wash water was directed to landscaped areas. Valley Water does not have areas with human habitation within its hardscaped facilities to wash down.

C.2.c. ►Bridge and Structure Maintenance and Graffiti Removal

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

N/A	Control of discharges from bridge and structural maintenance activities directly into surface waters or storm drains
Y	Control of non-stormwater and wash water discharges from graffiti removal activities
Y	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
Y	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities
Y	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities

Comments:
Graffiti on Valley Water property is not removed; it continues to be painted over, predominantly using rollers. We do not pressure wash or sandblast near standing or flowing water. When spraying is the preferred method, we cover the immediate area with ground cloths. Trucks used for graffiti removal are outfitted with water recovery equipment to contain and recover a spill if it were to occur.

C.2.e. ►Rural Public Works Construction and Maintenance

Does your municipality own/maintain rural[1] roads?	X	**Yes**		**No**

If your answer is **No**, then skip to **C.2.f**.

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
Y	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
N/A	Constructing roads and culverts that do not impact creek functions, including migratory fish passage
Y	Inspection of rural roads for structural integrity and prevention of impact on water quality
Y	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts, and address excessive erosion
Y	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
N/A	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or designing new culverts or bridge crossings

Comments (including listing increased maintenance in priority areas):

Valley Water's open space properties are evaluated annually for erosion, and repairs are prioritized and scheduled as needed. During the reporting period of July 1, 2024 to June 30, 2025, Valley Water conducted road maintenance, repairs, and regrading at Valley Water's Rancho Cañada de Pala Preserve. All appropriate BMPs were implemented during this work.

[1]Rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing or open space uses.

C.2.f. ►Corporation Yard BMP Implementation

Place an **X** in the boxes below that apply to your corporation yard(s):	
	We do not have a corporation yard.
	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit.
X	We have a **Stormwater Pollution Prevention Plan (SWPPP)** for the Corporation Yard(s).
Place an **X** in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:	
X	Control of pollutant discharges in stormwater such as wash water
X	Routine inspection of corporation yard(s) in August or September to ensure non-stormwater discharges have not entered the storm drain system and pollutant discharges are prevented to the maximum extent practicable
X	Containment of all vehicle and equipment wash areas through plumbing to sanitary sewer or other collection method
X	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection and disposal of all wash water to sanitary sewer or other location where it does not impact surface or groundwater if wet cleanup methods are used
X	Require private companies/contractors to use dry cleanup methods when cleaning debris and spills from corporation yard(s) or collect and dispose of all wash water to sanitary sewer or other location where it does not impact surface or groundwater if wet cleanup methods are used
X	Cover and/or berm outdoor storage areas containing pollutants

Comments:

Valley Water staff conduct formal stormwater inspections annually or more frequently as needed to ensure compliance with section C.2 of the MRP. The following facilities were inspected during FY 24-25:

Corporation Yard – Valley Water's Corporation Yard is located on the main campus and includes vehicle maintenance and parking areas, maintenance buildings, a fueling station, wash rack, motor pool parking areas, and heavy equipment parking. The fueling station consists of a concrete-paved fuel island, an overhead canopy, a permanent berm, and a trench to contain minor spills. The wash rack has a concrete pad which drains to an underground sump and clarifier, and ultimately discharges into the sanitary sewer system. Corporation Yard storm drains discharge directly to Guadalupe Creek (Outfall A), Guadalupe River (Outfall B), and Alamitos groundwater recharge pond. A culvert inlet protection device constructed of cinderblocks, filter fabric, and washed gravels is installed in the heavy equipment parking area at Outfall B.

Winfield Facilities – Valley Water's Winfield facility consists of supply warehouse buildings, a nursery plant storage area, outdoor general storage areas, sand/gravel storage areas, and parking areas. Storm drains from the Winfield facility discharge to Guadalupe River through the municipal storm drain system. Culvert inlet protection devices constructed of cinderblocks, filter fabric, and washed gravels are installed in all material storage areas. Storage piles are typically covered during the rainy season and when not in use.

Camden Yard – Valley Water's Camden Yard is used to store various stream maintenance related materials such as large tree trunks and large rocks. Camden Yard drains directly to Guadalupe Creek. A low berm was constructed along the perimeter of the material storage area to direct stormwater to straw wattles which are designed to settle and filter sediment before stormwater is discharged to the creek. Storage piles are typically covered during the rainy season and when not in use.

Brokaw Yard – Brokaw Yard is used to store large tree and rock material. The site is graded to allow stormwater runoff to drain into a large detention area in the middle of the site. The detention area is designed to detain runoff and settle sediment before discharging into Coyote Creek via a standing pipe and culvert. This is considered a permanent BMP.

Aborn, Winchester, Willow, and Prospect Storage Yards - These vacant yards are occasionally used to store large rock material, gravel, woodchips, or lumber for projects and are inspected annually. These occasionally used yards have been incorporated into the Camden Yard and Brokaw Yard SWPPPs.

Santa Teresa, Penitencia, and Rinconada Water Treatment Plants - Though not traditional corporation yards, Valley Water maintains SWPPPs and conducts annual stormwater inspections at each facility.

Accomplishments: During FY 24-25, all corporation yard facilities received annual stormwater inspections in compliance with provision C.2. Stormwater quality BMPs were also informally assessed throughout the year at Corporation Yard, Winfield Facilities, Headquarters/Almaden Campus and Camden Yard by trained facility staff onsite.

If you have a corporation yard(s) that is not an NOI facility, for inspection results for your corporation yard(s), complete the following table, provide a narrative above, or attach a summary including the following information:

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date[2]	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
Corporation Yard	Equipment Washing Clarifier, Heavy Equipment Parking, Equipment Maintenance shops, Welding Shop, Wood Shop Facilities Shops, etc. BMPs include site inspections; equipment work is conducted inside shop buildings unless equipment is too large. Clarifier and Fuel island are covered to prevent rain problems. Fuel Island is bermed. The drains are inspected and cleaned. A cinderblock, screened and rock BMP exists at one end of the yard to settle out sediment.	8/15/2024	BMPs in place. Replace filter fabric in inlet #1, only 1 inlet protection needed at inlet #3, pick up litter around perimeter of entire yard, sweep heavy equipment storage area, and close dumpster lid when not in use.	Cleanup was delayed due to staff shortage. All corrective action was completed on 9/12/24 before the first rain event.
		9/24/2024 10/18/2024 11/22/2024 12/16/2024 1/9/2025 2/6/2025 3/12/2025 4/18/2025 5/12/2025	No issues noted in monthly inspections; BMPs in place and effective.	N/A
Winfield Facilities	Vegetation Management Building and operational center, Hardware Warehouse, Sand bagging operations. BMPs include regular inspections, BMPs around storm drains to control sediment build up. Tarp materials piles to prevent	8/15/2024	BMPs in place and effective. Noted to clean sediment and leaves surrounding the inlet, sweep excess sediment in the equipment storage area, clean sediment in the tire storage area, clean litter and leaves around the perimeter, clean litter near the dumpsters and containers, and move e-waste under the overhead storage.	Staff shortage. Corrective action was not fully completed until 10/31/24, before the first rain event.

[2] Minimum inspection frequency is once a year between August 1 and September 30.

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date[2]	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
	Erosion. K-rail and dura wattle to contain sand.	10/9/2024 11/20/2024 12/16/2024 1/16/2025 2/3/2025 3/12/2025 4/18/2025 5/12/2025	No issues noted in monthly inspections; BMPs in place and effective. Full sweep of campus to get count of replacement filters and bags in October.	N/A. Replacement filters and bags installed by 10/31/24, before the first rain event.
Headquarters/Almaden Campus	Parking area for employees, Administrative Building, Headquarters Building, BMPs grassy swales on West and North parking lots.	8/15/2024	Remove litter from north bioswales, check sprinklers/irrigation in west parking lot (visitor parking section).	Trash cleaned up on 9/12/24. Completed before first rain event. Sprinkler audit with contractor to begin in October 2024 and is ongoing.
		9/27/2024 10/9/2024 11/22/2024 12/16/2024 1/31/2025 2/4/2025 3/2/2025 4/18/2025 5/12/2025	BMPs in place. Ongoing discussions to renew swales and sand filter. Note to remove weeds from the sand filter.	Sand filter weeds removed in Fall 2025.

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date[2]	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
Camden Storage Yard	Used to store rock and large woody debris for stream restoration activities. BMPs include a below grade yard that acts as a detention basin with an outlet that is rocked and waddled to capture any sediment as the yard decants.	9/5/2024	Cover and wattle dirt stockpile at north end of yard.	Stockpile covered and wattled on 9/12/24.
		7/16/2024 8/28/2024 9/30/2024 10/15/2024 11/14/2024 12/23/2024 1/22/2025 2/26/2025 3/27/2025 4/24/2025 5/14/2025 6/25/2025	Vegetation growing on the downstream side of the gravel BMP. Vegetation management notified.	N/A.
Brokaw Storage Yard	Used to store large tree and rock material. Site includes detention area in the center and rock gravel BMP on the back fence perimeter.	9/3/2024	Pick up litter around the perimeter and in the sediment basin. Cover and wattle dirt stockpiles.	Trash removed on 9/5/24. Dirt stockpiles are contained within the basin, which is considered a permanent BMP, so no runoff can occur. Confirmed with site supervisor.
Penitencia Water Treatment Plant	Water treatment plant BMPs include regular inspections, BMPs around storm drain inlets to control sediment build up. Tarp materials piles to prevent erosion.	9/5/2024	BMPs in place and effective. Remove sediment accumulated behind CA Department of Water Resources (DWR) tank. Remove litter by DWR tank.	Street sweeping occurred on 10/23/24, and all sediment was fully removed by 11/27/24. Sediment cleaning was delayed

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date[2]	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
				due to a staffing shortage. Trash belongs to DWR. Staff slowly removed all trash by early November.
Santa Teresa Water Treatment Plant	Water treatment plant BMPs include regular inspections, BMPs around storm drains to control sediment build up. Tarp materials piles to prevent erosion.	8/28/2024	Clean V-ditch before wet season, lift / cover / remove rusting equipment, curb gutters, secondary containment for porta potties, and fix leaking spigot. Erosion control needed at entrance into WTP.	The leaking spigot was used by contractors and was fixed the same day on 8/28/24. V-ditch and curb gutters cleaned on 9/5/24. Installed porta potties secondary contained on 9/5/24. Hydroseeding near the WTP front entrance was completed last week of September. Jute fabric and wattles installed week of 10/7/24. Completed before first rain event.
Rinconada Water Treatment Plant	Water treatment plant BMPs include regular inspections, and BMPs around storm drain inlets to control sediment build up.	9/19/2024	Evidence of irrigation runoff into V-ditch. Supervisor notified and will work with landscape contractor to address issue. Annual inlet cleaning, refresh filter fabric as needed, slope erosion control, control structure cleaning, and redirect irrigation runoff.	All items completed before the first rain event.

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date[2]	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
				Inlet cleaning completed on 10/19/24. V-ditch cleaning completed on 10/4/24. West Hill erosion BMP replaced on 10/18/24. East Hill Erosion control replaced on 10/25/24.
Aborn Court	Occasionally used to store large rocks or other materials for projects.	9/3/2024	Cover two dirt stockpiles and clean litter around the perimeter.	Dirt stockpiles covered by 9/17/24. Trash cleaned up under Good Neighbor Program on 10/2/24 before first rain event.
Willow Street Storage Yard	Vacant yard occasionally used to store large rock material for projects. If sediment piles onsite BMPs include tarp covering/wattles.	9/3/2024	BMPs effective; no follow up necessary.	N/A
Winchester Yard	Used to store large rock piles, large tree trunks, lumber, and cinderblock. BMPs include one covered storage area for wood materials and enclosed sea-crate.	9/5/2024	BMPs effective. Remove litter at rear fencing adjacent to Los Gatos Creek trail.	Litter cleaned up on 9/16/24.
Prospect Yard	Occasionally used to store wood chips or large rock piles for projects. If sediment piles onsite BMPs include tarp covering/wattles.	9/5/2024	Re-cover one dirt stockpile and refresh wattle / installed correctly. Pick up litter behind wall.	Corrective actions completed by 9/16/24.

C.2.h. ►Staff Training

Dates of Training	Training Topics Covered	Total number of Permittee maintenance staff	Permittee maintenance staff who attended training	
			Number	Percent
1/25/2025	Annual C.2 Stormwater Training – Corporation Yard SWPPPs and BMPs, Stormwater pollution prevention, appropriate BMPs for maintenance and cleanup activities, Spill and discharge response and notification procedures and contacts.	9	9	100
6/5/2025 6/12/2025	Stream Maintenance Program BMP Training – Focus was on stream maintenance program requirements but also included Corporation Yard SWPPPs and BMPs, Stormwater pollution prevention, appropriate BMPs for maintenance and cleanup activities, Spill and discharge response and notification procedures and contacts.	83	76	92

Comments:

Three stormwater staff members attended the presentations related to stormwater at the Annual CASQA Conference in October 2024. The SCVURPPP Rural Roads Stormwater Workshop was held on March 6, 2025. Ten staff who oversee maintenance work, conduct assessments, and/or coordinate inspections with contractors attended the workshop. Overview of MRP Provision C.2.e. requirements, sediment and erosion control BMPs for rural roads, a video of the Handbook for Forest, Ranch and Rural Roads by PWA, and a panel discussion on rural road inspection programs was provided.

Section 3 – Provision C.3 Reporting New Development and Redevelopment

C.3.b.iv.(2) ►Regulated Projects Reporting

Fill in attached table **C.3.b.iv.(2)** or attach your own table including the same information.

Valley Water has one regulated project that is currently under construction with two bioretention areas.

C.3.d.iv. ►Tree Runoff Reduction and Tree-Based Stormwater Treatment Systems.

(For FY 24-25 Annual Report only) Permittees may collectively submit a proposal which evaluates the benefit and associated criteria of runoff reduction associated with trees with respect to treatment control sizing.

See the C.3 section of the SCVURPPP FY 24-25 Annual Report. Following discussions with Regional Water Board staff, Permittees opted not to submit a proposal that evaluates the benefit and associated criteria for runoff reduction related to trees in the context of treatment control sizing. However, the stormwater benefits of trees are being considered by the Long-Term Green Infrastructure Technical Working Group (TWG) and recommendations, including evaluation of the benefits of trees, are included in the TWG report (see Provision C.3.j.v.(7) Long-Term Green Infrastructure Technical Working Group below).

C.3.e.iv. ►Alternative or In-Lieu Compliance with Provision C.3.c.

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?		**Yes**	N/A	**No**
Comments (optional): N/A				

C.3.e.v ► Special Projects Reporting

1. In FY 24-25, has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		**Yes**	N/A	**No**
2. In FY 24-25, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the **C.3.b.iv.(2)** Table, and the **C.3.e.v.** Table.		**Yes**	N/A	**No**

If you answered "Yes" to either question,

1) Complete Table C.3.e.v.
2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project.

C.3.h.v.(2). ► List of Newly Installed[1] Stormwater Treatment Systems and HM Controls

On an annual basis, before the wet season, provide a list of newly installed (installed within the reporting period) stormwater treatment systems and HM controls (for both regulated and non-regulated projects) to the local mosquito and vector control agency and include a copy of that information in the Annual Report. The list shall include the facility locations and a description of the stormwater treatment measures and HM controls installed.
(Optional) Also complete Table C.3.h.v.(2) ► Reporting Newly Installed Stormwater Treatment Systems and HM Controls

1. Did your agency provide the list of newly installed Stormwater Treatment Systems and HM Controls to the Vector Control agency, either individually or through the Countywide Program? (If no, provide an explanation.)		**Yes**	X	**No**
2. Is a copy of the communication, including the list of newly installed treatment/HM measures, included in your Annual Report?		**Yes, See Appendix 3-1**	X	**No, see SCVURPPP Annual Report for a copy of the communication and list.**

[1] "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

C.3.h.v.(3)(a) – (c) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Site Inspections Data	Number/Percentage
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the previous fiscal year (FY 23-24)	N/A
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the reporting period (FY 24-25)	N/A
Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 24-25). Include only stormwater related inspections.	N/A
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 24-25). Include only stormwater related inspections.	N/A %[2]
Comments:	

C.3.h.v.(3)(d)-(e) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.

Summary:

N/A. Valley Water does not currently own any installed stormwater treatment measures or HM controls that resulted from regulated projects within the San Francisco Bay Water Board Region 2.

In coordination with the County of Santa Clara, Valley Water conducts inspections for half (3) of the stormwater treatment measures resulting from the Permanente Creek Flood Protection Project at Rancho San Antonio County Park. Since the County of Santa Clara owns the park, inspection reporting will be submitted in the County's Annual Report.

[2] Based on the number of Regulated Projects in the database or tabular format at the end of the previous fiscal year, per MRP Provision C.3.h.ii.(6)(b).

Provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness of the program).
Summary: N/A

C.3.i. ►Required Site Design Measures for Small Projects and Smaller Detached Single Family Home Projects

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.
Summary: BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Permittees. Valley Water reviews all applicable projects for opportunities to implement at least one of the site design measures listed in Provision C.3.i.

C.3.j.iii. ► No Missed Opportunities

On an annual basis, submit a list of green infrastructure projects, public and private, that are planned for implementation during the permit term and infrastructure projects planned for implementation during the permit term that have potential for green infrastructure measures. Include the following information:

- A summary of planning or implementation status for each public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. (see C.3.j.iii.(2) Table B - Planned Green Infrastructure Projects).
- A summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. For any public infrastructure project where implementation of green infrastructure measures is not practicable, submit a brief description of the project and the reasons green infrastructure measures were impracticable to implement (see C.3.j.iii.(2) Table A - Public Projects Reviewed for Green Infrastructure).

Summary of Planning or Implementation Status of Identified Projects:

See attached Tables C.3.j.iii.(2)-A and C.3.j.iii.(2)-B for the required information. Additional project comment provided below.

The Future Emergency Interim Housing (EIH) Project located on Valley Water property at Cherry Avenue is a joint project between City of San José and Valley Water, which incorporates permeable gravel areas and stormwater retention and infiltration basins. The City and Valley Water will coordinate inspection and maintenance requirements after construction is complete. While the project is excluded under C.3.e.ii.(5) as an emergency housing project for people experiencing unsheltered homelessness, the project incorporated GSI measures[3] to minimize runoff going

[3]Based on verbal communication from City of San José staff on what they will include in their Annual Report.

directly into the adjacent Guadalupe Creek. The EIH project consists of modular housing with approximately 130 residential sleeping units, shared living facilities, community intake areas, offices, general storage, outdoor seating, pet relief and smoking area, fire access road, parking, and essential utilities. As a temporary emergency interim housing project, upon termination of the Collaborative Use Agreement the City will return the site back to its original condition. See City of San José's Annual Report for required information in Table B.

Additionally, Valley Water included several projects in the Stormwater Resource Plan for the Santa Clara Basin, which are still in the conceptual planning phases and have not yet progressed to the point of implementation. Valley Water also refers to BASMAA guidance to identify and review potential green infrastructure projects.

C.3.j.iv.(2) ► Participate in Processes to Promote Green Infrastructure

On an annual basis, report on the goals and outcomes during the reporting year of work undertaken to participate in processes to promote green infrastructure.

Please refer to the SCVURPPP FY 24-25 Annual Report for a summary of efforts conducted to help regional, State, and federal agencies plan, design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects.

C.3.j.v.(1)(a) ► Non-Regulated (Green Infrastructure) Projects Reporting

Fill in attached table **C.3.j.v.(1)(a)** with information on non-regulated GI projects that have completed construction during the reporting period, or attach your own table including the same information.

There were no non-regulated GI projects constructed during FY 24-25.

C.3.j.v.(1)(d) ► Tracking and Mapping Tools

Provide a summary report on the implementation of tracking and mapping tools and provide a link to the component which is available to the public.

Summary Report:

Please refer to the SCVURPPP FY 24-25 Annual Report for a summary of implementation of the tracking and reporting tools, and a link to the component which is available to the public.

C.3.j.v.(3) ► Numeric Retrofit Requirements

In each Annual Report, report on progress made towards the retrofit requirements described in Provision C.3.j.ii.(2).
As a non-population based (Flood Management Agency) permittee, Valley Water does not have a retrofit assignment. However, through the One Water Plan and Santa Clara Basin Stormwater Resources Plan, Valley Water supports SCVURPPP permittees to help meet the numeric retrofit requirement.

C.3.j.v.(6) ► One-time Offset of Numeric Implementation Retrofit Requirements

In FY 2022-23, did your jurisdiction submit a report to offset numeric implementation retrofit requirements by a one-time credit of up to 25 percent? (If no, move to the next table.)		**Yes**	N/A	**No**
Retrofit impervious area treated due to implementation of the ordinance in FY 24-25 (acres):	N/A			
Cumulative area of retrofit impervious area treated due to implementation of the ordinance up to the end of FY 24-25 (acres):	N/A			

C.3.j.v.(7) ► Long-Term Green Infrastructure Technical Working Group (TWG)

(For FY 24-25 Annual Report only) Collectively submit a report summarizing Long-Term GI TWG efforts and recommendations.
See the C.3 section of the SCVURPPP FY 24-25 Annual Report for a report summarizing TWG efforts and recommendations.

C.3.b.iv.(2) ►Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Reporting Period – July 1, 2024- June 30, 2025

Project Name Project No.	Project Location[4], Street Address	Name of Developer	Project Phase No.[5]	Project Type & Description[6]	Project Watershed[7]	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft^2)[8]	Total Replaced Impervious Surface Area (ft^2)[9]	Total Pre-Project Impervious Surface Area[10](ft^2)	Total Post-Project Impervious Surface Area[11](ft^2)
Private Projects											
N/A											
Public Projects											
Rinconada Water Treatment Plant Reliability Improvement Project	400 More Avenue, Los Gatos, CA 95032s	CDM Smith	4	Water treatment plant facility improvements	San Tomas	39	9	60,113	368,082	378,536	438,649
Comments:											

[4] Include cross streets
[5] If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".
[6] Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.
[7] State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.
[8] All impervious surfaces added to any area of the site that was previously existing pervious surface.
[9] All impervious surfaces added to any area of the site that was previously existing impervious surface.
[10] For redevelopment projects, state the pre-project impervious surface area.
[11] For redevelopment projects, state the post-project impervious surface area.

C.3.b.iv.(2) ►Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (private projects)

Reporting Period – July 1, 2024- June 30, 2025

Project Name Project No.	Project Status[12]	Estimated or Actual Completion Date[13]	Source Control Measures[14]	Site Design Measures[15]	Treatment Systems Approved[16]	Type of Operation & Maintenance Responsibility Mechanism[17]	Hydraulic Sizing Criteria[18]	Alternative Compliance Measures[19/20]	Alternative Certification[21]	HM Controls[22/23]
Private Projects										
N/A										

[12] Provide status of project (e.g., application date, application deemed complete date, project approval date).
[13] Provide an estimate of the construction completion date (e.g., specific month and year, or year). If not known, write "TBD" or not available.
[14] List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.
[15] List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.
[16] List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).
[17] List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners' association; O&M by public entity, etc…) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.
[18] See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).
[19] For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.iv.(2)(m)(i) for the offsite project.
[20] For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.iv.(2)(m)(ii) for the Regional Project.
[21] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[22] If HM control is not required, state why not.
[23] If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), biodetention unit(s), regional detention basin, or in-stream control).

C.3.b.iv.(2) ►Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (public projects)

Reporting Period – July 1, 2024- June 30, 2025

Project Name Project No.	Approval Date[24]	Date Construction Scheduled to Begin or Date of Completion	Source Control Measures[25]	Site Design Measures[26]	Treatment Systems Approved[27]	Operation & Maintenance Responsibility Mechanism[28]	Hydraulic Sizing Criteria[29]	Alternative Compliance Measures[30/31]	Alternative Certification[32]	HM Controls[33/34]
Public Projects										
Rinconada Water Treatment Plant Reliability Improvement Project	May 26, 2015	Construction began July 20, 2015	Beneficial Landscaping; Use water efficient irrigation systems; Good housekeeping; Covered loading docks	Protect existing trees, vegetation, and soil; Plant trees adjacent to other impervious areas	Bioretention area	Maintenance O&M Plan for Valley Water	3: Combination Flow and Volume Design Basis	N/A	No	Detention Basin
Comments: Valley Water has one regulated project that is currently under construction with two bioretention areas.										

[24] For public projects, enter the date on which the project was authorized to move forward, such as approval of a CIP, budget, or other action.
[25] List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.
[26] List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.
[27] List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).
[28] List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc.) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.
[29] See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).
[30] For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.iv.(2)(m)(i) for the offsite project.
[31] For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.iv.(2)(m)(ii) for the Regional Project.
[32] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[33] If HM control is not required, state why not.
[34] If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), biodetention unit(s), regional detention basin, or in-stream control).

C.3.h.v.(2). ►Table of Newly Installed[35] Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

Reporting Period – July 1, 2024- June 30, 2025

Fill in table below or attach your own table including the same information.

See the SCVURPPP FY 24-25 Annual Report for a copy of the communication to Vector Control.

