

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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TASK ORDER FORM

Date/Start Date: July 1, 2019
Consultant Name: EOA, Inc.
Contract: Countywide Water Pollution Prevention Program Technical Support – On-Call Contracts
Task Order No.: EOA-09
Task Order Name: Municipal Stormwater NPDES Permit Compliance Assistance
Scope of Work: General Technical Support, Subcommittee Support, Training, Annual Reporting, Trash, Mercury & PCBs. See attached scope of work.
Deliverables: See attached scope of work
Budgeted Cost: Per attached Fiscal Year 2019-20 scope of work, not to exceed \$809,506.
Completion Date: September 30, 2020

The parties indicated herein agree to execute this Task Order per the scope indicated above. No payment will be made for any work performed prior to the execution of this Task Order. Unless otherwise indicated, receipt of this executed Task Order is your Notice to Proceed with the work specified herein.

C/CAG

EOA, Inc.

Sandy Wong
Executive Director

Date

Date

FY 2019/20
Municipal Stormwater NPDES Permit
Compliance Assistance

Scope of Work and Budget

Prepared for the
San Mateo Countywide
Water Pollution Prevention Program
(a C/CAG program)



Prepared by EOA, Inc.



June 4, 2019

INTRODUCTION

EOA, Inc. (EOA) prepared this scope-of-work and budget for the San Mateo Countywide Water Pollution Prevention Program (Countywide Program or SMCWPPP). SMCWPPP is a program of the City/County Association of Governments of San Mateo County (C/CAG). The scope and budget are for EOA to assist the Countywide Program to help its San Mateo County Permittees to comply with municipal stormwater permit requirements found in the reissued NPDES Permit No. CAS612008, commonly referred to as the Municipal Regional Permit (MRP). The following sections describe EOA's tasks, budgets, and deliverables for FY 2019/20 (i.e., July 2019 – June 2020).¹

Table 1 and Exhibit A summarize the tasks and budgets. Exhibit A includes subtasks, estimated labor hours and hourly rates for EOA staff, and planning-level subcontractor and expense budgets. It should be noted that the actual distribution of hours and subcontractors/expenses within and among tasks may vary. EOA will conduct all work on a time and materials basis in accordance with the Agreement for Services between EOA, Inc. and C/CAG dated August 13, 2015 (amended March 8, 2018). The total budget will not be exceeded without C/CAG's authorization.

Table 1. Summary of Tasks and Budgets.

Task No.	Description	Budget
SM11	General Support to Program Manager	\$132,224
SM12	Subcommittee Support	\$163,808
SM13	Training	\$61,240
SM14	Trash Load Reduction	\$305,806
SM15	Mercury and PCBs Load Reduction	\$108,028
SM16	Annual Reporting	\$38,400
Total Budget:		\$809,506

Note: See Exhibit A for more details.

¹ Please note that EOA prepared a separate document that provides a scope and budget for WY 2020 water quality monitoring tasks.

TASK SM01 – GENERAL SUPPORT TO PROGRAM MANAGER

Jon Konnan will continue to serve as the task leader for General Support for Program Manager as part of continuing his overall role as EOA's project manager for providing municipal stormwater permit compliance support to C/CAG. Jon will be assisted by other EOA staff as appropriate (e.g., component leaders). Subtask descriptions, deliverables and budgets are provided below.

SUBTASK SM11.01: GENERAL SUPPORT

EOA will continue to provide general support to assist C/CAG's Program Manager in running the Countywide Program, ongoing review of subtask budgets and deliverables, scheduling committee meetings, strategic planning, ensuring that permit compliance dates and deliverables are met, and other types of general technical support. This task includes on-call assistance to municipal staff members by responding to their emails and telephone calls. This task also includes overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff working on various components of the Countywide Program and preparation of invoices detailing the work completed each month by subtask.

Deliverables:

- General technical and regulatory support to C/CAG's Program Manager.
- On-call communications with municipal staff.
- Overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff working on various components of the Countywide Program and preparation of invoices detailing the work completed each month by subtask.

Budget: \$42,272

SUBTASK SM11.02: STORMWATER COMMITTEE SUPPORT

EOA will continue to support to the Program Manager in facilitating C/CAG's Stormwater Committee (which generally meets every other month). The budget for this subtask assumes that one EOA manager will attend three of the FY 2019/20 meetings and prepare and give a presentation at each of these three meetings.

EOA will also assist the Program Manager to facilitate two meetings of the Countywide Program's Stormwater Committee ad-hoc permit implementation workgroup. This workgroup generally focuses on providing guidance from higher-level municipal staff on implementation of priority permit provisions including trash controls, green infrastructure (GI), and mercury and PCBs controls and associated compliance issues. The budget for this subtask assumes that one EOA manager will prepare for and attend two FY 2019/20 workgroup meetings.

Deliverables:

- One EOA manager will attend three of the FY 2019/20 Stormwater Committee meetings and prepare and give a presentation at each of these three meetings.

- One EOA manager will prepare for and attend two FY 2019/20 meetings of the Stormwater Committee ad-hoc permit implementation workgroup.

Budget: \$13,260

SUBTASK SM11.03: BASMAA ACTIVITIES SUPPORT

EOA will continue to provide support to the Program Manager regarding BASMAA activities and generally assist the Program Manager with coordination between BASMAA and Countywide Program activities. This will include support for monthly Board of Directors (BOD) meetings, including review and comment on agenda items, and participation in selected meetings or portions of meetings.

Deliverables:

- Review and comment on agenda packages and participation in selected monthly BASMAA BOD meetings or portions of meetings.

Budget: \$10,568

SUBTASK SM11.04: BASMAA REGIONAL PROJECTS PLANNING SUPPORT

EOA will continue to provide as needed support to the Program Manager in planning for and supporting implementation of BASMAA regional projects, including preparation of budget summaries and projections, coordinating C/CAG's role and tracking C/CAG's budget share of all BASMAA projects to which C/CAG is a participant, and participating in review of and comment on BASMAA documents, including annual reporting materials. Please note that the EOA budget does not include C/CAG's share of BASMAA regional project budgets.

Deliverables:

- Spreadsheets summarizing budgets and projected budgets.
- Coordination of C/CAG's role and tracking C/CAG's budget share of all BASMAA projects to which C/CAG is a participant.
- Review of and comment on BASMAA documents, including Annual Reporting materials.

Budget: \$10,568

SUBTASK SM11.05: COORDINATION AND INTEGRATION

This subtask addresses the need for general support activities not covered by other subtasks, many of which are related to optimizing coordination and integration among all permit compliance related activities performed by C/CAG staff and its consultants. As needed, EOA will continue to coordinate with the Program Manager and other C/CAG municipal stormwater permit compliance consultants via meetings, conferences calls and emails. As directed by the Program Manager, EOA will also perform peer reviews of selected draft documents prepared by other permit compliance support consultants (e.g., documents related to public outreach strategic planning, GI planning, and Reasonable Assurance Analysis). In addition, EOA will work with the Program Manager to annually revise and update EOA's

tasks and budgets. This subtask also includes other types of miscellaneous support (e.g., grant applications), as needed and feasible within the available budget.

Deliverables:

- Coordination with the Program Manager and other C/CAG municipal stormwater permit compliance consultants via meetings, conferences calls and emails.
- As directed by the Program Manager, peer review of selected draft documents prepared by other permit compliance support consultants.
- Annual update of EOA's tasks and budgets (spreadsheets and narrative).
- Other types of miscellaneous support, as needed and feasible within the available budget.

Budget: \$20,008

SUBTASK SM11.06: PERMIT RE-ISSUANCE SUPPORT

EOA will provide assistance and support to the Countywide Program during the process to reissue the MRP, which expires December 2020. During FY 2019/20, tasks will include:

- Facilitating the MRP 3 trash controls workgroup (shared budget: one-third SMCWPPP and two-thirds SCVURPPP).
- Facilitating the MRP 3 water quality monitoring workgroup (shared budget: one-third SMCWPPP and two-thirds SCVURPPP).

Other potential FY 2019/20 tasks to be conducted on an as needed basis (with approval from the Program Manager) include:

- Reviewing and assisting with preparation of comments on draft versions of the reissued permit.
- Summarizing important changes in the draft reissued permit and implications for Permittee compliance activities.
- Preparing summary/status documents and presentations for the Stormwater Committee.
- Facilitating special meetings of the Stormwater Committee's Permit Implementation Workgroup to receive feedback on key reissuance issues.
- Participating in a regional MRP reissuance Steering Committee on behalf of SMCWPPP.
- Participating in other regional or countywide workgroups focusing on priority permit compliance areas (e.g., mercury and PCBs).
- Participating in Regional Water Board workshops and hearings related to permit reissuance.
- Preparing talking points for Permittee representatives participating in Regional Water Board permit reissuance hearings.
- Participating in other meetings with BASMAA and/or Regional Water Board staff, as needed.

Deliverables:

- Facilitating the MRP 3 trash controls and water quality monitoring workgroups (shared budgets: one-third SMCWPPP and two-thirds SCVURPPP).
- Other potential FY 2019/20 tasks to be conducted on an as needed basis (with approval from the Program Manager).