Name of Facility	Address of Facility	Party Responsible[36] For Maintenance	Type of Treatment/HM Control(s)
Public or Private Regulated Projects			
N/A			
Public or Private Non-regulated GI Projects			
N/A			

[35] "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.
[36] State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v. Special Projects Reporting Table

Reporting Period – July 1, 2024- June 30, 2025

Project Name & No.	Permittee	Address	Application Submittal Date[37]	Status[38]	Description[39]	Site Total Acreage	Total Impervious Surface Created / Replaced[40](ft²)	Gross Density DU/Acre	Density FAR	Special Project Category[41]	Category C Projects: # of DUs in each AMI Category and # of Manager's DUs	LID Treatment Reduction Credit Available[42]	List of LID Stormwater Treatment Systems[43]	List of Non-LID Stormwater Treatment Systems[44]
N/A														

[37] Date that a planning application for the Special Project was submitted. If a planning application has not been submitted, include a projected application submittal date.
[38] Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.
[39] Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.
[40] The total impervious surface in acres created or replaced by the project, which is subject to the treatment requirements listed in Provision C.3.e.ii.(1).
[41] For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.
[42] For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.
[43] List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.
[44] List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

Special Projects Narrative

N/A

C.3.j.iii.(2) ► Table A - Public Projects Reviewed for Green Infrastructure

Project Name and Location[45]	Project Description	Status[46]	GI Included?[47]	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement[48]
Headquarters Demonstration Garden	Installation of a demonstration garden as a living model of compliance with Valley Water's Landscape Rebate Program guidelines. Includes identifying and integrating existing stormwater capture infrastructure into the garden design, refurbishing and enhancing it where necessary to maximize water conservation and minimize runoff.	Planning and design	TBD	Stormwater capture systems will be considered in the design for the demonstration garden. Due to project scope and funding focused on the demonstration garden area, retrofitting legacy bioswales in the parking lot to conform to current C.3 specifications is not practical through this project.

[45] List each public project that is going through your agency's process for identifying projects with green infrastructure potential.
[46] Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.
[47] Enter "Yes" if project will include GI measures, "No" if GI measures are impracticable to implement, or "TBD" if this has not yet been determined.
[48] Provide a summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. If review of the project indicates that implementation of green infrastructure measures is not practicable, provide the reasons why green infrastructure measures are impracticable to implement.

C.3.j.iii.(2) ► Table B - Planned Green Infrastructure Projects During the Permit Term

Project Name and Location[49]	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
See City of San José's Annual Report for required information on the Future Emergency Interim Housing Project (Cherry Ave.)			

[49] List each planned (and expected to be funded) public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. Note that funding for green infrastructure components may be anticipated but is not guaranteed to be available or sufficient.

C.3.j.v.(1)(a)►Non-Regulated (Green Infrastructure) Projects Reporting Table – Projects Constructed During the Fiscal Year Reporting Period

Reporting Period – July 1, 2024- June 30, 2025

Project Location, Street Address	Name of Owner	Project Description	Construction Completion Date	Treatment Measures	Party Responsible for O&M	Hydraulic Sizing Criteria[50]	Total Area Draining to Treatment Measures (ft^2)	Impervious Area Treated (ft^2)	Pervious Area Treated (ft^2)
N/A									
Comments:									

[50] See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

Section 4 – Provision C.4 Industrial and Commercial Site Controls

Program Highlights and Evaluation **Highlight/summarize activities for reporting year:**
Summary: Not applicable to Valley Water.

C.4.d.iii.(1)(a) & (c) ► Facility Inspections

Fill out the following table or attach a summary of the following information. Indicate your reporting methodology below.

	Permittee reports multiple, discrete, potential and actual discharges at a site as one enforcement action.
	Permittee reports the total number of discrete potential and actual discharges at each site.

	Number
Total number of inspections conducted (C.4.d.iii.(1)(a))	N/A
Total number of enforcement actions, or discrete number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(1)(c))	N/A

Comments:
N/A

C.4.d.iii.(1)(b) ► Number of Each Type of Enforcement Conducted

Fill out the following table or attach a summary of the following information.

	Enforcement Action (As listed in ERP)[1]	**Number of Enforcement Actions Taken**
Level 1	N/A	N/A
Level 2	N/A	N/A
Level 3	N/A	N/A
Level 4	N/A	N/A
Total	N/A	N/A

C.4.d.iii.(1)(d) ► Frequency of Potential and Actual Non-Stormwater Discharges by Business Category

Fill out the following table or attach a summary of the following information.

Business Category[2]	**Number of Actual Discharges**	**Number of Potential Discharges**
N/A	N/A	N/A

C.4.e.iii ► Staff Training Summary

Training Name	**Training Dates**	**Topics Covered**	**No. of Industrial/ Commercial Site Inspectors in Attendance**	**Percent of Industrial/ Commercial Site Inspectors in Attendance**	**No. of IDDE Inspectors in Attendance**	**Percent of IDDE Inspectors in Attendance**
N/A	N/A	N/A	N/A	N/A	N/A	N/A
Comments: N/A						

[1]Agencies to list specific enforcement actions as defined in their ERPs.
[2]List your Program's standard business categories.

Section 5 – Provision C.5 Illicit Discharge Detection and Elimination

Program Highlights and Evaluation
Highlight/summarize activities for reporting year:

Provide background information, highlights, trends, etc.

Summary:

Valley Water addresses illicit connection/illegal dumping (IC/ID) incidents effectively through its hazardous materials Emergency Response (ER) Program. Valley Water received and responded to a total of 223 emergency response reports throughout Santa Clara County during FY 24-25, 52 more than in FY 23-24. Of these, 171 were within the jurisdiction of the San Francisco Bay Regional Water Quality Control Board (Region 2), 53 (44 within Region 2) were discharge events that reached a waterway, and 37 (28 within Region 2)[1] required a response by a team member or members for general investigation, source identification, multi-agency coordination, and clean up or evidence collection. Valley Water is one of the few Santa Clara County Permittees that has 24-hour availability to conduct storm and stream water pollution investigations. Valley Water staff will, as needed, investigate, and collect evidence at a site that can later be transferred to the appropriate jurisdictional authority on the next business day. Jurisdictional authority could reside with a co-permittee, state, or federal agency. Valley Water responded within target field response time 100% of the time for all incidents requiring urgent field response.

Water Resource Protection Ordinance Code Enforcement Program

To protect Valley Water owned public lands, Valley Water regulates use of the agency's property through the Water Resources Protection Ordinance. The Water Resources Protection Manual, which includes measures to protect the riparian corridor, is utilized for case development. For FY 24-25, the Community Projects Review Unit's Code Enforcement Program processed 207 cases. Of the 207 cases, encroachment violations accounted for 35% of the cases. Encroachments (unauthorized private use of Valley Water's property) often occur on creekside or near-creekside lands and can have negative impacts on the stream environment due to increased erosion from irrigation and overland drainage, the potential for the introduction of pesticides into the creek, planting of non-native and invasive plant species in the riparian corridor, grading of creek banks, and dumping. Valley Water has been protecting creekside public lands by remediating encroachments for over 40 years. Approximately 21% of the cases were for illegal dumping on Valley Water property, which is predominately creekside. Dumped items consisted of trash, soil, vegetation, pet waste, construction/ fencing materials, cooking grease and cigarette butts. Drainage issues included broken sprinklers and irrigations systems. Outfalls are another common drainage issue, where a drainage is directed through a pipe. These pipes are usually discharging water collected in residents' yard during the rainy season but have been used to discharge pool water as well.

[1] In FY 2022-2023 and FY 2023-2024 Annual Reports, the incorrect field response data column was used. In FY23, 39 reports (37 within Region 2) required field response, compared to the 62 (51 within Region 2) reported; and in FY24, 34 reports (29 within Region 2) required field response, instead of 115 (91 within Region 2) reported. These numbers are more consistent with previous reporting in prior years and in this current FY.

Water Waste Program

Valley Water started the Water Waste Program in 2014. Water waste reports are received from the public through an online submission tool (Access Valley Water), the Water Wise Hotline (408-630-2000), and via email through WaterWise@valleywater.org. These reports are dispatched to the water waste team who contact the responsible party, or reports are referred to the property's water retailer, to ensure they are aware of the issue(s) that may be contributing to water waste. Letters are mailed to the property owner outlining the reported water waste and highlighting Valley Water rebate programs, free services, and resources that could assist in resolving the issue(s). Inspections may be conducted depending on the severity of the reported water waste. Throughout FY 24-25, the water waste team followed an educational approach for all water waste reports, in accordance with Valley Water Ordinance No. 23-02. Valley Water continued to spread the message regarding the ban on irrigating non-functional turf at commercial, industrial, and institutional properties.

Valley Water processed 353 water waste reports in FY 24-25, which were responded to within 24-business hours and ultimately resolved. The time required to resolve cases varies depending on the nature of the report, the details included with the initial report, the receptiveness of the property with the reported violation, and the stakeholders involved (typically but not limited to the water retailer or city). With the end of the most recent drought, this decline in reporting was expected. Reports involved water leaks from broken plumbing and irrigation systems, overspray onto pavement, irrigation runoff, and watering during the wrong time of day. Irrigation runoff from excessive watering, overspray onto impervious surfaces and leaking irrigation systems can all be mechanisms for the transport of urban pollutants such as oils, herbicides, pesticides, fertilizers, and lawn clippings to creeks, which can ultimately degrade stream water quality.

PROGRAM EVALUATION

The ER Program is recognized as an effective and timely means of addressing acute contaminants that are illegally dumped or discharged to Valley Water waterways, reservoirs, lands, and facilities. The ER Program's performance was evaluated within the context of Valley Water's Safe Clean Water and Natural Flood Protection Program. Valley Water effectively reduces the discharge of pesticides, fertilizers, sediment, and other pollutants to waterways and the storm drain system through its Water Resource Protection Ordinance Code Enforcement Program and Water Waste Program.

ADDITIONAL ACTIVITIES

Valley Water staff participates actively in the SCVURPPP Industrial and Illicit Discharge Detection and Elimination (IND/IDDE) AHTG. Please refer to the C.5 Illicit Discharge Detection and Elimination section of the SCVURPPP FY 24-25 Annual Report for a description of activities implemented at the Countywide and/or regional level.

C.5.d.iii.(1) ►Spill and Discharge Complaint Tracking

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)

	Number
Discharges reported (C.5.d.iii.(1)(a))	171
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(1)(b))	44
Discharges resolved in a timely manner (C.5.d.iii.(1)(c))	171

Comments:
Valley Water responded to 171 illicit connection/illegal dumping (IC/ID) reports in the San Francisco Bay Region through its hazardous materials ER Program. This 24-7 program responds reactively to IC/ID incidents by providing referral and inter-agency cooperation and/or conducting field investigation and clean-up activities as appropriate. The Pollution Hotline responds to incidents reported by Valley Water field workers, staff from other agencies, and members of the public.

C.5.e.iii.(2)(a)&(c) ► Mobile Sources Inspections and Enforcement

Fill out the following table or attach a summary of the following information.

	Number
Mobile business inspections conducted (C.5.e.iii.(2)(a))	N/A

Summary of the enforcement actions taken against mobile businesses during the reporting year (C.5.e.iii.(2)(c)).

Summary:
N/A

C.5.e.iii.(2)(b) ► Frequency of Mobile Sources Inspections by Business Type

Fill out the following table or attach a summary of the following information.

Mobile Business Type[2]	**Number Inspected**[3]
N/A	N/A

Comments: N/A

[2] Including, but not limited to, automobile washing, vehicle fueling, power washing, steam cleaning, graffiti removal and carpet cleaning.
[3] The number of each type of mobile business inspected

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(1)(a), (b), (c), (d), (e) ►Site/Inspection Totals

Total number of construction sites requiring inspections during at least part of the Permit year; (C.6.e.iii.1.a)	**Total number of active hillside sites disturbing <1 acre of soil requiring inspection** (C.6.e.iii.1.b)	**Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection)** (C.6.e.iii. 1.d)	**Number of sites disturbing ≥ 1 acre of soil** (C.6.e.iii.1.c)	**Total number of storm water runoff quality inspections conducted (include only Hillside Sites, High Priority Sites and sites disturbing 1 acre or more)** (C.6.e.iii. 1.e)
13	0	3 (BMP Action Plans)	10	137

Comments:
During active construction work, a total of 137 monthly inspections were conducted at 13 Valley Water (VW) construction sites throughout Santa Clara County during FY 24-25 compared to 187 monthly inspections at 19 sites in FY 23-24. All reported monthly inspections reported here were conducted within the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) jurisdiction.

	Provide the number of inspections that are conducted at sites not within the above categories as part of your agency's inspection program and a general description of those sites, if available or applicable. Does not apply.

C.6.e.iii. (1)(f) ►Construction Related Storm Water Enforcement Actions

	Enforcement Action (as listed in ERP)[1]	Number Enforcement Actions Issued
Level 1[2]	Verbal Warning	19
Level 2	Written Warning	0
Level 3	Notice of Non-compliance/Notice to Abate a Public Nuisance and/or a Stop Work Order	0
Level 4	Legal Action	0
Total		**19**

C.6.e.iii. (1)(g), ►Illicit Discharges

	Number
Number of illicit discharges, actual and potential, of sediment or other construction-related materials	1

C.6.e.iii. (1)(h) ► Corrective Actions

Indicate your reporting methodology below.

X	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
	Permittee reports the total number of discrete potential and actual discharges on each site.

	Number
Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	5

Comments:
Valley Water completed a total of 137 inspections throughout Santa Clara County during FY 24-25 within the jurisdiction of the SFBRWQCB. Stormwater non-compliance (BMP deficiencies) issues identified during inspections were communicated to contractors by 19 verbal warnings and zero (0) written warnings. Of the total of nineteen (19) identified non-compliance issues, five (5) were corrected in a timely manner within 10

[1] Agencies should list the specific enforcement actions as defined in their ERPs.
[2] For example, Enforcement Level 1 may be Verbal Warning.

business days, two (2) non-compliance issues were corrected within 10 to 30 days, and twelve (12) non-compliance issues were corrected in over 30 days at the following project sites: Anderson Dam Tunneling Project (6 non-compliance issues), FOCP Coyote Percolation Dam Project (< 1 acre disturbance site, 2 non-compliance issue), Coyote Creek Chillers Plant Project (2 non-compliance issues), Rinconada Water Treatment Plant (RWTP) Reliability Improvement Project (9 non-compliance issues).

Explanation for Enforcement Action(s) Not Resolved within 10 Business Days:

(A) Anderson Dam Tunneling Project (ADTP):

(1) Monthly Environmental Compliance Inspection Report (MECIR) dated November 25, 2024: Verbal Warning for Sediment Control: This inspection was focused solely on the performance of SWPPP BMPs. Needed a dry period for mud to dry and enable removal of any sediment accumulation behind straw wattles along the soil stockpile slope. Dry weather was predicted through mid-December 2024 to allow placement of more straw wattles on the slope (needed no more than 15 ft. spacing between the straw wattle rows for permit compliance).

Comments/Rationale for Longer Compliance Time: During the January 27, 2025, Monthly Environmental Compliance Inspection Reporting the slope showed little to no erosion in the form of erosion rills. The straw wattle at the bottom of the road was functioning properly and was accumulating sediment. While the wattle had not been overtopped, it had accumulated sediment which needed to be shoveled out to restore its capacity. Jute netting had been placed to stabilize the slope. The straw wattle and sandbags at the bottom of the slope were functioning properly and were accumulating sediment. However, the area behind the wattle was nearly full and a little sediment had overtopped this section. This area needed to be shoveled out to restore its capacity. This condition was addressed as of January 10, 2025. These complex actions were completed in an estimated 46 calendar days; this delay was primarily due to the long period of wet weather during that time. Some BMPs could not be accessed while the soil was wet without likely causing additional erosion.

(2) ADTP Monthly Environmental Compliance Inspection Report (MECIR) dated December 30, 2024: (1) Verbal Warning for Sediment Control: Stormwater drain inlet sandbags on access road required repairs and cleanup. (2) Verbal Warning for Erosion Control: Erosion rills observed on slope that required fixing by contractor using Flexterra Soil Stabilizer.

Comments/Rationale for Longer Compliance Time: The Verbal Warning was issued to contractor on 01/02/2025 and corrective action for BMP repairs completed on 01/16/2025 (14 calendar days) that exceeded the 10-business day limit marginally due to weather issues. There were no reportable non-storm water or storm water compliance violations.

(B) Coyote Creek Percolation Dam Project:

Monthly Environmental Compliance Inspection Report (MECIR) dated February 24, 2025: Verbal Warning for Erosion Control: Contractor fixed the damaged erosion control measures (slope blanket/fabric net) damaged from wild pigs within about 30 business days.

Comments/Rationale for Longer Compliance Time: All temporary construction BMP measures had been removed. Hydroseed and Erosion Control replaced/repaired blankets were placed and were working as of 2/19/25 in 25 calendar days (confirmed during Final Site Walk). The delay was attributable to the contractor's coordination for BMP repair work.

(C) Coyote Creek Chillers Plant Project

(1) Monthly Environmental Compliance Inspection Report (MECIR) dated August 29,2024: Verbal Warning for Sediment Control: Silt fencing and wattles along West property line required mending or replaced. Pending re-inspection. A Verbal Warning was issued to the contractor on 08-29-2024. Expected Date of BMP Corrective Action: 09-13-2024.

Comments/Rationale for Longer Compliance Time: The contractor was on and off site throughout those times and waiting on the delivery of the Silt Fencing. Noted BMP deficiency was corrected in a reasonable time estimated to be done by 09-13-2024. There were no reportable non-storm water or storm water compliance violations during the dry period.

(2) Monthly Environmental Compliance Inspection Report (MECIR) dated September 30, 2024: Verbal Warning for Sediment Control: Silt fencing and wattles along West property line still required mending or to be replaced. Contractor was notified in August 2024. Expected Date of BMP Corrective Action: 09-13-2024. The Contractor had been off site waiting to procure items required for project work (cathodic protection) that delayed the implementation of the noted BMP corrective action.

Comments/Rationale for Longer Compliance Time: The contractor was on and off site throughout those times and waiting on the delivery of the Silt Fencing. Noted BMP deficiency was not corrected within 30 days of the initial warning. There were no reportable non-storm water or storm water compliance violations during the dry period.

(D) Rinconada Water Treatment Plant (RWTP) Reliability Improvement Project

(1) Monthly Environmental Compliance Inspection Report (MECIR) dated July 9-31, 2024: Verbal Warning for Sediment Control: On 06/20/24, requested the contractor to replace damaged BMPs around the Drain Inlets (DIs) from heavy equipment traffic. The SWPPP consultant reminded the contractor to maintain all BMPs on 06/20. Damaged BMPs were not replaced until 07/12/24. With the new SWPPP Amendment No.2, DI BMPs were changed to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. Not all DI BMPs were changed to Top Guard. Previous BMPs are still acceptable. The contractor informed VW that more time was needed to order more gravel bags. There were miscommunications amongst the contractor crew. BMPs in question were replaced by 7/12/24.

(2) Monthly Environmental Compliance Inspection Report (MECIR) dated August 19, 2024: Verbal Warning for Sediment Control: On 08/19, requested the contractor to replace damaged drain inlet BMPs. Damaged BMPs were not replaced on 08/19/24. Contractor updating the BMPs per Amendment No.2. (Orange Top Guard by Ertec Drainage Inlet protection). Expected BMP corrective action implementation: 09/02/2024.

(3) Monthly Environmental Compliance Inspection Report (MECIR) dated September 26, 2024: Verbal Warning for Sediment Control, Erosion Control, and Non-Stormwatrer Management: VW gave verbal warnings to contractor on 9/26/2024 for the following (a) Sediment Control: Damaged Gravel Bags around Drain Inlets (DIs) at SP-1, DI-4, DI-6, and DI-13 needed repairs/replacing. With the new SWPPP Amendment No.2, DI BMPs were changed to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. Not all DI BMPs were changed to Top Guard. (b) Erosion Control: Visqueen on the slope next to DI-5 needed replacing. (c) Non-Stormwater: Material storage between the Ozone and Flocculation/Sedimentation Buildings required improvements work. Contractor's expected BMP corrective action date - 10/10/2024

(4) Monthly Environmental Compliance Inspection Report (MECIR) dated October 24, 2024: Verbal Warning for Good Site Management, Sediment Control, and Erosion Control: VW gave verbal warnings to contractor on 10/24/2024 for the following (a) Good Housekeeping: Contractor to place Curb & Gutter at entrance. (b) Sediment Control: Damaged Gravel Bags around Drain Inlets needed repairs/replacing. With the new SWPPP Amendment No.2, DI BMPs were changed to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. Not all DI BMPs were changed to Top Guard. (c) Erosion Control: Visqueen on slope next to DI-5 needed replacing. Contractor's expected BMP corrective action date - 11/07/2024

(5) Monthly Environmental Compliance Inspection Report (MECIR) dated November 22, 2024: Verbal Warning for Sediment Control, and Erosion Control: VW gave verbal warnings to contractors on 11/22/2024 for the following (1) Sediment Control: Damaged Gravel Bags around Drain Inlets needed repairs/replacing. With the new SWPPP Amendment No.2, DI BMPs were changed to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. Not all DI BMPs were changed to Top Guard. (2) Erosion Control: Visqueen on slope next to DI-5 replaced. Black mesh straw wattles removal required. Contractor's expected BMP corrective action date - 12/06/2024

(6) Monthly Environmental Compliance Inspection Report (MECIR) dated December 19, 2024: Verbal Warning for Good Site Management and Non-Stormwater Management: (1) Good Site Management: Contractor continued to implement the SWPPP Amendment No. 2 changes from 06/25/24. Amendment to the current SWPPP plan pending again after the SWPPP walk from 12/19/2024 (Amendment #3.) (2) Non-Stormwater Management: Subcontractor trailers parked east of centrifuge building had been leaking hydraulic fluid. Informed Contractor via email as a verbal warning with photos on 12/19/2024. The contractor was expected to implement BMP corrective action by 01/06/2025.

Comments/Rationale for Longer Compliance Time for MECIRS (August 2024 through December 2024) in Items 1 – 6 above: With the new SWPPP Amendment No.2, DI BMPs were changed to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. Not all DI BMPs were changed to Top Guard. Drains were continually inspected and protected during the updates to vehicle resistant inlet protection. Noted BMP deficiencies were corrected in over 30 business days due to stated reasons as above. There were no reportable non-storm water or storm water compliance violations.

(7) Monthly Environmental Compliance Inspection Report (MECIR) dated January 29, 2025: Verbal Warning for Good Site Management and Non-Stormwater Management: (1) Good Site Management: Contractor completed implementing the SWPPP Amendment No. 2 changes from 06/25/24 related to the Top Guard Drain Inlet Protection. (2) Non-Stormwater Management: Subcontractor trailers parked east of

centrifuge building continued to leak hydraulic fluid from end of the hose. Informed contractor of this Verbal Warning on 01-29-2025 via email with photos. The contractor's expected due date to implement BMP corrective action was 02/12/2025.

(8) Monthly Environmental Compliance Inspection Report (MECIR) dated February 26, 2025: Verbal Warning for Sediment Control and Non-Stormwater Management: On 2/20/25, small amount of sewerage water went inside DI-2 from the contractor's office trailers. Most of the fluid was stopped from entering the DI. Witch's hat below the grate captured most of the fluid. Fluid in the gutter was quickly cleaned using the spill kit and absorbent materials. Materials used to clean up were bagged and tagged. Informed Contractor via email as a verbal warning with photos on 2/26/2024. The contractor's expected due date to implement BMP corrective action was 03/12/2025.

Comments/Rationale for Longer Compliance Time for MECIR (January and February 2025) in Items 7 & 8 above: With the new SWPPP Amendment No.2, DI BMPs were changed from gravel bags to Top Guard Drain Inlet Protection. No more gravel bags, at least in the high traffic areas. The DI BMPs were changed from gravel bags to Top Guard gradually over a few months' time, there were no permit violations. The issue of hydraulic oil leak from parked trailers was internal to VW (not on contractor), but nevertheless, it was a SWPPP issue. There were small droplet leaks dripping from the end of a hose at the parked trailers. VW operations took longer than expected to deal with their subcontractor to eliminate this problem. The corrective action involved putting the hydraulic hose upright instead of letting it hang down and gravity drip the excess oil droplets. The trailers are parked on the shared paved driveway, just east of the loadout structure. There was no stormwater permit violation as the leak was contained. Noted BMP deficiencies were corrected in over 10 business days due to stated reasons as above. The issue of small amount of sewerage water entering a drain inlet (DI-2) from the contractor's office trailers was addressed by stopping it from entering the DI and it never left the site. The witch's hat below the grate captured nearly all of the fluid with minimal drips observed at the bottom of the DI. Drips of fluid in the DI were quickly cleaned using the spill kit and absorbent materials. Materials used to clean up were bagged and tagged. Informed Contractor via email as a verbal warning with photos on 2/26/2025. The contractor's expected due date to implement BMP corrective action was 03/12/2025 (over 10 business days). There were no reportable non-storm water or storm water compliance violations associated with the above.

(9) Monthly Environmental Compliance Inspection Report (MECIR) dated March 31, 2025: Verbal Warning for Good Site Management: The contractor was to submit SWPPP Amendment No. 4 in coming days. Received a copy of Amendment No.4. The contractor was expected to implement corrective action by 04/14/2025

Comments/Rationale for Longer Compliance Time for MECIR dated March 31, 2025, in Item 10 above: There was a minor administrative delay over 10 business days (14 days) in implementing the SWPPP Amendment 4 related to a change in sample point locations and dewatering procedures. There were no reportable non-storm water or storm water compliance violations.

Proposed Improvements:

Continue diligent enforcement of VW's Enforcement Response Plan (ERP). Remind contractors during weekly site construction meetings to ensure that all BMP related materials and personnel are available to implement any BMP corrective actions in a timely manner before the next rain event and no longer than 10 business days after issuance of warnings to contractors on deficiencies or BMP failures. Provide as-needed stormwater compliance training to the Construction Inspection Services Unit to discuss BMP monitoring and ensure that timely escalation of enforcement continues.