Budget: \$35,548

TASK SM02 – SUBCOMMITTEE SUPPORT

SMCWPPP's subcommittees provide regular forums for engagement with San Mateo County Permittee staff on key permit implementation issues. During FY 2019/20, EOA will continue to assist with planning and facilitating subcommittee/workgroup meetings, including working with chairs to develop agendas and discussion materials, participating in meetings, developing and giving presentations on technical and regulatory information, and preparing meeting summaries. Most SMCWPPP subcommittees are chaired by a staff from one of the San Mateo County Permittees who volunteered for the position. EOA will continue to work with subcommittee chairs to develop meeting agendas so that the meetings will address the most critical aspects of MRP compliance from the municipal staff viewpoint.

Each subcommittee will be supported by an EOA staff with appropriate specific expertise, with overall coordination provided by Jon Konnan, EOA's project manager for C/CAG. The below sections provide a description of each subcommittee support subtask, the lead EOA staff, deliverables, and budget.

SUBTASK SM12.01: MUNICIPAL MAINTENANCE SUBCOMMITTEE

EOA will facilitate and provide staff support to the Municipal Maintenance Subcommittee, with a focus on compliance with MRP Provisions C.2 (Municipal Operations), C.7.a (Storm Drain Inlet Marking), and portions of C.10 (Trash Controls). Kristin Kerr, P.E., will continue to serve as EOA's lead for facilitation of the Municipal Maintenance Subcommittee and related work under this subtask.

EOA will facilitate semi-annual (twice per year) meetings of the Municipal Maintenance Subcommittee, including working with the chair to develop meeting agendas, prepare meeting materials (e.g., handouts and presentations), participate in the meetings, and prepare meeting summaries that include any action items agreed upon during the meeting. Municipal Maintenance Subcommittee meetings are typically one hour and held over lunchtime. A portion of the meeting time is dedicated to information sharing, an important function for this subcommittee. Maintenance staff from the various municipal agencies in San Mateo County ask questions, share problems and solutions, discuss issues, and share important information and feedback at the meetings.

Between meetings, EOA will provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the subcommittee via email (e.g., training opportunities external to the Countywide Program), and maintain the subcommittee contact list. EOA staff will also participate on behalf of San Mateo County Permittees in the BASMAA Municipal Operations committee. In addition, under this subtask EOA will prepare the content for the section of the SMCWPPP Annual Report that addresses MRP Provision C.2.

EOA finalized model full trash capture device operation and maintenance (O&M) verification program documents during FY 2015/16, an O&M verification tracking spreadsheet in FY 2016/17, and a pesticides tracking workbook in FY 2017/18 that is updated annually. In FY 2019/20, we anticipate that the Municipal Maintenance Subcommittee will continue to be a forum for discussing full trash capture device O&M and related issues, Best Management Practices (BMPs) during municipal operations, and training opportunities. In addition, the Municipal Maintenance Subcommittee is anticipated to be a primary forum for discussing GI O&M and related concerns and issues.

Deliverables:

- Facilitation of semi-annual (twice per year) Municipal Maintenance Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the subcommittee of pertinent information, and updates to the subcommittee contact list.
- Participation on behalf of San Mateo County Permittees in the BASMAA Municipal Operations committee, as needed.
- SMCWPPP Annual Report content addressing MRP Provision C.2.

Budget: \$11,460

SUBTASK SM12.02: NEW DEVELOPMENT SUBCOMMITTEE

EOA will continue to support the Countywide Program's New Development Subcommittee (NDS), with a focus on compliance with MRP Provisions C.3 (New Development), C.6 (Construction), and C.13.a (Architectural Copper). New Development Subcommittee meetings are typically held on the second Tuesday of the month, quarterly. Attendees are generally staff from planning, building, engineering, and public works departments from the various municipalities in San Mateo County. Typical agenda items include developing or updating Countywide Program guidance documents, checklists and other information related to development projects, GI, and updates on countywide and regional activities. The NDS meetings provide opportunities for San Mateo County Permittee staff to ask questions, share problems and solutions, discuss issues, and share important information and feedback among themselves.

Peter Schultze-Allen, CPSWQ, BFQP, will continue to serve as EOA's lead for facilitation of the NDS and related work under this subtask. Jill Bicknell, P.E., will continue to work closely with Peter on this task. Kristin Kerr, P.E. will also provide technical assistance on construction-related topics and as EOA's lead for the Municipal Maintenance Subcommittee will coordinate on GI maintenance issues.