C.6.f.iii ►Staff Training Summary

Training Name	Training Dates	Topics Covered	Total Number of C.6 inspectors (both municipal and non-municipal staff)	No. of C.6 inspectors in Attendance (both municipal and non-municipal staff)
2-Day Qualified SWPPP Practioner (QSP) Training	November 6, 7, 2024; February 25, 26, 2025	2009 & 2022 CA Stormwater Construction General Permit requirements: SWPPP development and implementation, inspections, stormwater sampling, and BMPs	6	6
Qualified SWPPP Practioner/Developer (QSP/QSD) Training	February 20, 2025	2009 & 2022 CA Stormwater Construction General Permit	2	2
Inspector of Sediment and Erosion Control (CISEC) Certification	April 22, 23, 24, 2025	Observing, inspecting, and reporting on the implementation of Sediment and Erosion Control (S&EC) plans and reports, such as SWPPPs	1	1
Stream Maintenance Program Construction BMP Training	June 5, 2025	Permit requirements, best management practices for construction (e.g., erosion and sediment control, good site management, non-stormwater management, vegetation management, post-project restoration BMPs), and enforcement response/illicit discharge reporting, large woody debris removal	2	2

Comments:

Valley Water (VW) Construction Inspectors regularly attend the SCVURPPP facilitated Storm Water trainings when offered. There were no SCVURPPP facilitated trainings in FY 24-25, however all staff are current on training from an in-house training workshop conducted by a VW consultant on July 24, 2023 and other staff trainings listed in the Table above. The Training sessions were attended by the Construction Management Services Unit (CMSU) staff (Engineers) and Construction Inspection Services Unit (CISU) Inspectors who inspect District's active capital project construction sites to ensure compliance with stormwater requirements in the Municipal Regional Permit (MRP) Provision C.6. Selected staff from both the CMSU and CISU attended QSD/QSP trainings hosted by Stormwater consultants during FY 24-25 (see Table above). The CMSU's Senior Engineer (Pollution Prevention and Environmental Compliance), assisted by an Assistant Engineer, attend the Monthly CISU Staff meetings to provide as-needed stormwater compliance and MECIR's training to CISU inspection staff and answer any questions from them on BMP monitoring.

Valley Water's Stream Maintenance Program (SMP) authorizes routine work needed to preserve flood conveyance capacity. Program elements are designed to avoid, minimize or mitigate potential impacts in balance with the need to conduct work in streams to carry out Valley Water's mission. While this work is not a part of a traditional construction site, the SMP incorporates MRP regulations into the regulator approved BMPs as detailed in the SMP Manual, Attachment A: https://s3.us-west-2.amazonaws.com/assets.valleywater.org/R14290%20SMP%20%E2%80%93%20COMBINED%20%2803-05-20%29_0.pdf. The SMP requires an annual Construction BMP Training to Valley Water construction crews and contractors to comply with SMP permit requirements before annual work begins in the summer. The training covers permit requirements, best management practices for construction (e.g., erosion and sediment control, good site management, non-stormwater management, vegetation management, post-project restoration BMPs), and enforcement response plan/illicit discharge reporting, cultural resource reporting, large woody debris removal, and species of concern within project area.

Section 7 – Provision C.7. Public Information and Outreach

C.7.g.iii.(1) ► Reporting

Submit a table listing the types of outreach programs implemented during that Permit year along with a brief description. The table should be a cumulative table showing the number, if applicable, of each type of outreach campaigns or events occurring during each Permit year.

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
C.7.a. Outreach Campaigns	Refer to the C.7 Public Information and Outreach section of the SCVURPPP FY 24-25 Annual Report for outreach activities conducted Countywide by SCVURPPP. SCVURPPP conducted the Watershed Watch Campaign which included media advertising, website, social media promotions, and partnership development.	Ongoing	Ongoing	Ongoing		
	SCVURPPP provided funding to the City of San Jose to conduct the anti-litter/volunteering for cleanups campaigns with the San Jose Sharks and the San Jose Earthquakes.	Two campaigns	One campaign	One Campaign		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	In addition to the Countywide efforts above, Valley Water serves a community of nearly 1.9 million with excellent outreach programs to many sectors. Key elements include: • A popular Education Outreach Program • A Youth Commission • A growing Adopt-A-Creek Program and creek cleanup events supporting citizen participation • Attendance at community events targeting the general public • A Grant Program that provides funding to several programs that include community engagement and public outreach components, such as conducting trash cleanup events, implementing	Ongoing	Ongoing	Ongoing		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	docent-led walks, and creating interpretive displays • Flood Awareness Guide and Creekwise Mailer, which include stormwater pollution prevention messages • A Spring and Summer Conservation outreach campaign, "Bring Your Yard to Life!", uses paid digital and social media advertisements to promote adopting water-efficient landscapes and participating in the Landscape Rebate Program that incentivizes rain gardens, rain barrels, and cisterns, Graywater Rebate Program, and Water Wise Outdoor Survey Program Valley Water uses several methods to conduct outreach, including newspaper,					

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	social media (e.g., Facebook, Instagram, and Nextdoor), website, blogs, in-class and virtual presentations, STEAM after school programs, library programs, educational tours, community events and workshops. The variety of outreach methods ensures that many segments of the Santa Clara Valley population are being reached, including residents, businesses, students, as well as people from other locations. Additionally, Valley Water's website continues to provide updates to the community, including storm water pollution prevention messages. Our on-line maintenance request form (Access Valley Water)					

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	empowers citizens to report dumping or waterway-related problems and allows them to send messages to the appropriate watershed staff. The site also includes a link to the SCVURPPP website, where other storm water pollution prevention program materials can be found.					
C.7.c. Public Outreach and Citizen Involvement Events	The Watershed Watch booth was present at various community events. The booth included informational materials as well as a game for kids.	Five community outreach events	Four community outreach events.	Eight community outreach events.		
	SCVURPPP provided funding to Valley Water to support advertising for the 2024 Coastal Cleanup Day and the	Cleanup events held at 83 sites county-wide	Cleanup events held at 95 sites county-wide	Cleanup events held at 92 sites county-wide		

	2025 National River Cleanup Day. Valley Water provides significant support for several citizen involvement events. The Santa Clara County cleanup efforts for National River Cleanup Day and Coastal Cleanup Day are coordinated by the Creek Connections Action Group (CCAG). As the Chair of the CCAG, Valley Water provides meeting support, graphic services, cleanup supplies, and site-coordinator training. On the day of the events, Valley Water provides phone staffing, logistical support, and reports results to the California Coastal Commission during Coastal Cleanup Day and American Rivers for National River Cleanup Day. After these events, Valley Water creates and distributes outreach materials highlighting the cleanup effort.					

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	Valley Water coordinates a year-round Adopt-A-Creek Program that assists community members with creek access permits, provides resources on best practices for creek cleanups, offers cleanup supplies, and organizes trash collection services following citizen-led creek cleanups.	72 Adopt-A-Creek Cleanups	73 Adopt-A-Creek Cleanups	66 Adopt-A-Creek Cleanups		
	SCVURPPP funded the Watershed Watchers Program at the Don Edwards San Francisco Bay Wildlife Refuge which included citizen involvement and stewardship activities/events.	11 citizen involvement and stewardship programs	12 citizen involvement and stewardship activities/events	15 citizen involvement and stewardship activities/events		
	Valley Water's Education Outreach Program (EO) engaged with students, educators, and public youth through in-person classroom lessons, school assemblies, field trips and tours, and summer programs. Programs are designed to teach students about water conservation,	• 337 Water Education Programs • Four STEAM programs • Four educator workshops	• 440 Water Education Programs • Six STEAM programs • Two educator workshops • Eight field trips and tours • Three public library programs	• 501 Water Education Programs • Eight field trips and tours • Eight public library programs • Seven public tabling events		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	flood preparedness, and environmental stewardship. EO also collaborated with local environmental education agencies and youth- serving organizations to increase the number of students exposed to water education. EO provides a hard copy of "You Are the Solution to Water Pollution" brochure to all educators who receive programming. Some program activities overlap with those listed in Section C.7.e., including classroom-based water education programs, Field Trips, and Tours. Valley Water also administers a grant program which includes citizen involvement pollution prevention and education grants (Project F9 in the Safe Clean Water program). For information on the grant program, please see the Safe Clean		• Nine public tabling events			

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	Water and Natural Flood Protection Program annual report, which will be posted to https://www.valleywater.org/safe-clean-water-and-natural-flood-protection-program/safe-clean-water-program-archive.					
C.7.d. Watershed Stewardship Collaboration	SCVURPPP actively supported the Santa Clara Basin Watershed Management Initiative by participating in Santa Clara Valley Zero Litter Initiative (ZLI) and evaluated alternatives to supporting the Land Use Subgroup (LUS), e.g., the Peninsula/South Bay Watershed Forum (PSBWF).	• Two LUS meetings. • One workshop titled "Riparian Corridors Setbacks: Challenges and Benefits" Nine ZLI meetings.	• One LUS meeting. • Eight ZLI meetings.	• Two coordination meetings with PSBWF. • Seven ZLI meetings.		
C.7.e. School-Age Children Outreach	SCVURPPP provided funding to the musical group, ZunZun, to conduct educational assemblies at elementary schools.	51 ZunZun assemblies conducted at 23 elementary schools and two community events	50 ZunZun assemblies conducted at 25 elementary schools	52 ZunZun assemblies conducted at 25 elementary schools and one community event.		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	SCVURPPP funded the Watershed Watchers Program at the Don Edwards San Francisco Bay Wildlife Refuge which included interpretive events for school-age children.	Approximately 50 interpretive events	Approximately 50 interpretive events	Approximately 50 interpretive events		
	SCVURPPP conducted the Earth Day Poster Challenge for grades K-8 children.	One contest	One contest	One contest		
	The Valley Water Education Outreach Program (EO) serves school-aged children through in-person classroom lessons, school assemblies, field trips and tours, and summer programs. EO programming integrates messages and priorities of other Valley Water program areas. Programs are designed to teach students in grades TK-12 about water conservation, flood preparedness, and environmental stewardship. Some	349 school-age children outreach programs; including in-person programs (259) virtual programs (28), school assemblies (14), library programs (12), onsite tours (10), and summer camp programming (26)	• 440 classroom lessons • 9,813 students visited • 17 summer programs for students • 3 school assemblies • 8 field trips and tours	• 501 Water Education Programs • 12,832 students visited • 16 summer programs for students • 31 school assemblies • Eight field trips and tours		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	program activities overlap with those listed in Section C.7.c. including classroom-based water education programs, field trips, and tours. Valley Water's Youth Commission, a 21-member board advisory committee, with three members representing each of Valley Water's seven districts, met every quarter during FY25. The goal of the commission is to assist Valley Water's Board of Directors with "public policy, education, outreach, and all matters impacting the Santa Clara County youth and the water district" and "to foster greater involvement of youth in local government to inspire and develop future public policy leaders and professionals with an awareness of issues and activities relating to water supply, conservation flood					

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	protection and stream stewardship." Youth Commissioners have been asked to help publicize as well as participate in Valley Water cleanup efforts such as National River Cleanup Day, Coastal Cleanup Day and the Adopt-A-Creek program. Please visit the Learning Center for a more information about Education Outreach Programs and Events. – https://www.valleywater.org/learning-center/water-education-programs-and-events					
C.7.f. Outreach to Municipal Officials	SCVURPPP staff developed materials in FY 22-23 to inform municipal officials about MRP 3.0. These are available on the SCVURPPP website. No new materials were developed in FY 24-25.	N/A	N/A	0		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	A presentation on the Implementation of Green Stormwater Infrastructure in Santa Clara County was given to Valley Water Environmental and Water Resources Committee on January 27, 2025. It was coordinated by Valley Water staff and presented by SCVURPPP and City of Morgan Hill staff. Valley Water conducts regular outreach to elected officials through quarterly website updates to the Interagency Urban Runoff Program webpage at Valleywater.org and publication of the Safe, Clean Water annual report that is distributed to the Valley Water Board of Directors and available to the public at https://www.valleywater.org/safe-clean-water-and-natural-flood-protection-	N/A	N/A	1		

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
	program/safe-clean-water-program-archive. Valley Water also promotes stormwater awareness to the Valley Water CEO through CEO bulletin reports on stormwater related projects and programs and presents stormwater-related topics such as green infrastructure and stormwater resource planning to the Valley Water Board of Directors.					

C.7.g.iii.(2) ► Stormwater Pollution Prevention Education

No Change.

Section 8 - Provision C.8 Water Quality Monitoring

C.8 ►Water Quality Monitoring

State below if information is reported in a separate regional report. Municipalities can also describe below any Water Quality Monitoring activities in which they participate directly, e.g., participation in RMP workgroups, fieldwork within their jurisdictions, etc.

Summary:

Most monitoring activities required in the stormwater permit are implemented through the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP). However, Valley Water staff participates directly in SCVURPPP's Monitoring and Pollutants of Concern Ad Hoc Task Groups and monitoring projects, reviewing plans and reports; facilitating access to monitoring locations; and auditing field monitoring efforts. Staff also participates directly in the Bay Area Municipal Stormwater Collaborative (BAMSC) Monitoring and Pollutants of Concern Committee, and some activities of the RMPs Sources, Pathways, and Loadings Workgroup. For additional information on regional and countywide monitoring studies and work products, please see the C.8 Water Quality Monitoring section of the SCVURPPP Annual Report and the *Urban Creeks Monitoring Report – Water Year 2024; April 1, 2025,* available online at https://scvurppp.org/2025/04/01/urban-creeks-monitoring-report-water-year-2024/.

The Guadalupe River Watershed Mercury TMDL requires coordinated monitoring of fish in creeks and mercury loads to the San Francisco Bay by mine site and reservoir owners. Valley Water coordinated with project partners and the RWQCB to implement and complete the second 5-year phase of the Coordinated Monitoring Program for the Guadalupe River Watershed Mercury TMDL project. Valley Water partners with Santa Clara County, Midpeninsula Regional Open Space District, and Guadalupe Rubbish Disposal Company on the TMDL project. For more information on the TMDL project, visit tinyurl.com/GuadalupeMercuryTMDL. Stream fish monitoring was delayed in 2021 and 2022 due to dry conditions or water temperatures exceeding permit thresholds but resumed in June 2023 after January storms provided adequate flows and lower water temperatures. Two of the several large storms in January 2023 were sampled for mercury and methylmercury in water according to the Monitoring Plan. A Coordinated Monitoring Program Report was approved by the RWQCB and submitted in FY24.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a. ►Implement IPM Policy or Ordinance

Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?	X	**Yes**		**No**
If no, explain:				
Links to IPM policies or ordinances and IPM standard operating procedures: No Change				
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used and **suggest reasons for increases in use of pesticides that threaten water quality**, specifically organophosphates, pyrethroids, carbamates, fipronil, indoxacarb, diuron, and diamides. A separate report can be attached as evidence of your implementation.				

Trends in Quantities and Types of Pesticide Active Ingredients Used[1]

Pesticide Category and Specific Pesticide Active Ingredient Used	Amount[2] of Active Ingredient				
	FY 22-23	**FY 23-24**	**FY 24-25**	**FY 25-26**	**FY 26-27**
Organophosphates	0	0	0		
Active Ingredient Chlorpyrifos					
Active Ingredient Diazinon					
Active Ingredient Malathion					
Pyrethroids	0	0	0		
Active Ingredient Metofluthrin					
Active Ingredient Bifenthrin					
Pesticide Category and Specific Pesticide Active Ingredient Used	**Amount**				
	FY 22-23	**FY 23-24**	**FY 24-25**	**FY 25-26**	**FY 26-27**
Active Ingredient Cyfluthrin					

[1] Includes all municipal structural and landscape pesticide usage by employees and contractors.
[2] Weight or volume of the active ingredient, using same units for the product each year. Please specify units used. The active ingredients in any pesticide are listed on the label.

Active Ingredient Beta-Cyfluthrin					
Active Ingredient Cypermethrin					
Active Ingredient Deltamethrin					
Active Ingredient Esfenvalerate					
Active Ingredient Lambda-Cyhalothrin					
Active Ingredient Permethrin					
Carbamates	0	0	0		
Active Ingredient Carbaryl					
Active Ingredient Aldicarb					
Indoxacarb	0	0	0		
Diuron	0	0	0		
Diamides	0	0	0		
Active Ingredient Chlorantraniliprole					
Active Ingredient Cyantraniliprole					
Neonicotinoids	0	0	0		
Active Ingredient Imidacloprid					
Active Ingredient Acetamiprid					
Active Ingredient Dinotefuran					
Fipronil	0	0	0		

Reasons for increases in use of pesticides that threaten water quality:

N/A

IPM Tactics and Strategies Used:

The majority of pesticide use on Valley Water owned properties is herbicides for vegetation control. Specific IPM strategies implemented include:

- Increased hand pulling of invasive vegetation in lieu of herbicide application.
- Increased use of mulch to control undesired vegetation in native plant restoration sites.
- Insecticides at facilities are used after other methods, such as prevention or natural nontoxic control methods, have been shown to be ineffective in similar situations. Where use is needed, the product with the lowest toxicity is used in accordance with the manufacturer's label.
- Facilities staff avoid use of pesticides by changing the conditions, cleaning the area and removing the attractant, using traps and

baits or detractions before considering use of pesticides if needed.
- Used nest boxes to recruit barn owls as a biological control for burrowing rodents, rather than using rodenticides, along Valley Water levees, creek banks, and mitigation sites.

C.9.b ►Train Municipal Employees

Enter the number of employees that apply or use pesticides (including herbicides) within the scope of their duties.	25
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	25
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within this reporting year.	100

Type of Training/Comments:

Herbicide Label trainings held on July 25, 2024, February 6, 2025, February 25, 2025, and May 29, 2025, provided to all Vegetation Field Operations staff who apply pesticides. Additionally, all staff (those who apply herbicides and those who do not) participate in plant identification training, BMP training for the use and handling of herbicides, and calibration training for herbicide application equipment.

C.9.c ►Require Contractors to Implement IPM

Did your municipality contract with any pesticide service provider in the reporting year, for either landscaping or structural pest control?	X	**Yes**		**No**
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	X	**Yes**		**No**

If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored

Valley Water ensures contractor compliance with Integrated Pest Management (IPM) practices through a multi-step approach. Hired landscaping and pest control contractors receive a copy of Valley Water's IPM policy, and a verbal reminder of IPM practices by Vegetation Field Operations Unit staff while working on-site as needed. Contractors can only apply pesticides from the list approved by the Valley Water Pesticide Review Team, and their job reports are reviewed to verify adherence to IPM practices. Additionally, contractors are required to notify Valley Water of any proposed changes to their application or eradication methods.

If your agency did not evaluate the contractor's list of pesticides and amounts of active ingredients used, provide an explanation here.

N/A

C.9.d ►Interface with County Agricultural Commissioners

How did your municipality communicate with the County Agricultural Commissioner to: (a) get input and assistance on urban pest management practices and use of pesticides or (b) inform them of water quality issues related to pesticides?

See Section 9 of the SCVURPPP FY 24-25 Annual Report for summary of communication with the Santa Clara County Agricultural Commissioner.

Did your municipality report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire?		**Yes**	X	**No**

If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary.

N/A

C.9.e.ii (1) ►Public Outreach: Point of Purchase

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); **OR** reference a report of a regional effort for public outreach in which your agency participates.

Summary:
See the C.9 Pesticides Toxicity Control section of the SCVURPPP FY 24-25 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

C.9.e.ii (2) ►Public Outreach: Pest Control Contracting Outreach

Provide a summary of outreach to residents who use or contract for structural pest control and landscape professionals); **AND/OR** reference a report of a regional effort for outreach to residents who hire pest control and landscape professionals in which your agency participates.

Summary:
See Section 7 and Section 9 of the SCVURPPP FY 24-25 Annual Report for a summary of outreach to residents and businesses that use or hire structural pest control and landscape professionals. In addition, see the FY 24-25 Watershed Watch Campaign Final Report included within Section 7 of the SCVURPPP FY 24-25 Annual Report.

C.9.e.ii.(3) ►Public Outreach: Pest Control Operators

Provide a summary of public outreach to pest control operators and landscapers and reduced pesticide use (here or in a separate report); **AND/OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary:

See the C.9 Pesticides Toxicity Control section of the SCVURPPP FY 24-25 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use.

C.9.f ►Track and Participate in Relevant Regulatory Processes

Summarize participation efforts, information submitted, and how regulatory actions were affected; **AND/OR** reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.

Summary:

During FY 24-25, Valley Water participated in regulatory processes related to pesticides through contributions to SCVURPPP and CASQA. For additional information, see the Pesticide Annual Report prepared by CASQA in the SCVURPPP 24-25 Annual Report.

C.9.g.iii ►Evaluate Implementation of Pesticide Source Control Actions

(For the FY 24-25 Annual Report Only) Submit an evaluation of Pesticide Source Control actions, including an assessment of the effectiveness of IPM efforts, a discussion of any improvements made in the preceding five years, and any changes in water quality in urban creeks. Also include a brief description of one or more pesticide-related areas the permittee will focus on enhancing in the next permit term.

Summary:

See Section C.9 Pesticides Toxicity Control of the SCVURPPP FY 24-25 Annual Report for a report that includes the following:

- An evaluation of the effectiveness of source control measures implemented;
- Changes in water quality regarding pesticide toxicity in urban creeks;
- Improvements made to (name of agency)'s IPM Program in the past five years; and
- Pesticide-related area(s) that (name of agency) will focus on enhancing during the next permit term.

Section 10 – Provision C.10 Trash Load Reduction

C.10.a.i ► Trash Load Reduction Summary

For population-based Permittees, provide the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High, or Moderate trash generation). Base the reduction percentage on the information presented in C.10.b i-v and C.10.f.i-ii. Provide a discussion of the calculation used to produce the reduction percentage.

Trash Load Reductions	
Percent Reduction in All Trash Management Areas (TMAs) due to **Full Trash Capture Systems** (as reported C.10.b.i)[1]	N/A
Percent Reduction in all TMAs due to **Control Measures Other than Full Trash Capture Systems** (as reported in C.10.a.ii(b) & C.10.b.iii)[1,2,]	N/A
Subtotal for Above Actions	**N/A**
Trash Reduction Credits and Offsets (Optional)	
Reduction Credits due to **Jurisdictional-wide Source Control Actions** (as reported in C.10.b.v)[3]	--
Reduction Offset Associated with **Additional Creek and Shoreline Cleanups** (as reported in C.10.f.i)	--
Reduction Offset Associated with **Direct Trash Discharge Controls** (as reported in C.10.f.ii)	--
Total (Jurisdiction-wide) % Trash Load Reduction through FY 2024-25	**N/A**

[1] See Appendix 10-1 for changes between 2009 and FY 24-25 in trash generation by TMA as a result of Full Capture Systems and Other Trash Control Measures.
[2] This percentage includes reductions associated with other trash controls implemented to address moderate, high or very high trash generating areas in the public right-of-way and on applicable private lands.
[3] To claim a load percentage reduction value, Permittees must provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and reduce trash by the claimed value. Permittees who have not implemented an approved Direct Discharge Control Plan (DDCP) may no longer claim source control actions implemented under previous Permits (i.e., foam foodware and single-use plastic bags).

C.10.a.i ► Trash Load Reduction Summary (Continued)

State (Y/N) if your agency has: 1) been granted additional time to meet the 100% compliance benchmark; 2) met the 100% compliance benchmark as on June 30, 2025; and/or 3) submitted a notice of non-compliance and an updated Long-term Trash Load Reduction Plan in accordance with Permit Provision C.10.d.ii.

1. Was your agency **granted additional time** until December 31, 2025 or June 30, 2026[4] to meet the 100% compliance benchmark because your agency developed and implemented an approved direct discharge control plan (DDCP) as described in Provision C.10.f.ii.?	☐ Yes	☒ N/A	☐ No
2. Did your agency **meet the 100% trash load reduction benchmark** as of June 30, 2025? Mark N/A if your agency marked "Yes" to question #1.	☐ Yes	☐ No	☒ X NA
3. If your agency **checked "No" to question #2**, did your agency submit a notice of non-compliance and develop and submit an updated Trash Load Reduction Plan by June 30, 2025? Mark N/A if your agency marked "Yes" to question #1 or #2. If your agency marks "No" to this question, provide additional details below regarding why your agency did not submit an updated Trash Load Reduction Plan by June 30, 2025.	☐ Yes	☐ No	☒ X NA

Discussion of Permittee Trash Load Reduction and the Load Reduction Calculation:

Percent trash reduction requirements are not applicable to Valley Water per the Municipal Regional Permit.

[4] East Contra Costa County Permittees have until June 30, 2026 to achieve 100 % via full trash capture, or equivalent, contingent on developing and implementing a Direct Discharge Control Plan (DDCP) as described in Provision C.10.f.ii.

C.10.a.ii(a) ► Full Trash Capture Systems – Population-based Permittees
C.10.c ► Full Trash Capture Systems – Flood Management Agencies

Provide the following:

1) Total number and types of full capture systems (publicly and privately-owned) installed during FY 24-25, and prior to FY 24-25, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3.
2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for flood management agencies compared to the total required by the permit.

Type of System	# of Systems	Areas Treated (Acres)
Installed in FY 24-25		
None	--	--
Installed Prior to FY 24-25		
Trash Booms (Adobe Creek, Matadero Creek, Lower Silver Creek, Thompson Creek)	4	N/A
Total for all Devices or Systems Installed To Date	**4**	**N/A**
Total # of Systems Required by Permit (Flood Management Agencies)		**4**

C.10.a.ii(b) ►Trash Generation Area Management – Private Lands

Provide a summary of implementation actions and progress towards meeting the July 1, 2025 requirement for all private lands that are moderate, high, or very high trash generating, and that drain to storm drain inlets that Permittees do not own or operate (private), but that are plumbed to Permittees' storm drain systems. Include descriptions of any trash control measures implemented, or caused to be implemented, by your agency, including full trash capture systems and/or trash discharge control actions equivalent to or better than full trash capture systems. For trash discharge control actions equivalent to or better than full trash capture systems that were implemented on private lands, summarize the methods used to demonstrate that trash discharges are controlled and the extent to which these methods were implemented in FY 24-25.

Summary of Implementation Actions and Trash Load Reduction Progress:

N/A

C.10.b.i and ii ► Trash Reduction – Full Capture Systems

Provide the following:
1) Jurisdiction-wide trash reduction in FY 24-25 attributable to full capture systems implemented in each TMA;
2) The total number of full capture systems installed to-date in your jurisdiction;
3) The percentage of systems in FY 24-25 that exhibited significant plugged/blinded screens or were ≥50% full when inspected or maintained;
4) A narrative summary of any maintenance issues and the corrective actions taken to avoid future performance issues; and
5) A certification that each full capture system is operated and maintained to meet full capture system requirements in the permit.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or ≥ 50% full in FY 24-25
N/A	N/A	N/A	N/A
Total	**N/A**		

Summary of Maintenance Issues and Corrective Actions
N/A

Certification Statement:
Trash reduction specifics are not applicable to Valley Water other than the installation of four (4) trash booms in Santa Clara County, as required in Provision C.10.c.

During FY 24-25, the following amounts of trash were removed from each trash boom:

Adobe Creek: 0.37 cubic yards (75 gallons) on 12/21/2024, 1.42 cubic yards (287 gallons) on 3/22/2025, 0.07 cubic yards (15 gallons) on 5/17/2025

Matadero Creek: 0.12 cubic yards (25 gallons) on 12/21/2024, 0.25 cubic yards (50 gallons) on 3/22/2025, 0.15 cubic yards (30 gallons) on 5/17/2025

Lower Silver Creek*: 3 cubic yards on 12/27/2024

Thompson Creek: 4 cubic yards on 12/26/2024, 7 cubic yards on 12/27/2024

*In February 2025, the Lower Silver boom ripped apart at one end, potentially due to a combination of previous vandalism and age. New booms were ordered to replace the broken one at Lower Silver Creek and replace the aging one at Thompson Creek. The Lower Silver boom was replaced in June 2025, and the Thompson boom is scheduled to be replaced in FY 25-26.

Did your agency provide the names and locations of new and existing full trash capture systems to the County vector control agency for FY 24-25? ☐ **Yes** ☐ **No** ☒ **N/A**

C.10.b.iii(a) ► Trash Reduction – Other Trash Management Actions
C.10.c ► Requirements for Flood Control Agencies

Provide a summary of trash control actions other than full capture systems, jurisdictional source controls, and trash control actions on private lands that were implemented within each TMA in FY 24-25, including the types of actions, levels, timing, frequency, and areal extent of implementation, whether actions are new, including initiation date, and information relevant to effective implementation of the action or combination of actions.

TMA	Summary of Trash Control Actions Other than Full Capture Systems
Guadalupe Watershed	When public recreational paths, trails, or trailheads are established on Valley Water property, Valley Water enters into Joint Trail Agreements and Collaboration Action Plans (JTA/CAP) with the city that has local jurisdiction. Through these agreements, the cities assume responsibility for managing litter cans and controlling recreation-generated litter, while Valley Water addresses flow or encampment-related accumulations of trash and debris through priority projects described below. While Valley Water does not operate and maintain an MS4, trash control actions (i.e., trash collection and removal) are conducted within Valley Water properties annually under the Safe Clean Water and Natural Flood Protection (Safe Clean Water), Good Neighbor Program Priority Projects F5 (Encampment Cleanups) and F6 (Graffiti and Litter Removal). Both projects have been implemented since Safe Clean Water was created in 2012. Priority F5 has a key performance indicator (KPI) to manage 300 acres annually to clean up trash, debris, and hazardous pollutants generated from encampments and to reduce the amount of these pollutants entering streams. Priority F6 includes a KPI to cleanup identified trash and graffiti hotspots at approximately 80 sites four times per year and respond to requests on litter or graffiti cleanup within five (5) working days. These KPIs were met or exceeded in FY24. The final SCW report will be published in October 2025. Additionally, Valley Water provides grants under Safe Clean Water Priority F9 to support volunteer cleanups and education or partnership efforts; and is the Chair of the Creek Connections Action Group (CCAG), which provides significant support for National River Cleanup Day and Coastal Cleanup Day. In FY24 Safe Clean Water Priority Projects F5 and F6 removed 8,225 CY of trash from Guadalupe River Watershed. Preliminary data for FY25 Safe Clean Water Priority Projects shows 5,042 CY of trash removed from Guadalupe River Watershed. Final FY25 totals will be shared in FY26 report.
Coyote Watershed	See summary above. In FY24 Safe Clean Water Priority Projects F5 and F6 removed 4,822 CY of trash from Coyote Creek Watershed. Preliminary data for FY25 Safe Clean Water Priority Projects shows 3,730 CY of trash removed from Coyote Creek Watershed. Final FY25 totals will be shared in FY26 report.
Lower Peninsula/West Valley Watershed	See summary above. In FY24 Safe Clean Water Priority Projects F5 and F6 removed 1,543 CY of trash from Lower Peninsula/West Valley Watershed. Preliminary data for FY25 Safe Clean Water Priority Projects shows 933 CY of trash removed from Lower Peninsula/West Valley Watershed. Final FY25 totals will be shared in FY26 report.

Uvas-Llagas Watershed (outside of SFBRWQCB Region)	See summary above. In FY24 Safe Clean Water Priority Projects F5 and F6 removed 1,508 CY of trash from Uvas-Llagas Watershed. Preliminary data for FY25 Safe Clean Water Priority Projects shows 1,443 CY of trash removed from Uvas/Llagas Watershed. Final FY25 totals will be shared in FY26 report.

C.10.b.iii(b) ► Trash Reduction – Other Trash Management Actions

Provide the following:

1) A summary of the on-land visual assessments conducted in each TMA to demonstrate improvements in the levels of trash generation associated with the public right-of-way, including the street miles available for assessment (i.e., those associated with VH, H, or M trash generation areas not treated by full capture systems), the street miles assessed, the % of available street miles assessed, and the average number of assessments conducted per site within the TMA; and
2) Percent jurisdictional-wide trash reduction in FY 24-25 attributable to trash management actions other than full capture systems that have been implemented to address trash generation associated with the public right-of-way in each TMA; OR
3) Indicate that no on-land visual assessments were performed.

If no on-land visual assessments were performed in a TMA, check here **and state why:**	X	**Explanation:** N/A

TMA ID or *(as applicable)* Control Measure Area	**Total Street Miles[5] Available for Assessment**	**Summary of On-land Visual Assessments**			**Jurisdictional-wide Reduction (%)**
		Street Miles Assessed	**% of Available Street Miles Assessed**	**Avg. # of Assessments Conducted at Each Site**	
N/A	N/A	N/A	N/A	N/A	N/A
Total		**N/A**	**N/A**	**N/A**	**N/A**

[5] Street miles are defined as the street length and do not include street median curbs.

C.10.d ►Long-Term Trash Load Reduction Plan

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014 or (if applicable) to your Updated Long-term Trash Load Reduction Plan submitted in 2023 in response to the 90% benchmark. Describe significant changes made to trash management areas (TMA), baseline trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your baseline trash generation map was revised and, if so, what information was collected to support the revision. If your baseline trash generation map was revised, attach it to your Annual Report and/or provide a link to your map.

Description of Significant Revision	Associated TMA
N/A	N/A

C.10.b.v ► Trash Reduction – Source Controls

Provide a description of each jurisdiction-wide trash source control action implemented to date other than those addressed under previous Permits (i.e., foam foodware and single-use plastic bags). For each new control action, identify the trash reduction evaluation method(s) used to demonstrate on-going reductions, summarize the results of the evaluation(s), and estimate the associated reduction of trash within your jurisdictional area. Note: There is a maximum of 10% total credit for source controls.

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction
N/A	N/A	N/A	N/A	N/A

C.10.f.i ► Trash Reduction Offsets – Creek and Shoreline Cleanups

Provide a summary description of creek and shoreline cleanups conducted during FY 24-25 and the water quality benefit achieved. Include information that is sufficient to demonstrate sustained improvement of the creek or shoreline area, the volume of trash removed, and the offset claimed in FY 24-25. Provide the number and frequency of cleanups conducted, locations and cleanup dates.

Offset Program	Summary Description of Cleanup Actions and the Benefit of Water Quality Achieved	Volume of Trash (CY) Removed/Controlled in FY 24-25	Offset (% Jurisdiction-wide Reduction)
Additional Creek and Shoreline Cleanups (Max 10% Offset)	N/A	N/A	N/A

C.10.f.ii ► Trash Reduction Offsets – Direct Trash Discharge Controls

For those Permittees with a DDCP approved by the Water Board Executive Officer, provide a summary description of the trash controls implemented, the volume of trash removed via the DDCP, and the offset claimed in FY 24-25. Attach a report that includes the following:

- For Permittees whose DDCPs address significant discharges from **unsheltered homeless populations**, include a narrative description and quantitative information for the following for FY 24-25 and for each prior year of the permit term:
    - The estimated number of people experiencing unsheltered homelessness in their jurisdiction;
    - the estimated number of people experiencing unsheltered homelessness living within approximately 500 feet of receiving waters;
    - the estimated portion of those populations provided housing as described in Provision C.10.f.ii.b.(i);
    - the estimated portion of those populations served with the services described in Provision C.10.f.ii.b.(i);
    - the number and scope of sanitation controls and services provided to homeless encampments;
    - the number and scope of trash controls and services provided to homeless encampments; and
    - the number and scope of sanitary cleanouts and other services provided to RVs.

- For Permittees whose DDCPs address significant discharges from **illegal dumping sites**, include a narrative description and quantitative information for the following for FY 24-25 and for each prior year of the permit term:
    - The total number of active illegal dumping sites;
    - the number of active illegal dumping sites within approximately 500 feet of receiving waters;
    - the number of illegal dumping sites where trash was collected, and the amount of material collected;
    - dumping vouchers (or equivalent) provided (and who they are provided to);
    - dumping vouchers (or equivalent) used; and
    - outreach and education provided to the public regarding illegal dumping and the availability of dumping vouchers (or equivalent).

- For Permittees whose DDCPs address significant discharges from **both unsheltered homeless populations and illegal dumping sites**, include a narrative description and quantitative information for all the elements listed above for the FY 24-25 and for each prior year of the permit term.

Offset Program	Summary Description of Actions and Assessment Results	Volume of Trash (CY) Removed/Controlled in FY 24-25	Offset (% Jurisdiction-wide Reduction)
Direct Trash Discharge Controls (Max 15% Offset)	N/A	N/A	N/A

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 24-25.

TMA	2009 Baseline Trash Generation[6] (Acres)					Trash Generation (Acres) in FY 24-25 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 24-25 After Accounting for Full Capture Systems and Other Control Measures[7]					Jurisdiction-wide Reduction via Other Control Measures (%)[7]	Jurisdiction-wide Reduction via Full Capture AND Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Totals	**Please note, N/A due to no TMAs. Percent trash reduction requirements are not applicable to Valley Water per the Municipal Regional Permit.**																	

[6] 2009 baseline trash generation (acres) incorporates any refinements made subsequent to 2009 to baseline based on new and more accurate information.
[7] Acreage changes and percent reductions reported here include those associated with other trash controls implemented to address moderate, high or very high trash generating areas in the public right-of-way and on applicable private lands.

Section 11 – Provision C.11 Mercury Controls

C.11.a ► Assess Mercury Load Reductions from Stormwater

Submit documentation confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

In addition to the SCVURPPP activities, Valley Water addresses mercury as follows:
Valley Water owns and operates three reservoirs (Almaden, Calero, and Guadalupe reservoirs) and one lake (Lake Almaden) within the Guadalupe River Watershed that were included in the Clean Water Act (CWA) Section 303 (d) list as impaired due to mercury in 1999. A Basin Plan amendment, adopted in 2008 by the SFBRWQCB, established new water quality objectives and Total Maximum Daily Loads (TMDLs) for mercury in the Guadalupe River Watershed. In the Guadalupe River Watershed Mercury TMDL (Guadalupe TMDL), it is recognized that Valley Water initiated voluntary applied studies in these water bodies prior to its adoption, and that the continuation of these studies is one means of compliance with regulations pursuant to the Guadalupe TMDL. Valley Water's mercury reduction activities are implemented under its Impaired Water Bodies Improvement Project (Priority B, Project B1) within the Safe, Clean Water and Natural Flood Protection Program.

Inorganic mercury enters the reservoirs from the lands draining historic mercury mines in the upper Guadalupe River Watershed, atmospheric deposition, and water imported to Calero Reservoir. Methylmercury (the bio-available form of mercury) is produced in the reservoirs and in Lake Almaden during the warm summer months through processes related to the seasonal depletion of bottom water oxygen.

Valley Water has installed hypolimnetic oxygenation systems (HOS) at Calero Reservoir, Stevens Creek Reservoir, Guadalupe Reservoir, and Almaden Reservoir to suppress hypolimnetic methylmercury production. Although effective for reducing hypolimnetic methylmercury, the systems increase the temperature of reservoir releases, and may also contribute to algae blooms, especially under drought or low water conditions. HOSs were operated at Almaden and Calero Reservoirs in Summer 2024. HOS were not operated in Guadalupe or Stevens Creek Reservoirs to preserve cold water for downstream salmonids.

The Guadalupe River Watershed Mercury TMDL establishes an implementation schedule for reservoir treatment controls and includes new water quality objectives for mercury in fish tissue and surface water to be achieved by meeting target reductions of seasonal maximum methylmercury concentrations in the four reservoirs. Valley Water has implemented treatment controls on schedule in all the above-mentioned water bodies. Hypolimnetic oxygenation has been effective for reducing hypolimnetic methyl mercury, but fish tissue concentrations remain high. For this reason and owing to the negative side-effects of hypolimnetic oxygenation using line diffusers, Valley Water has entered into cost sharing agreements with UC Merced, UC Davis, and UC Santa Cruz to explore alternative methods to reduce methylmercury in water and fish in collaboration with Regional Water Quality Control Board staff.

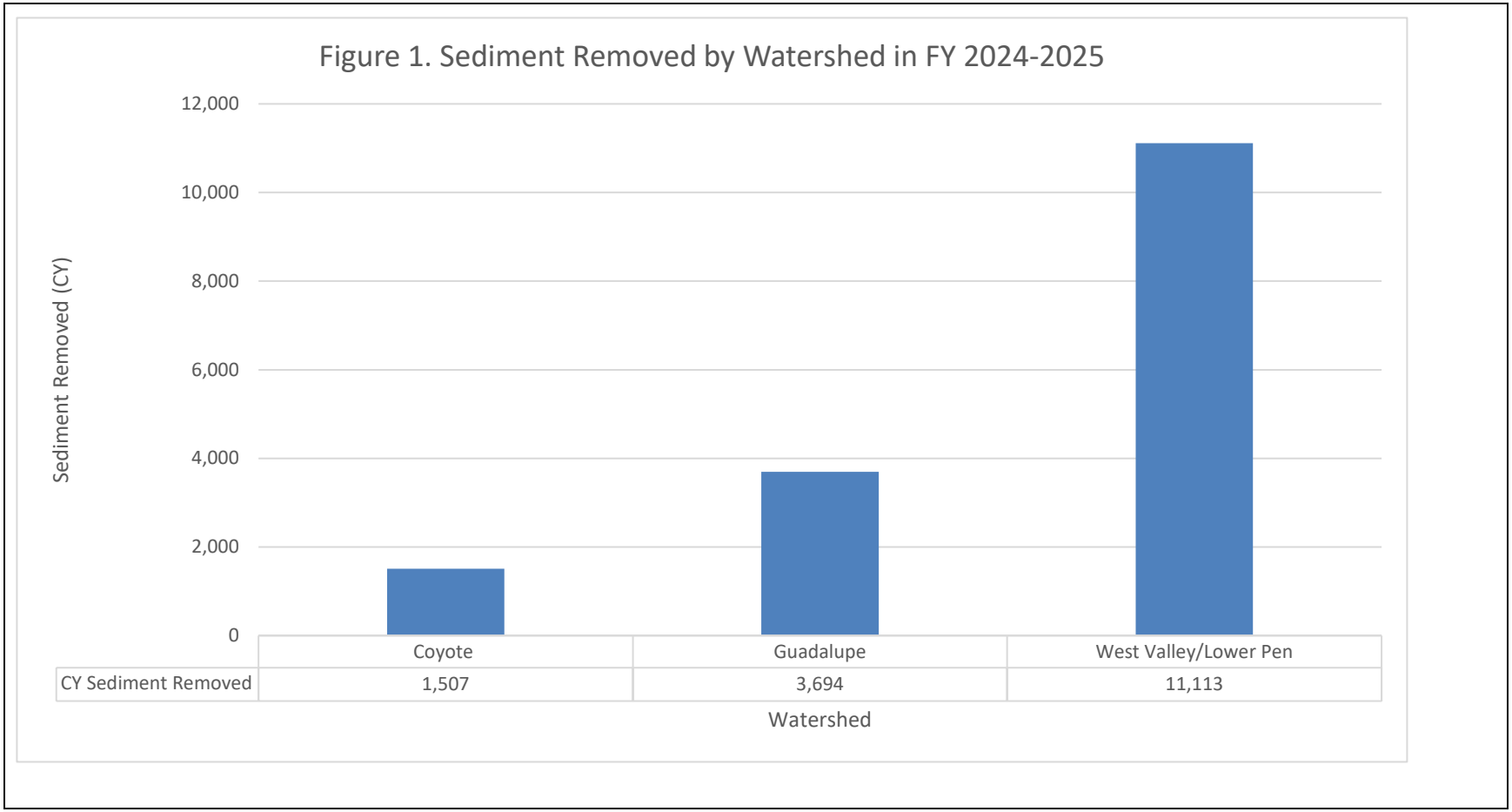
Valley Water also coordinated with project partners (County of Santa Clara, Midpeninsula Regional Open Space District, and Guadalupe Rubbish Disposal Company) and the RWQCB to complete implementation of the second 5-year phase of the Coordinated Monitoring Program for the Guadalupe River Watershed Mercury TMDL project. Valley Water managed a contract with Tetra Tech to monitor wet season mercury loading

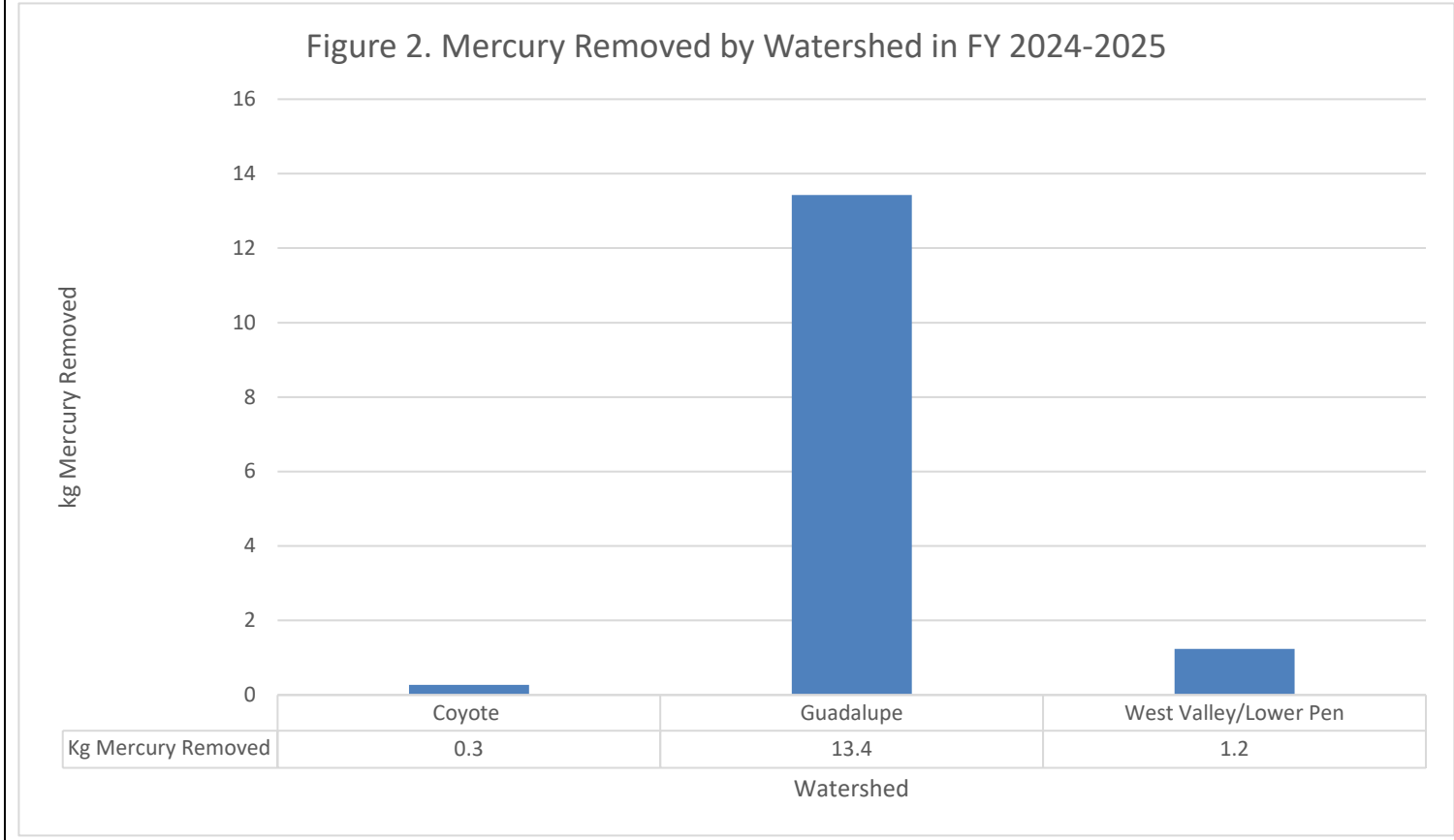
and in stream fish monitoring. Tetra Tech completed mercury load monitoring in Guadalupe River at Highway 101 during two large storms in winter 2023 and fish monitoring in spring 2023. A final report was submitted to the Water Board in May 2024.

In April and May 2025, Valley Water completed reservoir fish monitoring at Almaden, Calero, Guadalupe, and Stevens Creek reservoirs. Fish tissue and water quality information are reported in biennial progress reports. For more information on this program and the biennial reports submitted to the SFBRWQCB please see https://www.valleywater.org/project-updates/grants-and-environmental-protection/B1-impaired-water-bodies-improvement.

As part of its Stream Maintenance Program (SMP), Valley Water removes sediment in channels and creeks to reduce the potential for local flooding and to meet the requirements of the Federal Emergency Management Agency for flood protection. Valley Water analyzes the sediments for various constituents, including for total mercury, to effectively plan for disposal or beneficial reuse and assist with determining the best management practices to avoid and minimize impacts to water quality and aquatic life during sediment removal and disposal. Sediment removal opportunistically removes mercury from the watershed.

During FY 24-25 Valley Water removed 1,507cubic yards (CY) of sediment from the Coyote Watershed, 3,694 CY from the Guadalupe Watershed, and 11,113 CY from the West Valley/Lower Peninsula Watershed (Figure1). Total mercury removed by watershed is shown in Figure 2. Using measured sediment mercury concentrations, this translates to a total of 14.9 kg of mercury removed from all watersheds flowing to San Francisco Bay (0.27 kg from Coyote Watershed, 13.431 kg from Guadalupe Watershed, and 1.24 kg from West Valley/ Lower Peninsula Watersheds).





C.11.b.iii (1), (2) ► Program for Source Property Identification and Abatement

Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of old industrial land uses. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement). Permittees shall submit all supporting data and information including referral reports.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

Report on ongoing O&M activities associated with all past contaminated property referrals. Prior to all new referrals, Permittees shall submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.11.c.iii (2) ► Program for Control Measure Implementation in Old Industrial Areas

Submit an account of control measure and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.11.d.iii (1) ► Mercury Collection and Recycling Implemented throughout the Region

Report on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of those recycling efforts. Report on the mass of mercury-containing material collected throughout the region along with an estimate of the mass of mercury contained in recycled material using the methodology contained in load reduction accounting system described and cited in the Fact Sheet.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the Program's FY 24-25 Annual Report.

C.11.h ► Implement a Risk Reduction Program

Report on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.

A summary of Program and regional accomplishments for this sub-provision, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish, is included in SCVURPPP's FY 24-25 Annual Report.

Valley Water is partnering with Santa Clara County Parks to install water body-specific consumption advisory signs. Although these signs do not advise on consumption of Bay fish, they raise general awareness so that anglers may seek similar consumption guidance when fishing in the Bay.