EOA will continue to facilitate quarterly NDS meetings, including working with the chair to develop meeting agendas, preparing meeting materials (e.g., handouts and presentations), participating in the meetings, and preparing meeting summaries that include any action items agreed upon during the meeting. Between meetings, EOA will continue to provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the NDS via email (e.g., training opportunities external to the Countywide Program), and maintain the NDS contact list. EOA staff will also participate on behalf of San Mateo County Permittees in the BASMAA Development Committee and other pertinent Committee and Work Group meetings (e.g., Biotreatment Soil Specification Work Group). In addition, EOA will prepare the content for the section of SMCWPPP's

Annual Report that addresses MRP Provisions C.3, C.6 and C.13.a. During the NDS meetings, EOA will also provide updates on the MRP reissuance process, with focus on Provisions C.3, C.6, and C.13.a.

Beginning in FY 2019/20, SMCWPPP's Green Infrastructure Technical Advisory Committee (GI TAC) will be merged into the NDS. EOA will add the former GI TAC members to the NDS distribution and incorporate GI-related topics into the NDS agenda as needed. For example, at the NDS meetings EOA will assist Permittee staff with questions and issues related to implementation of their GI Plans. EOA will continue to update development project review checklists, update biotreatment soil specification information and guidance, and print copies of the C.6 inspection forms and other materials as needed to assist the Permittees. EOA will also continue to submit an annual report to the County Mosquito Abatement District on behalf of the Permittees (submitted each year by September 30). In addition, updates to the development pages on the Countywide Program website will continue to be submitted as needed.

During FY 2019/20, EOA will also continue to assist with any updates needed to the Countywide Program's guidance documents, including completing any further minor updates needed to the C.3 Regulated Projects Guide (C3RPG Version 6.0, June 2019) to make it consistent with any updates to the Green Infrastructure Design Guide (GIDG Version 1.0, May 2019) made by other C/CAG consultants. In general, EOA will support other C/CAG consultants as needed in their efforts to update the GIDG as needed.

Deliverables:

- Facilitation of quarterly NDS meetings, including developing agendas, other meeting materials, and meeting summaries. Addition of the former GI TAC members to the NDS distribution and incorporation of GI-related topics into the NDS agenda as needed. Updating NDS members on the MRP reissuance process, with focus on Provisions C.3, C.6, and C.13.a.
- On-call communications with municipal staff, periodic communications to the NDS of pertinent information, and updates to the NDS contact list.
- Participation on behalf of San Mateo County MRP Permittees in the BASMAA Development Committee, development-related sections of the BASMAA Board meetings, and the MRP 3 GI/C.3 workgroup.
- Countywide Program Annual Report content for the section addressing MRP Provisions C.3, C.6 and C.13.a.
- Printing of Construction Inspection Forms for Permittees.
- Revisions to development guidance documents and materials, including any further updates to the C3RPG as part of supporting further updates of the GIDG made by other C/CAG consultants.
- Biotreatment soil specification updates (coordinated with BASMAA and customized for SMCWPPP as needed).
- Annual Report to the County Mosquito Abatement District.
- Updates as needed to the development pages on the Countywide Program website.

Budget: \$84,726

SUBTASK SM12.03: COMMERCIAL/INDUSTRIAL/ILLICIT DISCHARGE SUBCOMMITTEE

EOA will continue to support the Countywide Program’s Commercial / Industrial/ Illicit Discharge (CII) Subcommittee, with a focus on compliance with MRP Provisions C.4 (Industrial and Commercial Site Controls), C.5 (Illicit Discharge Detection and Elimination), and C.13.b and c (Copper Controls). Kristin Kerr, P.E., will continue to serve as EOA’s lead for facilitation of the CII Subcommittee and related work under this subtask.

Formerly there was a Memorandum of Agreement (MOA) between most San Mateo County cities and San Mateo County Environmental Health (CEH) for CEH to conduct stormwater inspections of businesses on behalf of a city. However, CEH terminated the stormwater inspection agreements with the 17 cities on December 31, 2017. FY 2018/19 was the first full fiscal year for which each city was responsible for implementing all of the required activities under MRP Provision C.4, Commercial and Industrial Site Controls. Cities are continuing to develop the different aspects of their business inspection programs including inspector staffing (e.g., municipal, contractors, or other agency), data management, cost recovery, Business Inspection Plans (e.g., priorities and frequencies), Enforcement Response Plans, and outreach materials. The CII Subcommittee provides an important forum for communication among individual San Mateo County Permittees on their inspection programs, with overall support provided by the Countywide Program. In addition, a portion of the CII meeting time is dedicated to general information sharing. Municipal staff typically ask and answer questions, share problems and solutions, discuss issues and share important information and feedback among themselves. The CII Subcommittee may also request that the Countywide Program revises current inspection forms, data tracking tables, the Business Inspection Plan (BIP) template, and/or Enforcement Response Plan (ERP) template, based on the development of their individual programs.