Section 12 – Provision C.12 PCBs Controls

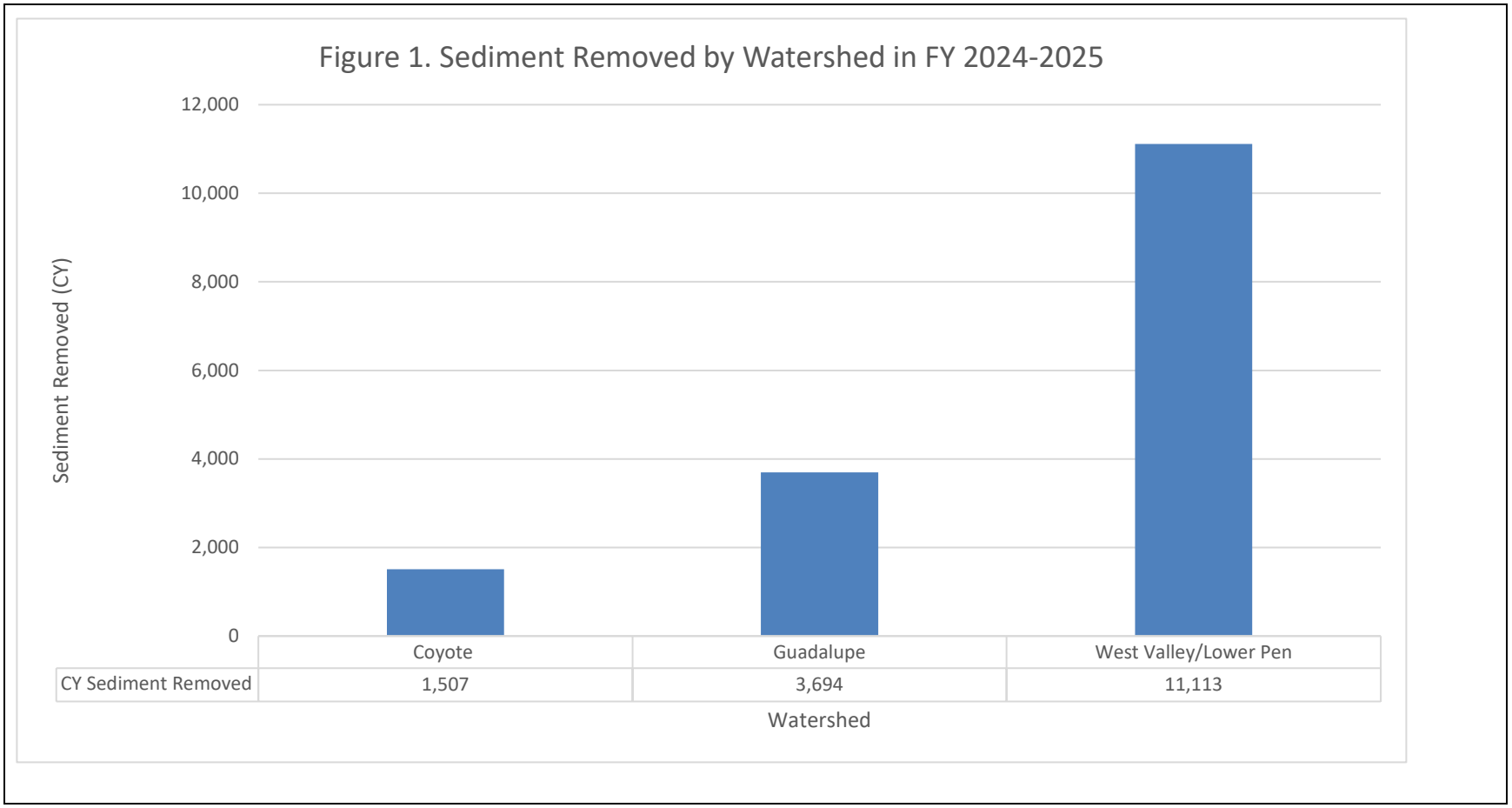
C.12.a.iii.(1) ► Assess PCBs Load Reductions from Stormwater

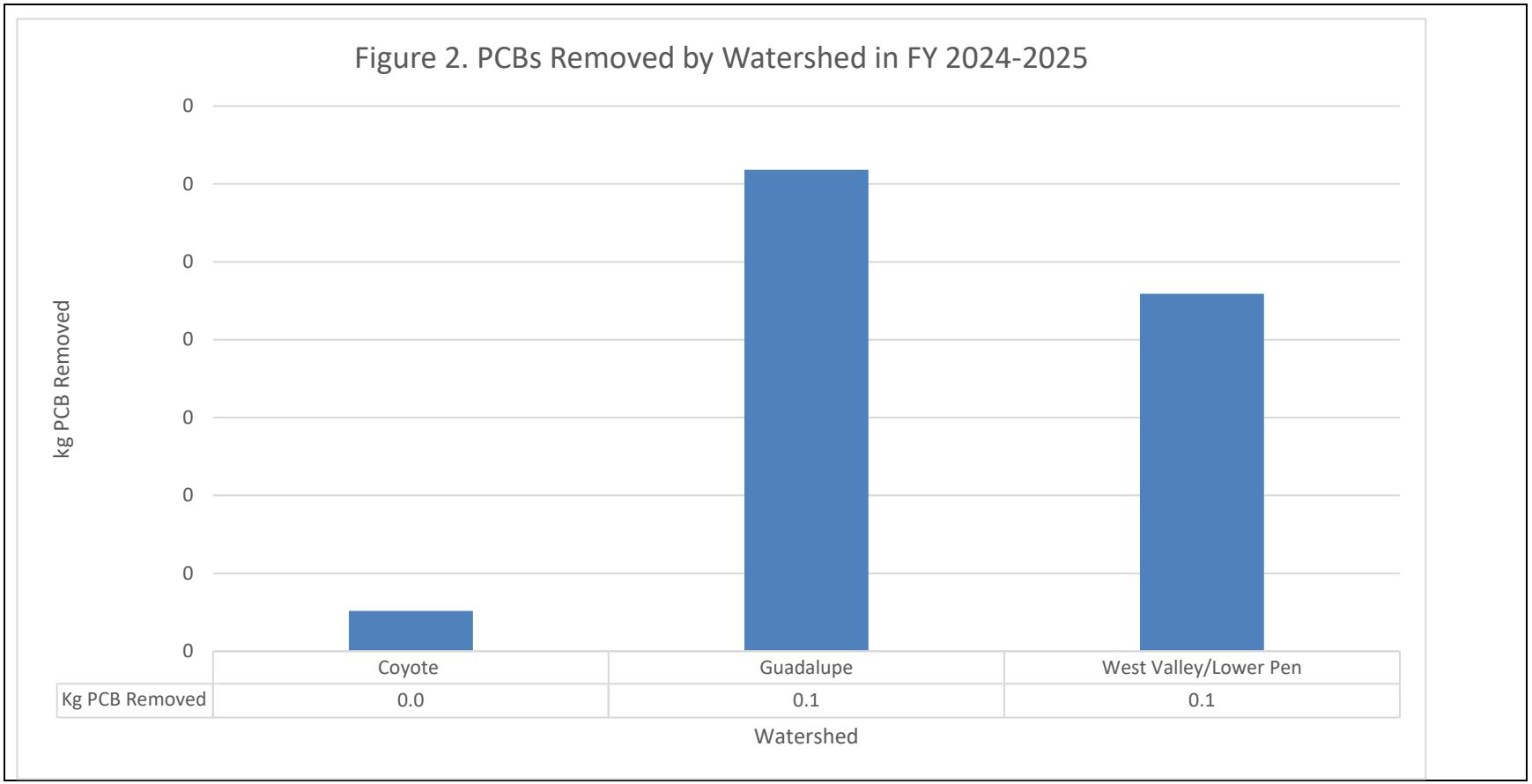
Submit documentation confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

See the SCVURPPP Mercury and PCBs Control Measures Update Report attached to the SCVURPPP FY 24-25 Annual Report.

As part of its Stream Maintenance Program (SMP), Valley Water removes sediment in channels and creeks to reduce the potential for local flooding and to meet the requirements of the Federal Emergency Management Agency for flood protection. Valley Water analyzes the sediments for various constituents, including for total PCBs, to effectively plan for disposal or beneficial reuse and assist with determining the best management practices to avoid and minimize impacts to water quality and aquatic life during sediment removal and disposal. Sediment removal opportunistically removes PCBs from the watershed.

During FY 24-25 Valley Water removed 1,507 cubic yards (CY) of sediment from the Coyote Watershed, 3,694 CY from the Guadalupe Watershed, and 11,113 CY from the West Valley/Lower Peninsula Watershed (Figure 1). Using measured sediment PCB concentrations, this translates to approximately 0.226 kg of PCBs removed from all watersheds draining to San Francisco Bay (0.01 kg from Coyote Watershed, 0.124 kg from Guadalupe Watershed, and 0.092 kg from the West Valley/Lower Peninsula Watershed). PCBs removed by watershed is shown in Figure 2.





C.12.b.iii.(1), (2) ► Program for Source Property Identification and Abatement

C.12.b.iii.(1). Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of old industrial land uses. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement). Permittees shall submit all supporting data and information including referral reports.

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.b.iii.(2). Report on ongoing O&M activities associated with all past contaminated property referrals. Prior to all new referrals, Permittees shall submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.c.iii.(2) ► Program for Control Measure Implementation in Old Industrial Areas

Submit an account of control measures and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.

Summary:
See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.d.iii.(1), (3) ► Program for Controlling PCBs from Bridges and Overpasses

C.12.d.iii.(1). In the 2022 Annual Report or the Annual Report immediately following availability of the specification, include a description of the Caltrans specification for managing PCBs-containing materials in bridge or roadway expansion joints during roadway replacement or repair.

Summary:
The Caltrans specification was not available to be implemented during FY 24-25. See Section 11 of the SCVURPPP FY 24-25 Annual Report for a description of the proposed method to address PCBs in bridges and overpasses in the absence of a Caltrans specification.

C.12.d.iii.(3). Submit documentation confirming the use of the Caltrans specification (once it is available) during all instances of bridge roadway replacement or repair in their jurisdiction during the reporting year and provide an estimate of the volume of material managed and total PCBs mass load reduced resulting from implementation of the specification.

Summary:
The Caltrans specification was not available to be implemented during FY 24-25.

C.12.e.iii.(4) ► Program for Controlling PCBs from Electrical Utilities

Does your municipality own an electrical utility? If yes, follow the directions below.		**Yes**	X	**No**

C.12.e.iii.(4). Submit a summary of the actions undertaken during the FY 24-25 that remove municipally owned PCBs-containing OFEE along with loads avoided and the details of the calculations and assumptions used to estimate the load reduced.

Summary:
We do not own an electrical utility.

C.12.g.iii.(1), (3), (4) ► Manage PCB-Containing Materials and Wastes During Building Demolition Activities

C.12.g.iii.(1). Did your agency obtain an exemption in FY 22-23 from Provision C.12.g requirements? If Yes, skip the remainder of this C.12.g section.		**Yes**	N/A	**No**

C.12.g.iii.(3)(a),(b),(c) and (d). Provide the following:

(a) The number of applicable structures that applied for a demolition permit during the reporting year;
(b) A running list of the applicable structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, and the concentration of PCBs in each sample;
(c) The project address, the demolition date, and a brief description of the PCBs-containing materials for each applicable structure with a PCBs concentration 50 mg/kg or greater; and
(d) The address, date building was constructed, and date of demolition for each structure that was constructed or remodeled between the years 1950 and 1980 and requires emergency demolition to protect public health and/or safety.

Not Applicable to Valley Water. See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.g.iii.(4). For active demolition sites in FY 24-25 with structures with PCBs concentrations ≥ 50 ppm, list the project address and demolition date, describe the PCBs-containing materials, state whether the site was inspected during demolition, and provide the hazardous waste manifest prepared for transportation of material to a disposal facility for those cases where notification and advance approval from U.S. EPA is not required and were approved for demolition after June 30, 2023.

Not applicable to Valley Water.

Site Address	**Was this site inspected during demolition? (Yes/No)**	**If this site was approved for demolition after June 30, 2023 and did not require notification to and advanced approval from EPA, attach the hazardous waste manifest and indicate it is attached.**
N/A	N/A	N/A

C.12.j.iii. ►Implement a Risk Reduction Program

Report on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.
A summary of Program and regional accomplishments for this sub-provision, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish, is included in the SCVURPPP FY 24-25 Annual Report.

Section 13 – Provision C.13 Copper Controls

C.13.a.iii (3) ► Manage Waste Generated from Cleaning and Treating of Copper Architectural Features

Provide summaries of permitting and enforcement activities to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction.

Summary:
Not applicable.

C.13.b.iii (3) ► Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals

Provide summaries of any enforcement activities related to copper-containing discharges from pools, spas, and fountains.

Summary:
Not applicable.

C.13.c.iii ►Industrial Sources Copper Reduction Results

Based upon inspection activities conducted under Provision C.4, highlight copper reduction results achieved among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed.

Summary:
Not applicable as Valley Water is not the local industrial site permitting agency.

Section 14 – Provision C.14 Bacteria Control for Impaired Water Bodies

C.14.a.i. Municipal Operations Bacteria Control
Describe the BMPs, frequency and location for actions taken to reduce bacteria sources related to municipal operations.
Not applicable to Valley Water.

C.14.a.ii. Industrial/Commercial Site Bacteria Control and Illicit Discharge Detection and Elimination
Describe the BMPs, frequency, and location for actions taken to reduce bacteria sources related to Industrial and Commercial Site Bacteria Control and Illicit Discharge Detection and Elimination.
Not applicable to Valley Water.

C.14.a.iii. ► Control of Bacteria Sources Related to Unsheltered Homeless Populations
Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria discharges from areas inhabited by unsheltered persons
Not applicable to Valley Water.

C.14.a.iv. Pet and Livestock Bacteria Source Control
Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria from domestic animal sources.
Not applicable to Valley Water.

C.14.a.v. Public Outreach on Bacteria Source Control
Describe the outreach messages, methods of delivery, audiences, and number of repetitions.
Not applicable to Valley Water.

C.14.a.vi. ► Coordination with Sanitary Sewerage System Entities
Describe the status of any actions taken to coordinate with sanitary sewer entities.
Not applicable to Valley Water.

C.14.a.vii. ► Prioritize Trash Removal to Control Bacteria Sources
Describe how the bacteria-reduction benefit of focused trash-control efforts was evaluated, the conclusions reached, and any actions taken during the reporting period to reprioritize trash control areas.
Not applicable to Valley Water.

C.14.a.viii. ► Water Quality Monitoring
Submit the results of all monitoring conducted the previous year, including parameters analyzed, frequencies, and locations, and planned monitoring for the current year, including parameters, frequencies, and locations.
Not applicable to Valley Water.

C.14.c.i.(3) ► Control Measures to Achieve Indicator Bacteria Wasteload Allocations

Summarize the actions taken to satisfy the requirements in Provision C.14.c.i.(2) between October 1, 2023 and September 30, 2024. This report shall include:

(a) The number, type, and locations and/or frequency (if applicable) of control measures;

(b) The description and scope of pollution prevention measures; and

(c) A data table and graphs showing *Enterococcus* data collected during the reporting year for the two San Mateo Lagoon beaches, Parkside Aquatic Park Beach and Lakeshore Park Beach.

Not applicable to Valley Water.

C.14.c.ii.(3) ► Phase Two Measures

Summarize the actions taken to satisfy the requirements in Provision C.14.c.ii.(2) between October 1, 2023 and September 30, 2024. This report shall include:

(a) The number, type, and locations and/or frequency (if applicable) of control measures;

(b) The description and scope of pollution prevention measures; and

(c) A data table and graphs showing *Enterococcus* data collected during the reporting year for the two San Mateo Lagoon beaches, Parkside Aquatic Park Beach and Lakeshore Park Beach.

Not applicable to Valley Water.

Section 15 – Provision C.15 Exempted and Conditionally Exempted Discharges

C.15.b.iii.(2)(b), (3)(e) ► Emergency Discharges of Fire Fighting Water and Foam

(For FY 24-25 Annual Report only) **C.15.b.iii.(2)(b)**: Collectively submit a Firefighting Discharges Report by September 30, 2025, that describes progress on, and recommendations regarding, the implementation of the items listed in Provision C.15.b.iii.(2)(a)(i)-(vii).

Summary:

See the Regional BMP Report submitted by BAMSC on behalf of all MRP Permittees to the Water Board Executive Officer and included in Appendix 13-1 of the SCVURPPP FY 24-25 Annual Report.

C.15.b.iii.(3)(e): Annually report on the following ongoing practices:

- Ensuring proper BMPs and SOPs are included in contracts for non-municipal (contracted) staff hired by Permittees to assist with containment and cleanup, and to assist with prevention and mitigation of adverse impacts, of discharges associated with firefighting emergencies; and
- Evaluating the adequacy of large industrial sites' BMPs and SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters within Permittees' jurisdictions and cause those BMPs and SOPs to be improved as appropriate.

Summary:

Efforts continue in the BAMSC Regional Firefighting Discharges Work Group to address recommended BMPs and SOPs to assist with discharges associated with firefighting emergencies. Refer to the SCVURPPP FY 24-25 Annual Report for a summary of the Work Group's progress to address recommended BMPs/SOPs in the Regional BMP Report due September 30, 2025. Valley Water provided input for the Regional Report through participation in the SCVURPPP IND/IDDE AHTG. Valley Water anticipates fully implementing recommended BMPs/SOPs through contracted staff hired to assist with containment and cleanup, with guidance provided in the Regional BMP Report.

Valley Water staff reviewed facilities for applicability of the C.15.b.iii.(3)(c) "Large Industrial Facilities" by using a SCVURPPP guidance document from April 3, 2024. None of Valley Water facilities meet the Large Industrial Facility definition. Additionally, since Valley Water facilities are located within several other permittees jurisdiction, Valley Water will refer to the respective municipality Fire Department's procedures and BMPs in the event of a firefighting emergency on Valley Water property and support as appropriate. Valley Water has standing agreements with contractors who specialize in hazardous waste mitigation and emergency response and are capable to provide appropriate and recommended containment and cleanup activities. Valley Water staff will distribute the SCVURPPP BMP fact sheet for Fire Restoration Contractors to applicable contractors who are hired.

C.15.b.vi.(2) ► Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering

Provide implementation summaries of the required BMPs to promote measures that minimize runoff and pollutant loading from excess irrigation. Generally, the categories are:

- Promote conservation programs
- Promote outreach for less toxic pest control and landscape management
- Promote use of drought tolerant and native vegetation
- Promote outreach messages to encourage appropriate watering/irrigation practices
- Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.

Summary:

Promote Conservation Programs, and Drought Tolerant and Native Vegetation

Valley Water has several water conservation programs, including residential and commercial conservation programs specifically aimed at reducing runoff and excess irrigation. The Landscape Rebate Program provides rebates for replacing high-water using landscapes with low-water using plants and permeable hardscapes, installing rainwater capture (rain gardens, rain barrels, and cisterns) and for upgrading to efficient irrigation equipment. In FY 24-25, 766 rebates (over $2.2M) were issued through the Landscape Rebate Program. Though the Landscape Rebate Program continues to experience a slight decline in application rate compared to the height of the drought in FY22, rebates issued in FY25 still remain about twice as high as pre-drought participation. Other programs that help reduce runoff and excess irrigation include the Water Wise Outdoor Survey Program, which provides free outdoor irrigation audits with a trained specialist for single family residential landscapes and for businesses with small landscapes in Santa Clara County. In FY 24-25, the Water Wise Outdoor Survey Program conducted 207 outdoor surveys, this is over a 23% increase from FY23-24 due to increased marketing and outreach countywide.

The Large Landscape Program similarly provides free outdoor irrigation audits with a trained specialist, but focuses on multi-family, commercial, industrial, and institutional properties with larger landscapes and dedicated irrigation meters. Additionally, this program evaluates site water use and provides monthly usage reports through site-specific irrigation budgets and field surveys. In FY 24-25, eligibility for the Large Landscape Program was expanded, bringing the total enrolled sites to approximately 4,800. Cumulatively this year, this program delivered over 57,000 monthly water-use reports, which compare actual irrigation water use against site-specific budgets. These water-use reports are distributed to key stakeholders of enrolled sites to improve monitoring of water use, which helps reduce leaks and improve irrigation scheduling among other sources of inefficient irrigation water-use. Additionally, 21 field surveys were conducted. These surveys result in a detailed report to site stakeholders outlining observed irrigation issues and key recommendations to improve efficiency.

Valley Water also provides free hose nozzles and soil moisture meters and maintains several webpages to reduce water waste and to increase water-use efficiency. Valley Water works with water retailers to reduce water use and provides residential Do-It-Yourself water saving kits and videos for checking and repairing leaks. All water conservation programs and resources offered by Valley Water can be reviewed further at www.watersavings.org.

Promote Outreach for Less Toxic Pest Control and Landscape Management

For outreach on less toxic pest control and appropriate irrigation practices, refer to the Watershed Watch Campaign in section C.7. Public Information and Outreach and the Regional OWOW Program (IPM Store Partnership) and Green Gardener Training Programs in section C.9. Pesticide Toxicity Control of the Program's Annual Report. In addition, Valley Water provides brochures on the use of drought-tolerant and native vegetation that requires less irrigation and pesticides. Valley Water launched our Water Conservation Webinar Series with presentations from industry experts on sustainable landscaping practices such as rainwater collection, irrigation controller programming, watershed approach to landscaping, and outdoor leak detection. As a part of Valley Water's Landscape Maintenance Consultation Program, which provides past Landscape Conversion Rebate participants with a free onsite consultation to help better maintain their new landscapes, Integrate Pest Management principals are highlighted to encourage less toxic pest control and weed abatement practices. The Landscape Maintenance Consultation Program visited 115 sites in FY 24-25. Valley Water's 2020 Creekwise brochure also encourages creekside property owners to minimize use of pesticides (https://www.valleywater.org/learning-center/healthy-creeks-and-ecosystems/creekside-property-program).

Promote Outreach Messages to Encourage Appropriate Watering/Irrigation Practices

Valley Water regularly updates its outreach messages to promote responsible watering and irrigation practices. Each spring and summer, a multi-lingual, multi-platform campaign encourages reducing outdoor water use to support long-term conservation goals established by Valley Water's Water Supply Master Plans. The "Bring Your Yard to Life!" campaign promotes water-efficient landscaping and encourages participation in Valley Water's Landscape Rebate Program, Graywater Rebate Program, and Water Wise Outdoor Survey Program. As part of the spring campaign, Valley Water used programmatic, digital, and social media channels – including Facebook, Instagram, and Nextdoor – to market the Water Wise Outdoor Survey Program. Additionally, an email campaign was launched to promote the Graywater Rebate Program, educating residents about graywater systems and encouraging participation. Using Community-Based Social Marketing strategies, Valley Water targeted past Landscape Rebate Program participants, assuming those who had already converted their yards might be more open to graywater projects.

Also, through the Nursery Outreach Program, Valley Water supplies gardening literature and rebate information to nurseries and irrigation supply stores across the county. Valley Water is also for a partner in the South Bay Green Gardens website (www.southbaygreengardens.org), which provides resources on sustainable landscaping and maintains a county-wide landscape events page.

Implement Illicit Discharge Enforcement Response Plan for Ongoing, Large Volume Landscape Irrigation Runoff

Valley Water started the Water Waste Program in 2014. Water waste reports are received from the public through an online submission tool (Access Valley Water), the Water Wise Hotline (408-630-2000), and via email through WaterWise@valleywater.org. These reports are dispatched to the water waste team who contact the responsible party, or reports are referred to the property's water retailer, to ensure they are aware of the issue(s) that may be contributing to water waste. Letters are mailed to the property owner outlining the reported water waste and highlighting Valley Water rebate programs, free services, and resources that could assist in resolving the issue(s). Inspections may be conducted depending on the severity of the reported water waste. Throughout FY 24-25, the water waste team followed an educational approach for all water waste reports, in accordance with Valley Water Ordinance No. 23-02. Valley Water continued to spread the message regarding the ban on irrigating non-functional turf at commercial, industrial, and institutional properties.

Valley Water processed 353 water waste reports in FY 24-25, which were responded to within 24-business hours and ultimately resolved. The time required to resolve cases varies depending on the nature of the report, the details included with the initial report, the receptiveness of the property with the reported violation, and the stakeholders involved (typically but not limited to the water retailer or city). With the end of the most recent drought, this decline in reporting was expected. Reports involved water leaks from broken plumbing and irrigation systems, overspray onto pavement, irrigation runoff, and watering during the wrong time of day. Irrigation runoff from excessive watering, overspray onto impervious surfaces and leaking irrigation systems can all be mechanisms for the transport of urban pollutants such as oils, herbicides, pesticides, fertilizers, and lawn clippings to creeks, which can ultimately degrade stream water quality.

Section 17 – Provision C.17 Discharges Associated with Unsheltered Homeless Populations

C.17.a.iii.(2) ► BMP Implementation and Effectiveness Evaluation

(For FY 24-25 Annual Report) Submit a map identifying the approximate location(s) of unsheltered homeless populations within your jurisdiction, including homeless encampments and other areas where other unsheltered homeless people live.

Summary:

A map showing the count of unsheltered populations by census tracts in relation to existing streams, rivers, flood control channels, and other surface water bodies within our jurisdiction is included in Appendix 17-1. The map was developed using the point-in-time survey data provided by the County of Santa Clara. Due to privacy and safety concerns, the County did not provide location data below the census tract level for this publicly available report.

The point-in-time survey count reflects the on-the-ground reality of the few days the count was done. The maps aren't designed or meant to be an accurate real-time count of the total number of people experiencing homelessness and where they are, as the unhoused community frequently moves, shrinks as people connect to housing services, and grows if others fall into the homelessness experience. Valley Water collects general location information for encampments on Valley Water property outside of the MS4 during creek inspections to determine the condition of creeks for which Valley Water has responsibility. If issues are identified (e.g., trash and debris to be removed, access gates or fences to be repaired, etc.), staff prepare work orders for follow-up actions to be taken. To keep maintenance, biological, and other staff informed of site conditions where they will be working, encampments may be identified and geospatially located during inspections. Encampment sites may also be identified to better assess accumulated trash and debris that needs to be removed to keep waterways clean through Valley Water's Good Neighbor Program: Encampment Cleanup efforts. Neither the number of individuals present at an encampment site, nor any identifying information is collected by Valley Water. Information associated with encampments that are reported by the public through Access Valley Water is used internally and is not publicly available.

(For FY 24-25 Annual Report) Report on the best management practices being implemented and include the effectiveness evaluation reporting required in Provision C.17.a.ii.(3) and additional actions or changes to existing actions that the Permittee will implement to improve existing practices.

Summary:

At the time the 2025 Santa Clara County point-in-time (PIT) count was conducted, it is unknown whether or how many unsheltered individuals were observed within Valley Water property during the count. However, in February 2025, Valley Water staff conducted an internal encampment count on Valley Water-owned property, which amounted to 224 individual encampment structures observed. Valley Water partners with municipal and County agencies that provide supportive housing and other services to unsheltered individuals within our jurisdiction.

Valley Water implements the following best management practices (BMPs) and programmatic efforts to address non-stormwater discharges from unsheltered populations located within our jurisdiction.

BMP/Programmatic Effort	Effectiveness Evaluation	Changes Planned
Trash collection and disposal - Valley Water provides dumpsters at several large managed encampments to minimize trash introduced into local waterways.	In FY 24-25, the dumpsters we provided captured 15.13 tons of trash from 3 different encampment locations—two at Llagas Creek in Gilroy and one at Guadalupe River in San José. This effort allowed encampment residents to service their own trash disposal needs and reduced the amount of accumulated trash that needed to be cleaned up by Valley Water crews.	Future deployment of dumpsters will be considered where suitable at managed encampments.
Encampment cleanups – Valley Water routinely conducts cleanups in census tracts that overlap with Valley Water property where unsheltered populations are known to congregate. Cleanups are conducted by Valley Water staff and a contractor (Jensen Landscape Services).	In FY 24-25 we conducted 501 encampment site cleanups and removed 14,599 CY (1043 tons) of trash from these locations. The program has been successful in removing all trash from encampments during cleanups, but trash quickly regenerates at encampments.	We plan to continue conducting trash cleanups at locations that form along Valley Water property, as appropriate (approximately 200 individual encampments). The recent adoption of the Watershed Protection Zones Ordinance may change the amount and frequency of the cleanups.
Portable toilets and handwashing stations – Valley Water provides portable toilets and handwashing stations at select encampment locations as-needed.	Over the course of FY 24-25, we provided 35 portable toilets with handwashing stations at 19 locations. We are not able to provide these facilities at all locations due to site servicing constraints. This effort has been appreciated by the individuals residing in the encampments and has helped to reduce the amount of biowaste that enters the waterways.	Valley Water will continue to evaluate sites where the provision of portable toilets and handwashing stations would be impactful.
Coordination with Santa Clara County Office of Supportive Housing - Valley Water coordinates with the Santa Clara County Office of Supportive Housing and the Continuum of Care (CoC) Program to support their providing housing to unsheltered individuals. Valley Water has a contract with Santa Clara County to provide outreach services and housing assistance to encampments on VW lands outside of San Jose limits countywide. Additionally, Valley Water has coordinated with City of San José, a member of the CoC, to build Tiny Homes on Valley Water property in South San José.	The first meeting with the County on outreach services and housing assistance took place in FY 23-24. The County provides ongoing updates on the effectiveness of outreach and housing efforts. These efforts have resulted in the placement of several unsheltered individuals into interim or permanent housing.	We will continue to coordinate with the County to offer housing services to unsheltered individuals.

BMP/Programmatic Effort	Effectiveness Evaluation	Changes Planned
Funding Initiatives - Valley Water provides funds for water quality initiatives, volunteer cleanups, or partnership efforts to support non-profit and local agencies who provide supportive services. Ongoing grant funding is available to partners under Project F9 of Valley Water's voter-approved Safe, Clean Water and Natural Flood Protection Program.	In FY 24-25, there were no Valley Water grant funded partner efforts related to unsheltered populations.	Grant funds will continually be available for application on an annual basis.
Internal Coordination - Valley Water stormwater staff coordinate efforts with the following departments to inform other staff about stormwater requirements and BMPs that help reduce stormwater discharges from unsheltered populations, and offer support services to unsheltered populations: • Board of Directors - Environmental Creek Cleanup Committee (ECCC) • All Valley Water Divisions conducting field work, including Watersheds, Water Utility and other divisions.	The Valley Water Deputy Operating Officer of Watershed Division, field operations staff, security unit staff, and environmental health and safety staff meet weekly to discuss encampment management issues on Valley Water fee and easement property. Additionally, the Environmental Creek Cleanup Committee (formerly known as the Homeless Encampment Committee) was established to discuss homelessness and encampment issues and bring discussion and recommendations back to the Board. Stakeholders for the ECCC include, but not limited to, the public, municipalities, police departments, and homeless advocates.	We will continue to coordinate with other divisions to offer support services to unsheltered individuals.
Responding to illicit discharges from encampments - Valley Water maintains a contract for the collection, transportation, and disposal of biohazardous waste as well as emergency cleanup to minimize the environmental and public health impacts of encampments on its property. Work done by the contractor prevents human waste, soiled clothing and bedding, and syringes and sharps from making its way into creeks and nearby publicly trafficked areas. Additionally, Valley Water operates a 24/7 telephone hotline to address public and staff	Through these efforts, Valley Water is able to respond to biowaste and hazardous material discharges as they are discovered.	No changes are currently planned.

BMP/Programmatic Effort	Effectiveness Evaluation	Changes Planned
reports of hazardous material spills. The agency guarantees a response within 2 hours. Issues on Valley Water property are addressed by staff in a timely manner, and issues outside of Valley Water jurisdiction are communicated to relevant partner agencies.		
Physical barriers and deterrents to encampments – Valley Water implements deterrent measures on an ad hoc basis as needs are identified.	Deterrence measures are implemented as needed and are mostly related to reducing vehicular access on Valley Water property.	No changes are currently planned.
Encampment Management Policies – In FY25, Valley Water adopted the Watershed Protection Zones Ordinance to establish new regulations prohibiting camping and encampment-related activities on Valley Water property. The ordinance enables Valley Water to manage encampment impacts better while working with local agencies and private partners to implement long-term solutions to address unsheltered homelessness within Santa Clara County.	Education and outreach on the ordinance were shared with unsheltered individuals residing in encampments and the surrounding community beginning at the end of 2024 and on a continual basis. Enforcement began in January 2025.	No changes are currently planned.

Section 20 - Provision C.20 Cost Reporting

C.20.c ► Reporting

Did your agency complete a fiscal analysis of the costs incurred to comply with MRP requirements during FY 24-25 according to the accepted Bay Area cost reporting framework and methodology?	X	**Yes, see attached FY 24-25 Cost Report in Appendix 20-1**		**No**
If No, provide schedule for completion:				

Section 21 – Provision C.21 Asset Management

C.21.c.i ► Asset Management Plan

(For FY 24-25 Annual Report Only) Did your agency develop an Asset Management Plan to comply with MRP requirements by June 30, 2025?	X	**Yes, see attached Asset Management Plan in Appendix 21-1**		**No**
If No, provide schedule for completion:				

Glossary

AHTG	Ad Hoc Task Group
BAMSC	Bay Area Municipal Stormwater Collaborative
BMP	Best Management Practice
BASMAA	Bay Area Stormwater Management Agency Association
CASQA	California Stormwater Quality Association
CCAG	Creek Connections Action Group
CCCWP Permittees	Contra Costa Clean Water Program Permittees
CDC	Centers for Disease Control and Prevention
CE	Continuing Education
CEO	Chief Executive Officer
CEQA	California Environmental Quality Act
CoC Program	Continuum of Care Program
CWA	Clean Water Act
CY	Cubic Yard
DDCP	Direct (Trash) Discharge Control (offset) Program
DPR	Department of Pesticide Regulation
ECCC	Environmental Creek Cleanup Committee
EIH	Emergency Interim Housing
EO	Education Outreach Program
ER Program	Emergency Response Program
ERP	Enforcement Response Plan
FY	Fiscal Year
GSI	Green Stormwater Infrastructure
HM	Hydromodification Management
HOS	Hypolimnetic Oxygenation System
IC/ID	Illicit Connection and Illegal Dumping
IDDE	Illegal Discharge Detection and Elimination

IND	Industrial/Commercial Discharger Inspection Program
IPM	Integrated Pest Management
JTA/CAP	Joint Trail Agreement and Collaboration Action Plan
KPI	Key Performance Indicator
LID	Low Impact Development
LUS	Land Use Subgroup
MECIR	Monthly Environmental Compliance Inspection Report
MOA	Memorandum of Agreement
MRP	Municipal Regional Permit
NOI	Notice of Intent
NPDES	National Pollution Discharge Elimination System
O&M	Operation and Maintenance
OFEE	Oil-filled electrical equipment
PCB	Polychlorinated Biphenyl
PIT count	Point In Time count
POC	Pollutants of Concern
Program	Santa Clara Valley Urban Runoff Pollution Prevention Program (the Program)
RMP	Regional Monitoring Program
RWQCB	Regional Water Quality Control Board
RWTP	Rinconada Water Treatment Plant
SCC	Santa Clara County
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SDS	Safety Data Sheet
SFBRWQCB / Water Board	San Francisco Bay Regional Water Quality Control Board
SMP	Stream Maintenance Program
SOP	Standard Operating Procedure
State	California State Agency
STEAM	Science, Technology, Engineering, Art, and Math

SWPPP	Storm Water Pollution Prevention Plan
TK	Transitional Kindergarten
TMA	Trash Management Area(s)
TMDL	Total Maximum Daily Load
VH, H, or M trash generation areas	Very High, High, or Moderation trash generation areas
Valley Water	Santa Clara Valley Water District
VW	Valley Water
ZLI	Zero Litter Initiative

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APPENDICES

Municipal Regional Stormwater Permit: Annual Report FY 2024-2025

Appendix

Section 17 – Discharges Associated with Unsheltered Homeless Populations

Appendix 17-1: C.17.a.iii.(2) BMP Implementation and Effectiveness Evaluation – Map

Section 20 – Cost Reporting

Appendix 20-1: C.20.c.ii. – Annual Cost Analysis

Section 21 – Asset Management

Appendix 21-1: C.21.c.i. – Asset Management Plan

APPENDIX 17-1

BMP Implementation and Effectiveness Evaluation – Map

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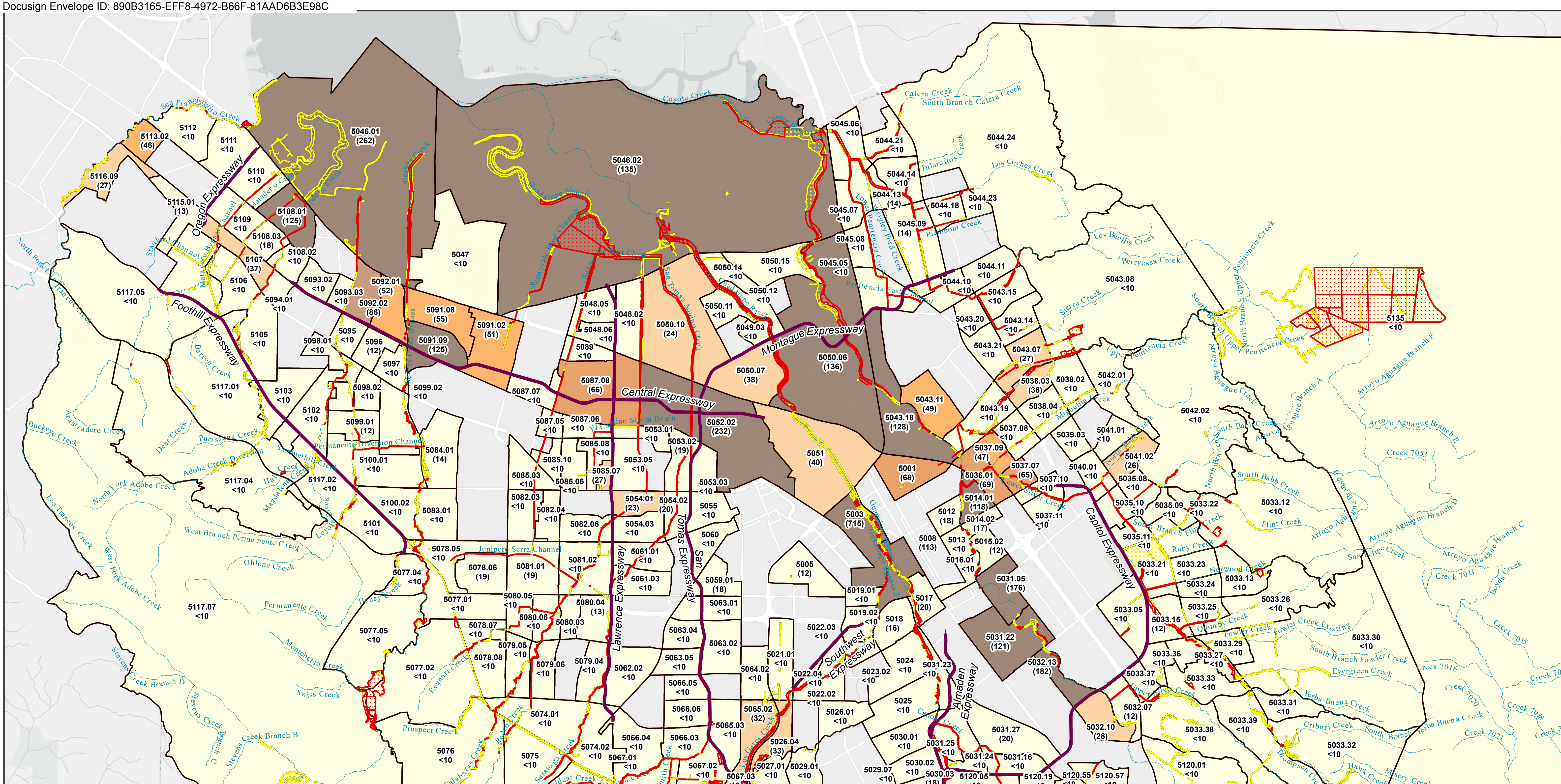


0 1.25 2.5 5 Miles

N

Unsheltered Population Count by Census Tract, with Census Tract ID

0 ≤ 20	41 ≤ 60	81 ≤ 100
21 ≤ 40	61 ≤ 80	≥100

Creeks — Valley Water Owned
Expressways — Valley Water Easement
Census Tracts

SANTA CLARA VALLEY WATER DISTRICT

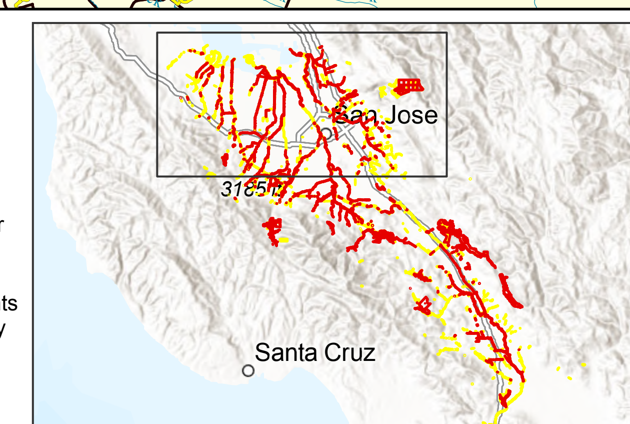
Location and Count of Unsheltered Population by Census Tract

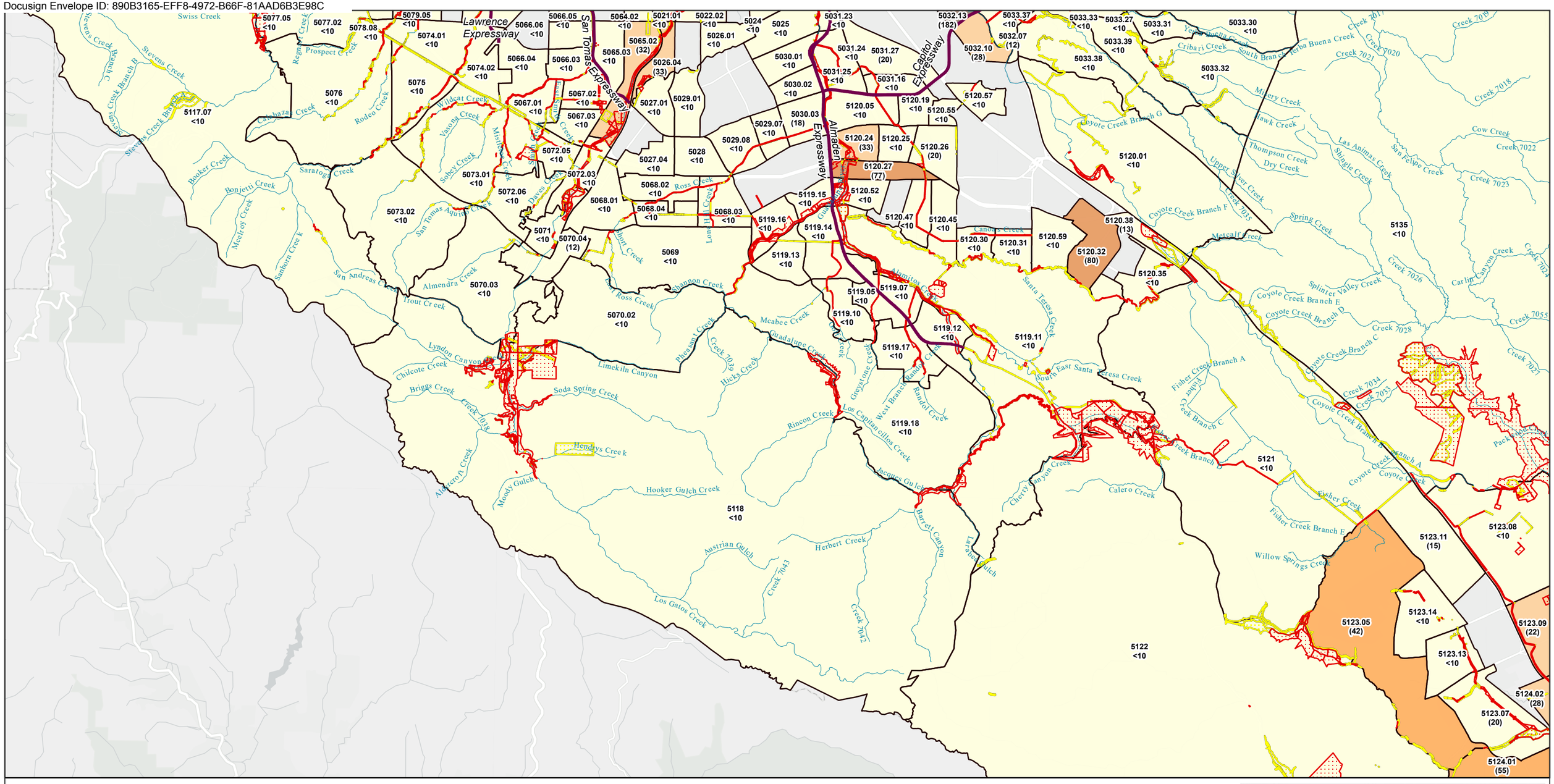
Santa Clara Valley Urban Runoff Pollution Prevention Program

September 2025

Notes

1. The total estimated unsheltered population in census tracts that contain Valley Water owned land or Valley Water Easements is **4,755** based on the 2025 Point-in-Time survey.
2. Unsheltered population counts by census tract data source: *Santa Clara County Point-in-Time Community Report 2025.*
3. As defined by Santa Clara County, unsheltered persons are individuals or families with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train stations, airport, or campground.
4. Entire census tracts containing Valley Water owned land or Valley Water Easements are displayed on this map. Only the areas displayed as Valley Water Owned or Valley Water Easements belong to Valley Water.
5. No data was provided on unsheltered counts in Valley Water property. All counts displayed are for the entire census tract containing Valley Water property.
6. Basemap source: ESRI





0 1.25 2.5 5 Miles

N

Unsheltered Population Count by Census Tract, with Census Tract ID

- 0 ≤ 20
- 21 ≤ 40
- 41 ≤ 60
- 61 ≤ 80
- 81 ≤ 100
- ≥100
- Creeks
- Expressways
- Census Tracts
- Valley Water Owned
- Valley Water Easement

SANTA CLARA VALLEY WATER DISTRICT

Location and Count of Unsheltered Population by Census Tract

Santa Clara Valley Urban Runoff Pollution Prevention Program

September 2025

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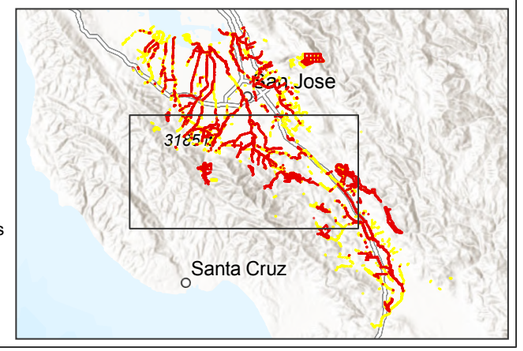

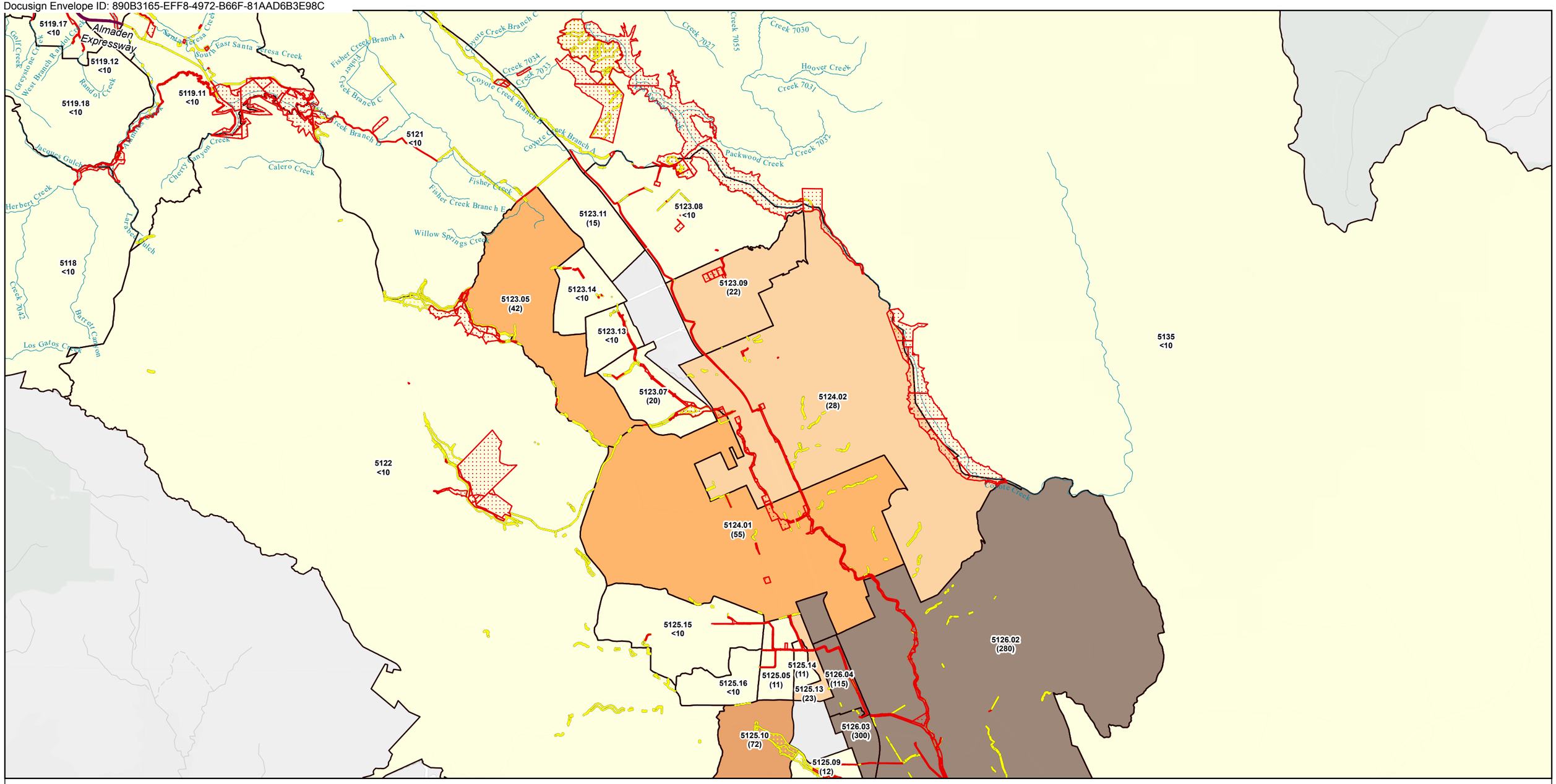

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SANTA CLARA VALLEY WATER DISTRICT