The business inspector and illicit discharge contact lists that reside on the Countywide Program’s website will be periodically updated. A mobile business inventory and enforcement action table also reside on the CII section of the member’s only portion of the Countywide Program’s website. EOA assisted the CII Subcommittee in developing the regional inventory and the enforcement strategy to help meet MRP requirements for reducing pollutant discharges from mobile businesses. The mobile business inventory and enforcement action table will be periodically updated. As mobile businesses are added to the regional inventory they will be sent the SMCWPPP mobile cleaner business BMP brochure. EOA will develop inventory, enforcement strategy and BMPs for new categories of mobile businesses, as needed.

We anticipate that in FY 2019/20 the CII Subcommittee will continue to request additional assistance from the Countywide Program with developing improved stormwater BMP outreach materials for commercial and industrial businesses and conducting additional outreach to mobile businesses. This may include subcontracting for translating outreach materials into other languages and printing materials. Outreach to mobile businesses will continue to be coordinated with SMCWPPP’s PIP Subcommittee.

EOA will continue to facilitate quarterly CII Subcommittee meetings, including working with the chair to develop meeting agendas, prepare meeting materials (e.g., handouts and presentations), participate in the meetings, and prepare meeting summaries that include any action items agreed upon during the meeting. Between meetings, EOA will provide on-call assistance to municipal staff members by

responding to their emails and telephone calls, communicate pertinent information to the CII Subcommittee via email (e.g., training opportunities external to the Countywide Program), and maintain the CII Subcommittee contact list. EOA will also prepare the content for the section of the Countywide Annual Report that addresses MRP Provisions C.4, C.5, and C.13.b and c. In addition, EOA will periodically provide the webmaster with the information needed to update the business inspector and illicit discharge contact lists that reside on the countywide program's website and the mobile business enforcement action table and regional inventory on the CII section of the member's only portion of the website. EOA will also work with the CII Subcommittee to make revisions to current inspection forms, data tracking tables, the BIP template, and/or the ERP template, and to conduct additional outreach to mobile businesses, and/or develop/update BMPs for commercial, industrial or mobile businesses.

Deliverables:

- Facilitation of quarterly CII Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the CII Subcommittee of pertinent information, and updates to the CII Subcommittee contact list.
- Countywide Annual Report content for the section addressing MRP Provisions C.4, C.5, and C.13.b and c.
- Updates as appropriate to the business inspector and illicit discharge contact lists, mobile business enforcement action table, mobile business inventory, current inspection forms, data tracking tables, BIP template, and ERP template.
- Additional outreach to mobile businesses (in coordination with SMCWPPP's PIP Subcommittee), as appropriate. Develop inventory, enforcement strategy and BMPs for new categories of mobile businesses, as needed.
- Develop, update, translate, and/or print BMP outreach materials for commercial, industrial or mobile businesses.

Budget: \$37,428

SUBTASK SM12.04: TRASH SUBCOMMITTEE

EOA will continue to support the Countywide Program's Trash Subcommittee, which provides a forum for San Mateo County Permittee representatives to share information related to trash reduction in San Mateo County and discuss compliance activities required by the MRP. As part of meeting facilitation, EOA staff will update Subcommittee members on regional and countywide projects/tasks and solicit input and perspectives from members on key decision points. Subcommittee meetings will also serve as the key forum to discuss trash-related issues related to MRP compliance, in particular load reduction calculations and reporting requirements. Chris Sommers will continue to serve as EOA's lead for facilitation of the Trash Subcommittee and related work under this subtask, with support from experienced senior and associate level staff. For continuity, Chris will also continue to represent the Countywide Program on the BASMAA Trash Committee.

EOA will continue to facilitate quarterly Trash Subcommittee meetings, including preparing meeting agendas and other materials (e.g., handouts and presentations), participating in the meetings, and preparing meeting summaries that include any action items agreed upon during the meeting. Between

meetings, EOA will provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the Trash Subcommittee via email and maintain the Trash Subcommittee contact list. EOA will also prepare the content for the section of the Countywide Program's Annual Report that addresses MRP Provision C.10. In addition, EOA will continue to periodically provide the webmaster with the information needed to update the trash control related pages of the Countywide Program's website.

Deliverables:

- Facilitation of quarterly Trash Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the Trash Subcommittee of pertinent information, and updates to the Trash Subcommittee contact list.
- Countywide Program Annual Report content for the section addressing MRP Provision C.10.
- Updates as needed to the trash control related pages on the Countywide Program website.