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September 2025

Santa Clara Valley Urban Runoff Pollution Prevention Program

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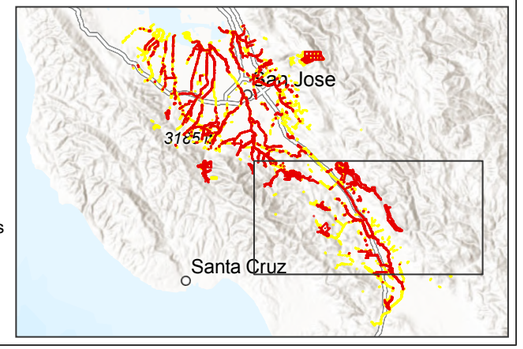

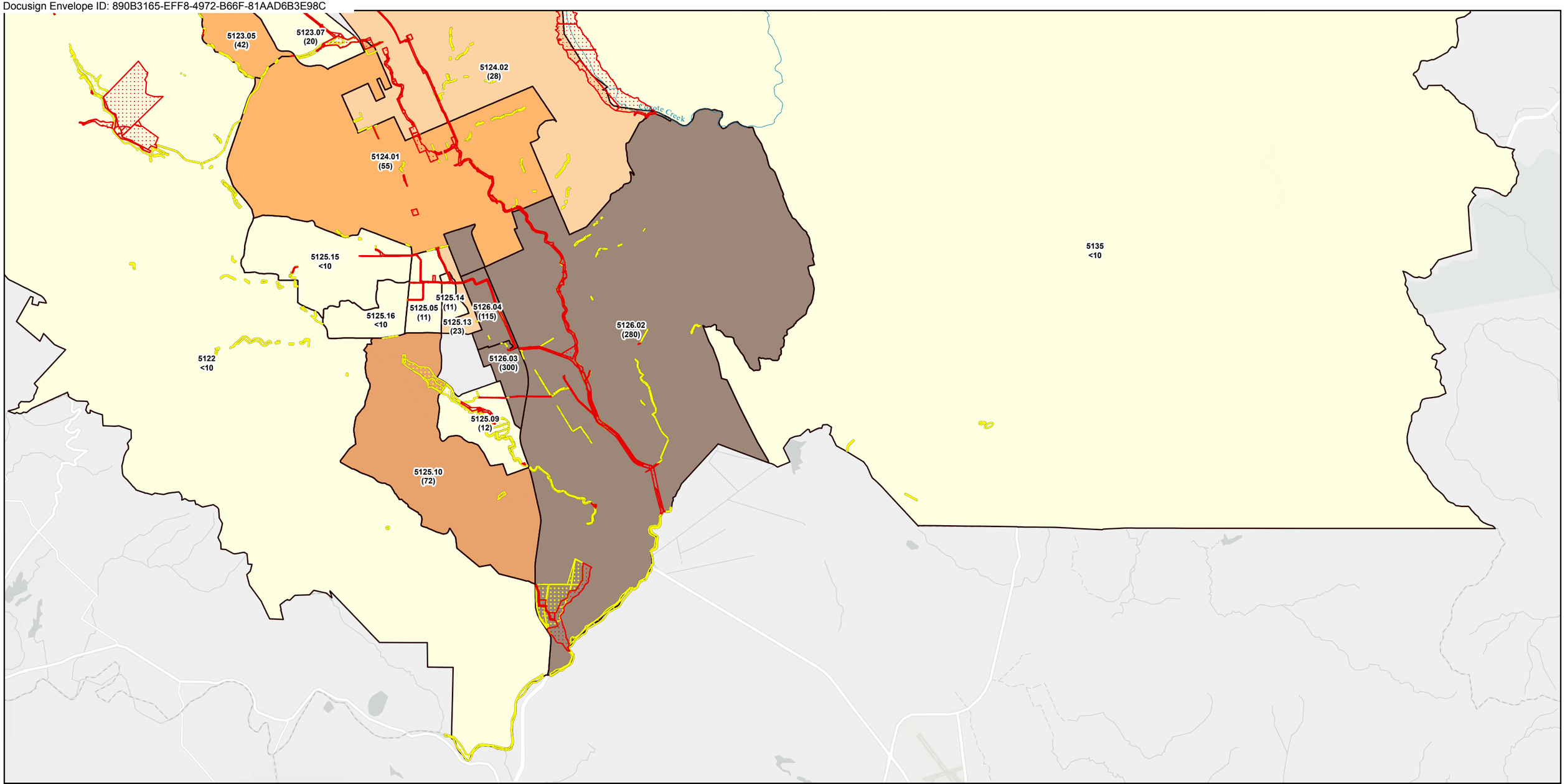

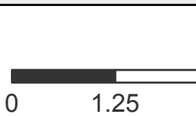

SANTA CLARA VALLEY WATER DISTRICT

Location and Count of Unsheltered Population by Census Tract

September 2025

Santa Clara Valley Urban Runoff Pollution Prevention Program

Unsheltered Population Count by Census Tract, with Census Tract ID

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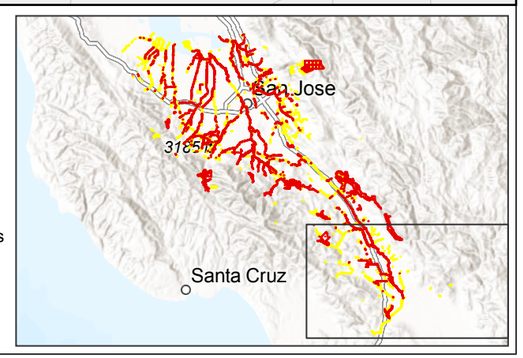

APPENDIX 20-1

Annual Cost Analysis

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FY 2024-2025 ANNUAL REPORT

Submittal of Annual Cost Analysis

As a part of the FY 2024-2025 Annual Report, Santa Clara Valley Water District (Valley Water) has prepared and submitted a fiscal analysis of the costs incurred to comply with the Municipal Regional Stormwater Permit, Order No. R2-2022-0018 (MRP 3.0), Provision C.20 Cost Reporting. The fiscal analysis is consistent with the Cost Reporting Framework and Guidance Manual that was developed for the San Francisco Bay region by the Bay Area Municipal Stormwater (BAMS) Collaborative and includes the following:

- **Cost Reporting Summary** – Estimated personnel and overhead costs, external professional services costs, capital expenditures, and operation and maintenance costs by program area (program management and MRP provision) for the current reporting fiscal year and estimated expenditures for the next reporting fiscal year; and
- **Source of Funds Summary** – Source of funds for the current reporting fiscal year including legal restrictions on the use of the funds, and identification of funds that are shared on a regional or countywide basis.

Valley Water has submitted the Cost Reporting Summary and Source of Funds Summary in good faith, based on the best available stormwater program cost reporting data compiled from multiple sources and departments within Valley Water. As such, it is important to recognize the inherent limitations associated with the summaries including:

- The values provided are compiled from multiple, internal sources and different cost accounting programs, and attempt to separate out duties and time that staff spend complying with the numerous requirements in the MRP. As a result, the individual and compiled values may differ from the adopted budgets.
- Given the difficulty in accounting for the wide range of staff and expenditures associated with the implementation of the stormwater program throughout the Valley Water, the values in the Cost Summary Table are rounded to the nearest $1,000.
- Given the diversity of the Bay Area permittee agencies in size, characteristics, and jurisdiction, the costs presented for various program areas may or may not be comparable among permittees.

Provision C.20, Cost Reporting Framework

Summary of Estimated Costs

Permittee Name	**Santa Clara Valley Water District**
Current Reporting FY	**2024-2025**

Permit Provision	Program Area	Estimated Cost by Category: Personnel[b] & Overhead Costs[c] (Not O&M related)	External Professional Services/Other Costs[d] (Not O&M related)	Capital Expenditures[e]: Planning, Design, Permitting & Construction[f]	Capital Expenditures[e]: Land Acquisition Costs[g]	Operation and Maintenance (O&M) Costs[h]	Estimated Total Expenditures for Current Reporting Year	Estimated Total Expenditures for Next Reporting Year
---	Program Management[a]	$ 314,000	$ 600,000				$ 914,000	$ 941,000
---	Stormwater Permit Fees		$ 10,000				$ 10,000	$ 10,000
C.2	Municipal Operations	$ 79,000	$ 84,000	$ -	$ -	$ 785,000	$ 948,000	$ 976,000
C.3	New Development and Redevelopment	$ 81,000	$ 129,000	$ 60,000	$ -	$ 12,000	$ 282,000	$ 290,000
C.4	Industrial and Commercial Site Controls	$ -	$ 8,000				$ 8,000	$ 8,000
C.5	Illicit Discharge Detection and Elimination	$ 746,000	$ 98,000				$ 844,000	$ 869,000
C.6	Construction Site Control	$ 1,385,000	$ 49,000				$ 1,434,000	$ 1,477,000
C.7	Public Information and Outreach	$ 1,971,000	$ 1,449,000				$ 3,420,000	$ 3,523,000
C.8	Water Quality Monitoring	$ 12,000	$ 461,000				$ 473,000	$ 487,000
C.9	Pesticides Toxicity Control	$ 248,000	$ 2,112,000				$ 2,360,000	$ 2,431,000
C.10	Trash Load Reduction and Assessment	$ 31,000	$ 165,000	$ -	$ -	$ 34,000	$ 230,000	$ 237,000
C.11	Mercury Controls	$ 23,000	$ -				$ 23,000	$ 23,000
C.12	PCBs Control	$ 3,000	$ 167,000	$ -	$ -	$ -	$ 170,000	$ 175,000
C.13	Copper Control	$ -	$ 2,000				$ 2,000	$ 2,000
C.14	Bacteria Control	$ -	$ -				$ -	$ -
C.15	Exempted and Conditionally Exempted Discharges	$ 693,000	$ 2,411,000				$ 3,104,000	$ 3,197,000
C.16	Discharges to Areas of Special Biological Significance	$ -	$ -				$ -	$ -
C.17	Discharges Associated with Unsheltered Homeless Populations	$ 4,311,000	$ 1,737,000				$ 6,048,000	$ 6,229,000
C.18	Control of Sediment Discharges from Coastal San Mateo County Roads	$ -	$ -				$ -	$ -
C.19	Cities of Antioch, Brentwood, and Oakley, and Unincorporated Contra Costa County and Contra Costa County Flood Control and Water Conservation District	$ -	$ -				$ -	$ -
C.21	Asset Management	$ 33,000	$ 24,000				$ 57,000	$ 59,000
	Estimated Total Expenditures by Category	**$ 9,930,000**	**$ 9,506,000**	**$ 60,000**	**$ -**	**$ 831,000**		
	Estimated Total Expenditures for Stormwater Program						**$ 20,327,000**	**$ 20,934,000**

[a] Includes activities associated with the general administration and management of the stormwater program as well as the development of the cost reporting (C.20), the annual reporting (C.22), and the permit renewal processes (C.25).

[b] Cost of Permittee staff labor (i.e., labor rates or dollar amounts that include direct labor cost and cost of benefits) on stormwater permit-related activities.

[c] Costs of maintaining the infrastructure of the organization such as management, finance support services, janitorial, motor pool, etc.

[d] Includes the Permittee's contribution to the countywide program budget (reported by provision/program area) and costs not included in the other categories.

[e] Fixed, one time expenses incurred on the purchase of land, buildings, and equipment, or expenditures related to the planning, design, permitting, and construction of stormwater quality related assets. It only applies to the following provisions: C.2, C.3, C.10, and C.12.

[f] Costs associated with planning, design, permitting, and construction of stormwater quality related assets.
[g] One time cost of real property, exclusive of the cost of any constructed assets on the property, necessary to be acquired for projects. Typically applies to the purchase of land for construction of stormwater quality assets if the land is not already owned by the Permittee.
[h] Costs related to the O&M of publicly owned stormwater quality-related assets constructed for stormwater permit compliance. Includes personnel, contractor, equipment, materials, and disposal costs related solely to O&M. It only applies to the following provisions: C.2, C.3, C.10, and C.12.

Cost Reporting Framework

Sources of Funds for Implementation of the MRP

Back to Cost Reporting Summary

Permittee Name	anta Clara Valley Water Distri
Current Reporting FY	2024-2025

Category	Indicate if there are legal restrictions on the use of the funds	Indicate if funds are shared on a regional or countywide basis[a]	Comments *[For "Yes" answers, comments shall be provided. For "No" answers, comments are optional.]*
	Yes/No	Yes/No	
Fund 12 - Watershed and Stream Stewardship	No	No	Fund 12 is primarily funded by the 1% ad valorem property taxes which does not have a legal restriction on the use of funds.
Fund 26 - Safe Clean Water	Yes	No	Fund 26 is primarily funded by the Safe Clean Water parcel tax, the legal restriction on the use of funds is defined in the ballot that was approved by voters in November 2020. For more info: https://www.valleywater.org/safe-clean-water-and-natural-flood-protection-program
Fund 61 - Water Utility Enterprise	Yes	No	Fund 61 is primarily funded by water utility rates and charges. The legal restriction on the use of funds is limited to water utility enterprise expenditures, as defined in the District Act. For more info: https://www.valleywater.org/how-we-operate/about-valley-water/district-act
U.S. EPA San Francisco Bay Area Water Quality Improvement Fund Grant	Yes	No	Nine Creek Encampment Cleanup and Coyote Creek Bank Rehabilitation Project. Funding is is subject to applicable EPA regulatory and statutory provisions and the terms and conditions of the grant award agreement.
Grant Funds	Yes	Yes	Watching Our Watersheds Receiving Water Monitoring Grant

[a] An example of funding resources shared on a regional or countywide basis is a grant used for MRP compliance tasks which benefits multiple countywide programs in a region or multiple permittees

Notes: *[Optional]*

1. These are the main funding sources for 46 different project codes that are utilized to complete stormwater tasks/activities.
2. Some of the project codes use a combination of the funds listed above.
3.
4.
5.

Red Text	Red text in data entry worksheets are placeholders or examples that should be replaced or deleted. Cells for potential data entry are either empty or contain red text.
Blue Cells	DO NOT enter values; these are auto-calculated based on the General Cost tabs or totals.

APPENDIX 21-1

Asset Management Plan

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Valley Water

Asset Management Plan

SANTA CLARA VALLEY
WATER DISTRICT

June 2025

In compliance with the San Francisco Bay Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, Order No. R2-2022-0018, Provision C.21.

The Asset Management Plan was developed by the Santa Clara Valley Water District (Valley Water) pursuant to Permit Provision C.21 of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2022-0018, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. It contains a proposed asset management framework for stormwater quality hard assets owned by Valley Water based on MRP requirements. The Plan will be updated as lessons are learned through an adaptive management strategy.

Executive Summary

The Santa Clara Valley Water District (Valley Water) developed this Asset Management Plan to guide implementation of operation and maintenance (O&M) of assets installed to comply with the Municipal Regional Stormwater Permit (MRP). Through implementation of this Asset Management Plan, Valley Water can more effectively plan for system replacements and upgrades to meet MRP goals.

The MRP requires permittees to develop asset management plans to ensure the satisfactory condition of all hard assets. In the context of stormwater, hard assets are publicly-owned structural controls that serve a water quality function. Examples provided in the MRP include bioretention areas, pervious pavement systems, and full trash capture devices. The MRP also specifically requires each asset management plan to include a description of asset categories, an asset inventory, an Operation, Maintenance, Rehabilitation, and Replacement Plan (O&M Plan), and a reporting strategy.

The purpose of this Asset Management Plan is to serve as a long-range O&M planning document that provides a rational framework for:

- Identifying and categorizing hard assets;
- Characterizing the conditions of hard assets;
- Prioritizing O&M activities;
- Managing and analyzing hard asset data; and
- Determining current and future costs.

This Asset Management Plan establishes a categorization hierarchy for structural controls that serve a water quality function. The hierarchy includes: Control Type, in which hard assets are categorized at a high level based on the permit provision requiring them (e.g., Provision C.3 or C.10) and whether they meet low impact development (LID) treatment standards or not; Asset Category, which refers to groups of hard assets that generally function similarly; and Asset Class, which represents the specific types of hard assets that have been constructed. All of the hard assets within the hierarchy make up Valley Water's asset inventory.

To inform a strategy for prioritizing and scheduling O&M of inventoried hard assets and to comply with the MRP, this Asset Management Plan includes an O&M Plan. The O&M Plan will guide how data are obtained through hard asset assessment and evaluated with a risk-based prioritization strategy that considers an asset's likelihood of failure and consequence of failure when establishing O&M schedules. Data obtained with the O&M Plan will be stored electronically using an inventory spreadsheet.

In addition to strategic prioritization of O&M, it is useful to understand costs which directly impact the resources available for asset management. For the purposes of this Asset Management Plan, Valley Water will consider costs related to the processes for:

1. Prioritizing and scheduling O&M activities;
2. Evaluating the current condition, and identifying the need for maintenance, rehabilitation and replacement of inventoried hard assets;
3. Carrying out the routine maintenance, rehabilitation, and/or replacement of inventoried hard assets; and
4. Conducting reevaluation of risk and prioritization as part of adaptive management.

As systems are planned and come online, divisions responsible for the hard assets (depending on the facility) will become engaged and identify the associated costs with the above processes.

Valley Water will periodically compare cost projections with available funding sources. Per Provision C.20 of the MRP, Permittees are required to report costs of permit implementation annually, at the end of each fiscal year, and estimate costs of implementation for the subsequent fiscal year. Valley Water will use the Bay Area Cost Reporting Framework to estimate and report costs for permit implementation, including implementation of asset management requirements.

Valley Water will report on Asset Management Plan implementation annually, starting with the 2026 Annual Report. At a minimum, for each hard asset in the inventory, Valley Water will provide the following information:

- Asset category;
- Relevant design information;
- Contributing drainage area;
- Location;
- Condition; and
- O&M need.

Although Valley Water owns and operates various facilities that serve a water quality function such as sand filters, parking lot swales, and rain gardens, these early implementation features were not permit-required when installed and were not designed to current MRP-required standards. As such, they are considered “stormwater equipment” rather than hard assets in the context of the MRP and this plan. As hard assets are added in the future, they will be inventoried and maintained according to the plan.

List of Acronymns

ARS	Automatic Retractable Screen
CDS	Continuous Deflective Separation
CPS	Connector Pipe Screen
GSI	Green Stormwater Infrastructure
LID	Low Impact Development
LoF	Likelihood of Failure
MRP	San Francisco Bay Region Municipal Regional NPDES Stormwater Permit
NPDES	National Pollutant Discharge Elimination System
NSBB/DSBB	Nutrient Separating Baffle Box / Debris Separating Baffle Box
O&M	Operation and Maintenance
PCB	Polychlorinated Biphenyl
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
STM	Stormwater Treatment Measure
Valley Water	Santa Clara Valley Water District

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1.0 Introduction

Stormwater quality-related hard assets such as bioretention areas, pervious pavement systems, and full trash capture devices, are relatively new to municipal asset inventories. Across the region, most of these hard assets were recently constructed or installed and have not yet begun to fail, but as they age, there is potential for unknown or undiscovered issues if they are not properly inspected and maintained. Asset management can reduce unexpected, expensive, and reactive repairs and increase hard asset performance over their functional life. An effective asset management plan will guide efficient implementation of operation and maintenance (O&M) of hard assets installed to comply with the San Francisco Bay Area Municipal Regional Stormwater Permit (MRP) (San Francisco Bay Region Water Quality Control Board, 2024). Through implementation of an asset management plan, Valley Water can more effectively plan for needed system replacements and upgrades to meet MRP goals.

This section provides a general description of Valley Water and characteristics relevant to asset management; a description of MRP Provision C.21 requirements and rationale for stormwater quality-related hard asset management; and a discussion of the purpose and scope of this Asset Management Plan.

1.1 MRP Requirements

Valley Water is one of 79 agencies subject to the requirements of the MRP. Provision C.21 of the MRP requires each permittee to develop and implement an Asset Management Plan to ensure the satisfactory condition of all hard assets constructed to comply with various provisions of the MRP, such as Provision C.3 (New and Redevelopment Controls), C.10 (Trash Load Reduction), and C.12 (PCBs Controls).

The MRP defines hard assets, in the stormwater context, as publicly-owned structural controls that serve a water quality function. Examples provided in the MRP include, but are not limited to, bioretention areas, pervious pavement systems, and full trash capture devices. Permittees must develop an Asset Management Plan by June 30, 2025, and begin implementing the Plan by July 1, 2025.

Per MRP requirements, the Asset Management Plan must include, at a minimum:

1. A description of hard asset categories.
2. An inventory (or link to such an inventory) of existing hard assets, including at a minimum all Low Impact Development (LID) / Green Infrastructure (GSI) systems and trash capture devices.
3. An Operation, Maintenance, Rehabilitation, and Replacement Plan (Asset Management O&M Plan) with processes for:
    a. Prioritizing and scheduling O&M;

   b. Evaluating hard asset conditions and identifying the need for and carrying out rehabilitation and replacement of inventoried hard assets; and
   c. An evaluation or forecast of costs necessary for the implementation of a. and b. above, at least through the end of the current permit term.
4. A strategy for reporting on Asset Management Plan implementation to the Regional Water Quality Control Board (Water Board) annually.

Plans must be submitted to the Water Board with the 2025 Annual Report and implementation reports must be submitted annually beginning with the 2026 Annual Report. The MRP also requires reassessment and updates to Asset Management Plans on an as-needed basis, to address changing conditions and resources.

1.2 Asset Management Plan Purpose

Asset management planning creates an opportunity for municipalities to strategically manage their hard assets in a cost-efficient manner, while reducing risks of asset failure. Development of an asset management plan can help to improve the way work is done, knowledge is managed, and limited finances are used effectively.

The purpose of this Asset Management Plan (Plan) is to serve as a long-range O&M planning document that provides a rational framework for:

- Identifying and categorizing hard assets;
- Characterizing the conditions of hard assets;
- Prioritizing O&M activities;
- Managing and analyzing hard asset data; and
- Determining current and future costs.

The Plan is intended to guide efficient implementation of O&M for existing and future hard assets that serve a water quality function, such as bioretention areas, pervious pavement systems, and full trash capture devices, per Provision C.21 of the MRP. While hard assets discussed in this Plan may connect to stormwater conveyance systems, the hard assets pertaining to those stormwater conveyance systems are not included in the inventory of hard assets to be managed under this Plan.

1.3 Agency Description

Santa Clara Valley Water District (Valley Water) is a special district that provides flood protection, water supply, and stewardship to Santa Clara County. Valley Water completed a Stormwater Resource Plan identifying and ranking potential sites for green stormwater infrastructure (GSI). It included several projects that are still in the conceptual planning phases and have not yet progressed to the point of implementation. Valley Water also utilizes One Water Plans to integrate water quality

and watershed protection with water supply, flood protection, habitat protection, groundwater recharge, and other sustainable development principles and policies at the watershed scale for each of the main watershed areas in Santa Clara Valley. The One Water Plans are living documents that will continue to identify opportunities to increase GSI and related multi-benefit actions in each watershed. Through the Santa Clara Basin Stormwater Resource Plan[1] (EOA, Inc.; Environmental, Paradigm; Water, Lotus, 2019) and One Water Plans, Valley Water coordinates with Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) permittees to help implement their Green Infrastructure Plans.

As a special district, Valley Water does not have land use authority, nor does it own public rights of way such as streets or parking lots (other than access roads and parking lots associated with its own facilities) that can be retrofit with GSI. Valley Water has Joint Use Agreements with partnering agencies for public trail use. Valley Water has incorporated LID principles as early implementation demonstration and pilot projects at its facilities, which due to their history and purpose are not considered hard assets but rather equipment related to stormwater quality which is routinely inspected and maintained as needed outside of the Asset Management Plan (see Section 2.1.1).

Valley Water continues to evaluate its public projects for green infrastructure implementation (both regulated and non-regulated). Currently, Valley Water does not have any stormwater quality hard assets, but as regulated and non-regulated GSI projects are built they will be added to future Asset Management Plans. Additionally, Valley Water will coordinate with SCVURPPP permittees installing regulated and non-regulated GSI where jurisdictions overlap, and work with the agency that owns the property to clarify responsibilities, including any hard asset management.

As a Flood Management Agency Permittee, Trash Load Reduction Plans and percent reduction requirements are not applicable to Valley Water. However, under Provision C.10.c., Valley Water is required to install four trash booms in Santa Clara County. Trash booms are not considered a structural hard asset but are considered equipment related to stormwater quality and are routinely inspected, regularly maintained, and replaced as needed outside of this Asset Management Plan. They are referenced in Section 2.1.1.

[1] The Santa Clara Basin Stormwater Resource Plan is a planning document that uses a map-based approach to identify and prioritize local and regional Green Stormwater Infrastructure projects that can be implemented to improve local surface water quality through enhanced stormwater management (EOA, Inc.; Environmental, Paradigm; Water, Lotus, 2019).

2.0 Stormwater Quality Asset Inventory

For 2025, Valley Water does not have any hard assets installed across the Control Types and Asset Categories listed in Table 1 below. Section 4.0 provides details on how Valley Water will track and manage tabular and geospatial data for each hard asset as they become active.

Asset hierarchies help to make data management and determination of risk levels more efficient. Table 1 shows the hard asset hierarchy used for this Plan.

Control Type groups hard assets at a high level based on the source of their requirements (e.g., Provision C.3 or C.10) and whether they meet LID standards or not. Asset Category is the next grouping that refers to groups of hard assets that generally function similarly. Asset Class represents the specific type of hard assets that have been constructed. Finally, each hard asset in the inventory is categorized based on these hierarchical groupings. Table 1 below defines the top three levels of the hierarchy for stormwater quality-related structural controls included in this Plan. While Valley Water may not have each hard asset class described below, it will reference this table as hard assets become active.