Budget: \$20,176

SUBTASK SM12.05: WATERSHED ASSESSMENT AND MONITORING SUBCOMMITTEE

EOA will continue to support the Countywide Program's Watershed Assessment and Monitoring (WAM) Subcommittee, with a focus on compliance with MRP Provision C.8 (Water Quality Monitoring). WAM Subcommittee meetings are typically two hours in length. A large portion of the meeting time is dedicated to information sharing, the most important function for this subcommittee. The complex monitoring requirements of the MRP are described, recent monitoring results are presented (often within the context of historical results), and ideas and results for Stressor/Source Identification Projects are discussed. Interested staff from the various municipal agencies in San Mateo County can ask questions, share problems and solutions, discuss issues and provide important information and feedback among themselves. Bonnie de Berry will continue to serve as EOA's lead for supporting the WAM Subcommittee and related work under this subtask.

EOA will facilitate one annual WAM Subcommittee meeting during FY 2019/20, including working with the chair to develop the meeting agenda, prepare meeting materials (e.g., handouts and presentations), participate in the meeting, and prepare a meeting summary that includes any action items agreed upon during the meeting. The meeting will be held early during calendar year 2020 so that the most important outcomes to be reported in the Integrated Monitoring Report (IMR), which is due March 31, 2020, can be described. Outside of the meeting, EOA will provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the subcommittee via email, seek feedback as needed on certain activities such as selecting targeted monitoring sample station locations and implementing local and regional Stressor/Source Identification (SSID) studies, and maintain the subcommittee contact list. It should be noted that the section of the Countywide Annual Report that addresses MRP Provision C.8 simply refers to Provision C.8 deliverables that are scoped and budgeted separately (e.g., Integrated Monitoring Report and Pollutants of Concern Monitoring Report).

Deliverables:

- Facilitation of one annual WAM Subcommittee meeting, including meeting agenda, other meeting materials, and meeting summary.
- On-call communications with municipal staff, periodic communications to the WAM Subcommittee of pertinent information, feedback sought as needed on certain activities such as selecting targeted monitoring sample station locations and implementing SSID studies, and updates to the subcommittee contact list.

Budget: \$5,174

SUBTASK SM12.06: PARKS MAINTENANCE AND INTEGRATED PEST MANAGEMENT (IPM) WORKGROUP

EOA will support one meeting of the Countywide Program’s Parks Maintenance and IPM (PM&IPM) Workgroup, with a focus on compliance with MRP Provision C.9. This workgroup provides a forum for San Mateo County Permittees to share information related to implementing pesticide toxicity controls. Historically, the workgroup has mostly been attended by parks maintenance staff and focused on pest management issues in municipal parks, landscapes and right-of-ways. However, the overall focus of MRP Provision C.9 (Pesticides Toxicity Control) is broader and includes the following requirements:

- Maintain and Implement an IPM Policy or Ordinance and Standard Operating Procedures (C.9.a).
- Train Municipal Employees (C.9.b).
- Require Contractors to Implement IPM (C.9.c). It should be noted that MRP 2 includes additional focus on pesticides that are used for structural pest control, e.g., addressing pests such as rodents, ants, and cockroaches in municipal buildings.
- Interface with County Agricultural Commissioners (C.9.d)
- Public Outreach (C.9.e)
- Track and Participate in Relevant Regulatory Processes (C.9.f)
- Evaluate Implementation of Pesticide Source Control Actions (C.9.g)

EOA is continuing to broaden the focus of the meetings to provide guidance to municipal staff on meeting all of the requirements in C.9 and the associated reporting needs. We are continuing to encourage municipal staff with broader stormwater permit compliance responsibilities (including annual reporting) to attend these meetings. Vishakha Atre will continue to serve as EOA’s lead for facilitation of the PM&IPM Workgroup and related work under this subtask.

EOA will facilitate one PM&IPM Workgroup meeting during FY 2019/20, including working with the chair to develop the meeting agenda, prepare meeting materials (e.g., handouts and presentations), participate in the meeting, and prepare a meeting summary that include any action items agreed upon during the meeting. EOA will also continue to provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the PM&IPM Workgroup via email (e.g., training opportunities external to the Countywide Program), and maintain the PM&IPM Workgroup contact list. In addition, EOA staff will participate on behalf of San Mateo County Permittees in the BASMAA Municipal Operations committee. Finally, EOA will prepare the content for the section of the Countywide Annual Report that addresses MRP Provision C.9.

Deliverables:

- Facilitation of one PM&IPM Workgroup meeting, including meeting agenda, other meeting materials, and meeting summary.
- On-call communications with municipal staff, periodic communications to the PM&IPM Workgroup of pertinent information, and updates to the PM&IPM Workgroup contact list.
- Countywide Annual Report content for the section addressing MRP Provision C.9.

Budget: \$4,844

TASK SM03 – TRAINING

Training workshops cover a variety of municipal stormwater permit compliance topics. Objectives include assisting San Mateo County Permittees to meet specific MRP requirements, educating municipal staff on new requirements in the reissued permit, informing staff about Countywide Program policies, procedures or findings, and providing orientation or refresher trainings, especially in light of inevitable municipal staff turnover. EOA will work with the appropriate subcommittees to plan and implement a training program with a schedule that is tied to MRP compliance priorities. Typical training workshop tasks include: develop and complete a workshop registration list, draft and final workshop flyer and agenda, coordinate the workshop location and arrange for food catering services, arrange for outside speakers, prepare workshop materials (e.g., folders with various handouts including evaluation forms), facilitate and staff the workshop, prepare presentations and give them at the workshop, prepare a summary of the completed evaluation forms, prepare certificates of completion for participants fulfilling continuing education requirements, and submit workshop materials (e.g., presentations and evaluation summaries) for posting on the Countywide Program’s website. Based on EOA’s experience working with subcommittees to plan training workshops, it is essential to leverage efforts from individual San Mateo County Permittee representatives, and the workshop facilitation approach may be adapted based on San Mateo County Permittee staff availability.

In addition to the standard training workshop format of speakers giving power point presentations, EOA has incorporated videos, field trips, hands-on training, inspection scenarios for group exercises, plan review for group exercises, and product vendors into past trainings. Planning and development of training opportunities starts with understanding the target audience. For example, municipal maintenance staff often respond well to field exercises. Construction site inspectors and staff performing activities related to Integrated Pest Management (IPM) value trainings that provide continuing education hours required for certifications. Most workshops have focused on training municipal staff, but some have targeted other audiences, such as builders and development consultants.

Conventional trainings with PowerPoint presentations are a relatively low cost way to provide materials for staff that could not attend the trainings or staff that will use the materials to train others in their municipality. However, municipal staff also value trainings in the field without formal presentations. For example, a well-received approach that we utilized in the past was organizing field visits to several corporation yards in San Mateo County to discuss Corporation Yard BMPs required by MRP Provision C.2.f.

EOA utilizes evaluation forms at all of our workshops to identify opportunities to improve future workshops and focus them on topics that are identified as priority by municipal staff.

Each training will be supported by an EOA staff with specific expertise in its topic area, with overall coordination provided by Jon Konnan, EOA's project manager for C/CAG. The below sections provide a description of each training subtask, the lead EOA staff, deliverables, and budget.

SUBTASK SM13.01: BUSINESS INSPECTION AND ILLICIT DISCHARGE TRAINING PROGRAM

EOA will continue to work with the Commercial, Industrial and Illicit Discharge (CII) Subcommittee to plan and implement a business inspection and illicit discharge training program with a schedule that is tied to MRP compliance priorities. MRP Provision C.4.e requires focused training for industrial and commercial site inspectors and illicit discharge detection and elimination (IDDE) inspectors annually. At a minimum, the inspection training must cover the following topics within the 5-year permit term:

- Urban runoff pollution prevention;
- Inspection procedures;
- Business Inspection Plan (BIP);
- Enforcement Response Plan (ERP);
- IDDE; and
- Appropriate BMPs to be used a different industrial and commercial facilities.

Since each municipalities' BIP and ERP are specific to their jurisdiction it would be difficult to provide a Countywide Program training for these topics. EOA has provided guidance material to the CII Subcommittee on how to meet the annual training requirements as self-training, and document this for Annual Reporting. Other ideas on how to incorporate these topics into a Countywide Program training include providing the municipal specific BIPs and ERPs to workshop attendees for review during the lunch break, or incorporating these documents into a group exercise that requires attendees to review the documents and compare content to other municipalities.

MRP regulatory context generally plays a secondary role at trainings. The focus of the trainings will be on inspection procedures and BMPs. Municipal staff also request workshop topics related to the State Industrial Stormwater General Permit. SMCWPPP is a CWEA approved training organization, therefore municipal inspectors can receive continuing education hours needed to keep certifications current.

For the past several years SMCWPPP has assisted municipalities meet the annual MRP training requirement by conducting an annual CII training, alternating full day training workshops with smaller focused training activities. The last full day training workshop was held in FY 2017/18. During FY 2019/20, EOA will work with the CII Subcommittee to hold a full-day training workshop. This workshop will be the first workshop after the cities have had over a year to transition in how business inspections are implemented (e.g., from CEH staff conducting business inspections to the individual cities being responsible for all inspections). The workshop may not have the same level of support from municipal staff as past trainings because of the higher number of fairly new municipal stormwater inspectors.

Deliverables:

- Workshop location coordinated;
- Workshop registration;
- Draft and final workshop flyer and agenda;
- Workshop materials (e.g., folders with various handouts including evaluation forms);
- Food catering services;
- Staffing of the full-day workshop;
- Presentations by EOA staff and outside speakers;
- Certificates of completion for participants fulfilling continuing education requirements (if needed).
- Summary of the completed evaluation forms; and
- Workshop materials submitted for posting on the Countywide Program's website.