Table 1. Asset Hierarchy Definition

Control Type	Asset Category	Asset Class
LID/GSI	Biotreatment Systems	- Bioretention lined with underdrain - Bioretention unlined with underdrain - Bioretention unlined w/o underdrain - Flow-through planter lined with underdrain - Tree well filter with bioretention soil with underdrain - Tree well filter with bioretention soil w/o underdrain - Green Roof
	Infiltration	- Infiltration trench - Proprietary media filter system - Subsurface infiltration system - Dry wells - Pervious pavement with underdrain - Pervious pavement w/o underdrain
	Capture and use systems	- Rainwater harvesting (e.g., cisterns) - Stormwater capture and use (regional)
Non-LID Treatment Systems	High flow rate media systems	- Media filters (e.g., Vault-based high flowrate media filters) - Media filter with vegetation (e.g., Tree-box-type high flowrate biofilters) - Sand filters
	Others	- Extended detention basin - Vegetated swale - Constructed wetlands - Hydromodification vault - Hydromodification basin - Water Quality Pond

Trash Controls[2]	Full Trash Capture systems/devices	- Hydrodynamic separator
		  ▪ Vortex separators (e.g., CDS)
		  ▪ Baffle boxes (NSBB/DSBB)
		- GSRD - Gross solids removal device
		- Netting devices
		- Surface inlet baskets/screens
		- Outflow screens (e.g., CPS)

	Partial Trash Capture Devices	- Auto retractable screen (ARS) - Fixed screen
	Other types of trash control devices	- Interceptors - Debris Rack - Media Filters

[2] As a Flood Management Agency Permittee, these types of Trash Controls are not applicable to Valley Water.

Each hard asset has components on which inspection and maintenance may be focused at any given time. For example, bioretention components include concrete curbs/braces, plants, mulch, soil, underdrain, and drain rock. For the purposes of this Asset Management Plan, a single hard asset is considered the entire water quality structure or system and all of its components. Thresholds for what triggers replacement of a hard asset will be based on consideration of the entire hard asset.

2.1.1 Equipment Related to Stormwater Quality

Equipment related to stormwater quality may include types of equipment such as trash receptacles and pet waste stations. While they have been included in the MRP as examples of hard assets, they do not meet the criteria to be considered or managed as structural controls (e.g., O&M is performed on an as-needed basis instead of having periodically scheduled inspections for assessment of condition and maintenance to achieve the minimum condition for performance, as described in Section 5.0). Additionally, Valley Water has trash booms and pilot demonstration LID features that better fit the description of stormwater quality equipment than hard assets. Therefore, they are not included in the Asset Management Procedures (Section 3.0).

Valley Water manages trash receptacles through its General Services Division for campus operations. Receptacle locations and conditions are managed for waste collection purposes only. Valley Water does not own or operate trash receptacles outside of campus facilities (i.e., along trails), as those are operated and maintained through Joint Use Agreements with the municipalities that manage the local trail systems.

Valley Water manages two trash booms independently and collaborates on two additional trash booms with the City of Palo Alto through a Memorandum of Agreement for permitting and maintenance. Trash booms are not examples of a hard asset and do not meet the criteria to be considered or managed as structural controls. They are maintained as needed.

There are several pilot demonstration LID features that were incorporated into the Valley Water Almaden Campus as early implementation projects before the first MRP. These include parking lot swales located in the North and West Parking lots of Headquarters Building, disconnected downspouts located at the Administration Building, and a sand filter located north of the Water Quality Lab. These features were built prior to the first C.3 requirements and were not built to the regional standards under the MRP. As early implementation measures, they do not meet the criteria to be considered or managed as structural controls, and these features are maintained as needed to achieve minimum condition performance.

3.0 Procedures

This section describes Valley Water's procedures to obtain and evaluate hard asset assessment data to inform a strategy for prioritizing and scheduling maintenance, rehabilitation, and replacement of inventoried hard assets. The process described here includes assessing hard asset condition and determining a risk-based prioritization strategy.

3.1 Asset Condition Assessment

Asset condition inspections and assessments inform immediate and future O&M needs for optimal performance. In addition, condition assessments rank hard asset criticality as described in Subsection 3.2.3.

Stormwater volume and pollutant load reduction, necessary to comply with applicable MRP provisions, are evaluated and incorporated as part of the siting, design, and installation of stormwater quality hard assets such as full trash capture devices and bioretention areas. If a hard asset is impeded in some way, then the intended design-based performance could be affected. The standard for management of stormwater quality related hard assets, as expressed in MRP Provision C.21.b.i.(3)(b)(i), is to maintain "the minimum condition necessary to achieve minimum performance level(s) for each type of hard asset".

Valley Water developed and will utilize the process detailed below for evaluating hard asset condition and identifying the need for, and carrying out, as appropriate, the routine/corrective maintenance, rehabilitation, and replacement of inventoried hard assets (per Provision C.21.b.i.(3)(b)). The condition assessment approach is specific to the hard asset control type and will be conducted as a part of the implementation of this Asset Management Plan, once hard assets are installed. The approach considers factors such as design, capacity, condition, and function relative to the hard asset's design, intended operating conditions, and intended function.

3.1.1 Data Collection Process

Valley Water will collect data on the condition of all hard assets within the inventory. The process will involve field inspections conducted by a combination of maintenance and inspection staff depending on the oversight of the particular hard asset. Data will be collected using electronic forms and stored in Valley Water's database used for managing O&M as later described in Section 6.0. The initial data collection process will be completed within one year, and no prioritization has been established for the order in which data will be collected.

3.1.2 Parameters to Evaluate Asset Condition

Tables 2, 3, and 4 describe the parameters that will be used for evaluating the condition of hard assets. While Valley Water may not have each hard asset class listed below, it will reference this table as hard assets become active. Table 2 outlines the parameters for LID/GSI. Table 3 outlines the parameters for Non-LID assets. Finally, Table 4 shows the parameters for trash control assets. Only applicable parameters will be rated for each asset class and separate score ranges will be applied. The parameters and scoring are subject to change as Valley Water's asset management program evolves based on lessons learned and adaptive management.

Table 2. LID/GSI Condition Assessment Parameters

		Parameters							
		Plant Health	Mulch	Irrigation System	Trash /Debris	Erosion/ Sedimentation	Structure	Drainage & Standing Water	Clogging or Blockage
Biotreatment Systems	Bioretention lined with underdrain	X	X	X	X	X	X	X	X
	Bioretention unlined with underdrain	X	X	X	X	X	X	X	X
	Bioretention unlined w/o underdrain	X	X	X	X	X	X	X	X
	Flow-through planter lined with underdrain	X	X	X	X	X	X	X	X
	Tree well filter with bioretention soil with underdrain	X	X	X	X	X	X	X	X
	Tree well filter with bioretention soil w/o underdrain	X	X	X	X	X	X	X	X
	Green Roof	X		X			X	X	X
Infiltration	Infiltration trench				X	X	X	X	X
	Subsurface infiltration system				X		X	X	X
	Dry wells				X		X	X	X
	Pervious pavement with underdrain				X	X	X	X	X
	Pervious pavement w/o underdrain				X	X	X	X	X
Capture and Use Systems	Rainwater harvesting (e.g., cisterns)				X		X		X
	Stormwater Capture and Use (regional)				X		X		X

Table 3. Non-LID Condition Assessment Parameters

		Parameters							
		Plant Health	Mulch	Irrigation System	Trash/Debris	Erosion/ Sedimentation	Structure	Drainage & Standing Water	Clogging or Blockage
High Flow Rate Media Systems	Media filters (e.g., Vault-based high flowrate media filters)				X		X	X	X
	Media filter with vegetation (e.g., Tree-box-type high flowrate biofilters)	X	X	X	X	X	X	X	X
	Sand filters				X	X	X	X	X
Other	Extended detention basin				X	X	X	X	X
	Vegetated swale	X		X	X	X	X	X	X
	Constructed wetlands	X			X	X	X		X
	Hydromodification vault				X		X	X	X
	Hydromodification basin				X	X	X	X	X
	Water Quality Pond				X		X		X

Table 4. Trash Control Devices Condition Assessment Parameters

		Parameters								
		Screen Plugging	Screening Portion Capacity	Water Depth	Vectors	Structure	Net	Net Attachment	Net Capacity	Net Attachment Structure
Full Trash Capture Systems/Devices	Hydrodynamic separator	X	X	X	X	X				
	GSRD - Gross solids removal device	X	X	X	X	X				
	Netting devices			X	X	X	X	X	X	X
	Surface inlet baskets/screens	X	X	X	X	X				
Partial Trash Capture Devices	Outflow screens (e.g., CPS)	X	X	X	X	X				
	Auto retractable screen (ARS)	X	X	X	X	X				
Other types of trash control devices	Fixed screen	X	X			X				
	Interceptors	X	X	X	X	X				
	Debris Rack	X	X	X	X	X				
	Media Filters	X	X	X	X	X				

The condition assessment will evaluate the parameters associated with each of the hard assets, as indicated in Tables 2, 3, and 4. Valley Water grouped hard assets with similar sets of parameters to create a consolidated set of condition assessment scoring tables. Valley Water will evaluate the overall condition for each individual hard asset based on the condition assessment parameters. Figure 2 shows the condition assessment scoring level rubric that will be used, with descriptions for each scoring level.

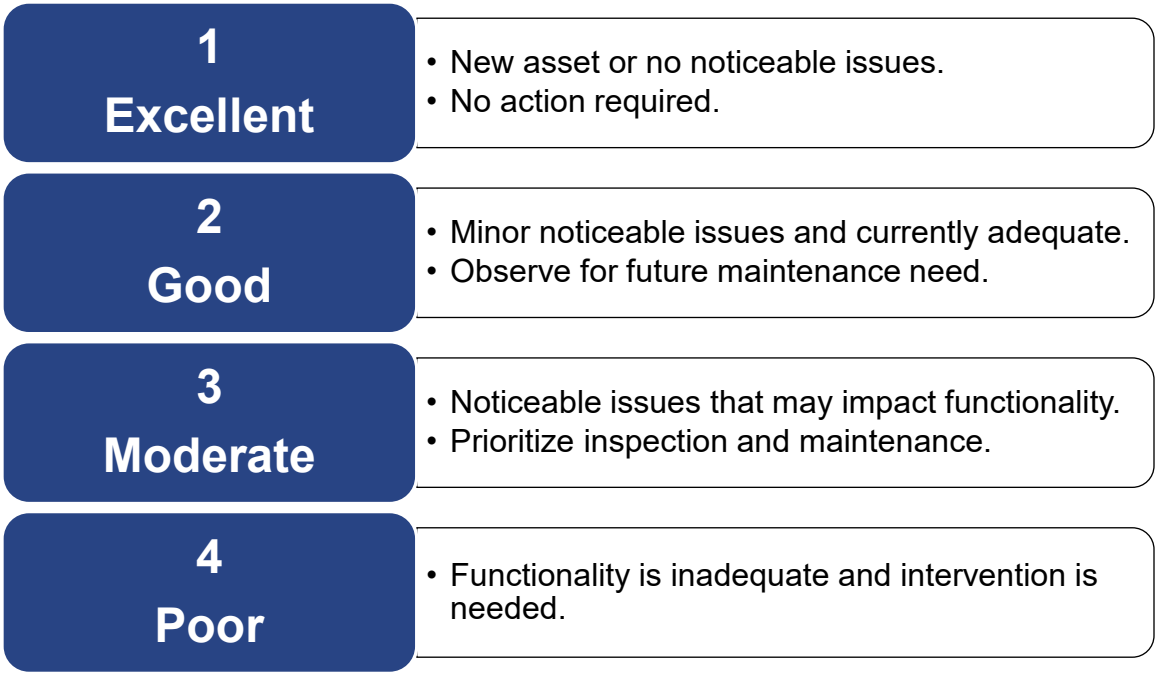

Figure 1. Condition Assessment Rating Rubric

3.2 Risk Evaluation

Evaluating risk can ultimately inform prioritization strategies for efficient use of limited resources. Hard assets that are determined to be at higher risk of failure can be prioritized for maintenance, allowing greater access to necessary resources for maintaining their condition. Hard assets with lower risk of failure will still need access to resources for maintenance but at a lower level or frequency. For asset management planning, an initial risk level is identified for setting frequencies of inspection and maintenance activities for hard assets. The risk level may be periodically evaluated and updated along with hard asset inspection and maintenance frequencies, based on data collection or new information. The two primary components for determining risk are likelihood of failure and consequence of failure.

3.2.1 Likelihood of Failure

Likelihood of Failure (LoF) is a metric, or consideration, based on known or collected data or anecdotal information. A hard asset's functional condition can be the sole basis for the LoF, but if more information is available, it can be determined as a composite score/consideration that includes information such as hard asset age, performance, asset residual life, maintenance history, and capacity. Given that a hard asset's condition is a point-in-time assessment, one assessment may not be representative of

the hard asset's actual LoF, if that hard asset is exposed to variable external conditions affecting its performance. For example, trash loads can be variable within a given trash management area. If a connector pipe screen is inundated with trash prior to a condition assessment, its observed condition may not be representative for that particular location and thus may not be a good indicator of overall frequency needs. Utilizing a composite score or set of observations can help offset this potential for over-conservative LoF classification. Valley Water identified the potential LoF considerations shown in Table 5 below.

Table 5. Likelihood of Failure Considerations per Control Type

Potential LoF Parameters	Applicable Control Type
Condition Assessment	All
Location in high pedestrian traffic area	GSI/LID & Non-LID
Presence of pumps	GSI/LID & Non-LID
Location in area with significant vegetative debris	Trash Controls

3.2.2 Consequence of Failure

Consequence of failure (CoF) is a measure of the magnitude of impact (e.g., on public safety, water quality, and permit compliance) a hard asset will have if it fails. Considering CoF helps guide municipalities to which hard assets should have priority and demonstrate why. For example, should the CoF for a hard asset be a threat to public safety, that hard asset would likely be considered to have a more critical need for resources. CoF can be a consideration or score that is based on one or a combination of parameters, similar to LoF. Table 6 lists potential parameters for CoF scoring/consideration.

Table 6. Consequence of Failure Parameters

Potential CoF Parameters
Size of Drainage Area (i.e. small, medium, or large area with larger resulting in greater impact to water quality)
Cost of Repair/Replacement (small, medium, or large size asset)

3.2.3 Risk

Risk analysis is conducted by assessing a combination of LoF and CoF. Once the LoF and CoF is determined for each hard asset, Valley Water will evaluate overall risk by combining LoF and CoF scores utilizing the equation shown in Figure 3. Valley Water will allow room for modifications to the risk analysis approach and outputs based on best professional judgement (e.g., historical knowledge that doesn't align with scores).

Figure 2. Risk Analysis Calculation

When combined with a risk analysis, LoF and CoF considerations/scores allow for development of a risk profile or matrix. Once completed, Valley Water will utilize the profile as a guide for prioritizing inspection and maintenance frequencies for hard assets.

3.3 O&M Prioritization Strategy

It is generally not cost-effective and often infeasible to maintain all hard assets at the same frequency and to the same extent. Even with sufficient resources, implementing a homogenous maintenance regime may not be the best use of public funds. The risk-based approach to prioritizing and scheduling actions is a more cost-effective means of maintaining hard asset conditions. The risk-based approach described in the previous section establishes the assignment of hard asset priorities based on the likelihood and consequence of failure for each. This section identifies the strategy for implementing O&M per the risk-based analysis for each hard asset.

3.3.1 Prioritization and Scheduling

Valley Water will evaluate the findings from the risk analysis to inform a strategy for prioritizing and scheduling maintenance, rehabilitation, and replacement of inventoried hard assets. O&M actions will be assigned based on the risk category (e.g. High, Medium, or Low) identified for each hard asset.

Scheduling and frequency will need to consider several factors assessed against the hard asset risk analysis. Once the entire inventory has been analyzed and assessed for condition, Valley Water will evaluate an approach to scheduling O&M based on funding and resource availability. In addition, Valley Water will consider the geographical

locations for all hard assets and the internal responsibility assigned for O&M. For example, hard assets may be maintained by different departments, and each has other non-stormwater quality hard assets for which they are responsible. O&M scheduling may consider grouping hard assets by department and geographical location for more efficient use of resources.

3.3.2 Adaptive Management

Valley Water will periodically reassess and update the Asset Management Plan and O&M Prioritization Strategy on an as-needed basis. Changing conditions and resources will be considered and modifications to risk analyses, O&M prioritization, and scheduling frequencies may be made. The first year of implementation of the Asset Management Plan will be an opportunity to begin to implement the O&M strategy and refine internal processes.

4.0 Stormwater Quality Asset Data Management

Asset data management is an integral part of the overall asset management program for Valley Water. Asset data is needed for identifying and categorizing hard assets; characterizing the conditions of hard assets; prioritizing O&M activities; and determining current and future costs.

SCVURPPP developed an interactive data portal for Stormwater Treatment Measures (STMs) that align with the hard asset Control Types GSI/LID and Non-LID. The STM Data Portal (Data Portal) includes parcel-based, right of way, and regional public projects and has an integrated map showing the project locations. The Data Portal serves as an online GSI/LID and Non-LID tracking system to obtain, store, and access countywide Provision C.3-regulated and non-regulated project data. The system also allows projects, control measures, land use type, and acres of treatment to be visualized spatially on the web. It also serves as the tracking and mapping tool that includes a component available to the public as required by Provision C.3.j.ii.(1)(e). As part of Asset Management Plan implementation, SCVURPPP will be updating the Data Portal and associated resources to accommodate additional asset tracking and reporting information on behalf of its member agencies.

Currently, Valley Water has no hard assets within the local inventory database. However, hard assets will be added to the local database after installation. This data will be used by appropriate inspection and/or maintenance staff to perform an initial condition assessment to determine the frequencies and risk. Appropriate divisions will be included, based on where systems are installed. This data will be shared with SCVURPPP to be added to the Data Portal to geographically map the systems. Valley Water will coordinate with SCVURPPP to identify any additional data collection needs.

5.0 Current and Future Costs and Funding Sources

Asset management planning can guide cost effective use of resources for ongoing O&M programs. In addition to strategic prioritization of O&M, it is useful to understand hard asset-related costs which directly impact the amount of resources that can be allocated. Furthermore, the ongoing asset management planning and adaptive management will also incur costs. For the purposes of this Asset Management Plan, Valley Water considered costs related to the processes for:

1. Prioritizing and scheduling O&M activities;
2. Evaluating the current condition, and identifying the need for maintenance, rehabilitation and replacement of inventoried hard assets;
3. Carrying out the routine maintenance, rehabilitation, and/or replacement of inventoried hard assets; and
4. Reevaluating risk and prioritization as part of adaptive management.

Valley Water will periodically compare cost projections with available funding sources to determine the best way to fund the operation, maintenance, rehabilitation, and replacement of inventoried hard assets.

Per Provision C.20 of the MRP, Permittees are required to report costs of permit implementation annually, at the end of each fiscal year, and estimate costs of implementation for the subsequent fiscal year. Valley Water will use the Bay Area Cost Reporting Framework to estimate and report costs for permit implementation, including implementation of asset management requirements. The efforts described in this section to evaluate and forecast costs to implement the Asset Management Plan will be coordinated with and inform Provision C.20 cost reporting but will be performed by Valley Water specifically to plan and allocate resources to asset management tasks.

5.1 Cost Evaluation for Asset Management Planning and Implementation

While Valley Water does not currently own hard assets of these types, an agreement exists between the County of Santa Clara and Valley Water for maintenance of some County-owned stormwater quality hard assets built as part of the Permanente Creek Flood Protection Project located at Rancho San Antonio County Park. The six hard assets include five bioretention areas and one pervious pavement. Per the maintenance agreement and in coordination with the County, Valley Water will be conducting inspections and maintenance for three of the bioretention areas[3] and submitting data to the County. Since the County owns the park, required hard asset reporting will be completed by the County. However, the cost evaluation for the anticipated inspection and maintenance activities performed by Valley Water is included in this plan along with

[3] See the project O&M Plan for additional information on the bioretention areas (i.e., location).

features anticipated to be installed as an element of other projects within this current permit term.

Over the course of the first year of Asset Management Plan implementation, Valley Water will conduct condition assessments, perform a risk analysis, and prioritize and schedule O&M actions of the shared hard assets. As part of the development of this Asset Management Plan, Valley Water evaluated the level of effort necessary to complete each of these tasks in Year 1 (FY 25/26) when compared to the total asset inventory. Valley Water also estimated future costs for FY 26/27, the last year of the MRP term. To determine future costs, Valley Water evaluated the level of effort for each activity per year. The first year will likely have higher costs due to the initial startup activities. The results of the cost evaluation are shown in Table 7.

Table 7. Cost Evaluation for Current Permit Term

Activity	Total Costs	
	FY 25/26	FY 26/27
Condition Assessments	$1,423	$691
Risk Analysis	$3,804	$2,517
Prioritization and Scheduling of O&M	$1,432	$1,380
Conducting O&M Activities	$1,062	$391

Without completing the first three activities listed in Table 7, Valley Water cannot adequately assess the estimated costs for operation, routine maintenance, and rehabilitation. However, Valley Water will consider evaluating and forecasting these costs using factors such as cost per hard asset or cost per square foot that can be applied to estimate future costs and that consider inventory growth, changing hard asset conditions, and escalation.

It is worth noting that rehabilitation costs are more difficult to estimate because rehabilitation needs depend on many variables. Stormwater quality hard assets may need rehabilitation due to unpredictable external events, lack of maintenance, or other factors. Implementing corrective maintenance as part of the O&M strategy can potentially mitigate this issue.

Replacement costs are also challenging to estimate for many of the hard assets considered in this plan, because they are relatively new and there is limited data available related to the longevity of these hard assets. However, using the installation date for each hard asset, Valley Water will assume an end-of-life scenario and estimate a useful life for each asset class. Then, Valley Water will estimate the expected replacement cost based on the cost of installation escalated to the year in which the hard asset may ultimately fail.

6.0 Asset Management Reporting Strategy

Valley Water will report on Asset Management Plan implementation annually, starting with the 2026 Annual Report. Valley Water will provide an inventory of all hard assets accounted for in the Asset Management Plan as hard assets are installed.

At a minimum, for each hard asset in the inventory, Valley Water will provide the following information:

- Asset category;
- Relevant design information;
- Contributing drainage area;
- Location;
- Condition; and
- O&M need.

Based on periodic inspections, either by municipal or contracted staff, Valley Water will update the condition and O&M need for inclusion with the annual report. The inspection frequencies and updates will be tied to the risk analysis and prioritization process described in Section 5.0.

7.0 Definitions

The following are definitions of terms used throughout this Asset Management Plan.

- **Asset Category** – groups of assets that are functionally similar
- **Asset Class** - specific types of assets that are represented in the inventory
- **Asset Condition** - the physical state of the asset determined based on periodic inspections
- **Asset Inventory** – the list of publicly owned structures serving a water quality function that are managed, operated, and maintained
- **Component** – a single physical part of an asset that supports its functionality
- **Consequence of Failure** – measure of the magnitude of impact(e.g., on public safety, water quality) an asset will have if it fails
- **Control Type** – high level groupings of assets based on the source of their requirements (e.g., Provision C.3 or C.10) and whether they meet LID standards or not
- **Corrective Maintenance** – activities conducted to repair, rehabilitate, or replace failing parts of an asset, where failures are not significant enough to trigger full replacement of the asset
- **Cost of Failure** – total cost of replacing or significantly rehabilitating an asset to restore function, including the cost of mitigating any impacts associated with its failure
- **End of Life** – the date or point in time at which the asset is no longer expected or considered to be functioning as intended
- **Green Infrastructure Plans** – These plans describe a permittee's methodology to identify and prioritize areas to implement Green Stormwater Infrastructure. Plans were required to be developed under the San Francisco Bay Municipal Regional Stormwater (NPDES) Permit.
- **Hard asset** – physical structures, including all associated or integrated components, that serve a water quality function
- **Life Cycle Cost** – an aggregated set of costs for each stage of an asset's life cycle that is used to identify cost-effective interventions to make throughout its life
- **Likelihood of Failure** – measure of the probability that an asset will fail due to considerations such as asset condition, function, location, or age
- **Rehabilitation** – Non-routine maintenance activities that pertain to the majority of the system or include excavation and/or construction of new components
- **Repair** – Spot treatment to restore isolated damage
- **Replacement** – removal of all or a majority of the asset and reconstruction of the same or similar asset to fulfill its intended function
- **Risk** – the combined consideration of likelihood of failure and consequence of failure

- **Routine Maintenance** – ongoing activities conducted during all or most maintenance visits that may include minor repairs but are not significant enough to be considered rehabilitations, replacements, or upgrades.
- **Upgrades** – enhancements made to an asset to improve functionality and performance or limit, reduce, or avoid asset failure.

8.0 References

EOA, Inc.; Environmental, Paradigm; Water, Lotus. (2019, August 20). *Santa Clara Basin Stormwater Resource Plan.* Retrieved from Santa Clara Valley Urban Runoff Pollution Prevention Program: https://scvurppp.org/swrp/

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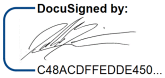
John Bourgeois JBourgeois@valleywater.org Deputy Operating Officer Security Level: Email, Account Authentication (None)	DocuSigned by:  C48ACDFFEDDE450... Signature Adoption: Uploaded Signature Image Using IP Address: 64.190.101.20	Sent: 9/30/2025 4:13:09 PM Viewed: 9/30/2025 4:13:56 PM Signed: 9/30/2025 4:14:09 PM

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Editor Delivery Events	Status	Timestamp

Agent Delivery Events	Status	Timestamp

Intermediary Delivery Events	Status	Timestamp

Certified Delivery Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp

Witness Events	Signature	Timestamp

Notary Events	Signature	Timestamp

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