Budget: \$15,992

SUBTASK SM13.02: NEW/REDEVELOPMENT AND CONSTRUCTION SITE MANAGEMENT TRAINING PROGRAM

The reissued MRP expanded the focus of Provision C.3 by including GI planning requirements in Provision C.3.j and by linking it to implementation of GI in both private and public areas in Provisions C.10, C.11 and C.12 to reduce pollutant loadings to San Francisco Bay. EOA will work with the New Development Subcommittee (NDS) and Municipal Maintenance Subcommittee to design a training program that meets their needs and assists Permittees with MRP compliance. Additionally, as Permittees complete their individual municipal GI Plans in 2019, new training needs may be identified.

In conjunction with understanding MRP Provision C.6 (Construction Site Control), municipal staff need to be knowledgeable about State Construction General Permit (CGP) requirements for construction sites. In addition, Provision C.13.a requires that municipal staff be aware of architectural copper BMPs in development projects in order to educate installers and operators.

EOA will implement a training program on behalf of the Countywide Program that will include workshops for municipal planning, building, engineering and maintenance staff covering the development and retrofit of public and private projects, including topics such as:

- GI Plan implementation mechanisms (C.3.j);
- GI Plan integration with other municipal plans (C.3.j);
- Green Infrastructure Design Guide use and review with presentations from other C/CAG consultants (C.3);
- Typical GI Detail development and use and updates to the C.3 Regulated Projects Guide (C.3.j);
- Design review of LID systems (C.3);
- Inspection of LID systems during construction (C.3);

- Parks, landscaping and urban forestry opportunities for LID (C.3);
- New approaches and technologies for LID and GI (C.3);
- Inspection of LID systems at the completion of construction and on-going (C.3.h);
- Requirements for third-party inspections of vault-based systems (C.3.h);
- Inspection and enforcement of construction phase controls with site visits and vendor demonstrations (C.6 and the State CGP);
- Field Inspections and BMP demonstrations (C.6)
- Litter Management at existing and new development projects (C.10)
- Architectural copper issues (C.13.a);
- Example projects and case studies (All);

EOA will continue to facilitate an annual C.3 training workshop, a separate annual C.6 construction training workshop, and a presentation at one of the CALBIG (California Building Inspector Group) monthly meetings. As in past years, EOA will work with the NDS to develop the content for the C.3 and C.6 workshops. EOA's facilitation of each workshop will include the following components:

- Workshop location coordinated;
- Workshop registration;
- Draft and final workshop flyer and agenda;
- Workshop materials (e.g., folders with various handouts including evaluation forms);
- Food catering services;
- Staffing of the workshop;
- Presentations by EOA staff and outside speakers;
- Certificates of completion for participants fulfilling continuing education requirements (if needed);
- Summary of the completed evaluation forms; and
- Workshop materials submitted for posting on the Countywide Program's website.

Deliverables:

- Facilitation of the annual C.6 training, which will be about a half-day workshop.
- Facilitation of the annual C.3 training, which will be about a six hour workshop.
- Presentation at CALBIG meeting on construction site controls.

Budget: \$34,928

SUBTASK SM13.03: PESTICIDE TOXICITY REDUCTION TRAINING PROGRAM

EOA will continue to work with the Countywide Program's Parks Maintenance and IPM (PM&IPM) Workgroup to plan and implement a pesticide toxicity reduction training program with a schedule that is tied to MRP compliance priorities. The MRP Provision C.9.b requires municipal employees who, within the scope of their duties apply or use pesticides, to be trained in IPM practices and the Permittee's IPM policy, ordinance and/or standard operating procedures. Historically, the trainings have mostly been attended by parks maintenance staff, and have focused on pest management issues in municipal parks, landscapes and right-of-ways.

There has typically been excellent turn out by municipal Parks Maintenance staff at SMCWPPP's IPM workshops because they need continuing education credits to maintain their pesticide applicator license. SMCWPPP has been able to offer these continuing education credits at past trainings in coordination with San Mateo County Agricultural Weights and Measures representatives. This also contributes to meeting the MRP 2.0 Provision C.9.d requirement to maintain communications with county agricultural commissioners.

During FY 2019/20, EOA will work with the PM&IPM Workgroup to plan and conduct a half- day landscape IPM training workshop. The Landscape IPM workshop will include guest speakers from vendors, local pest control contractors implementing IPM, and/or the UC Cooperative Extension. Example topics will include pesticides and water quality, new IPM techniques for pest control, information on alternatives to pesticides of concern, respirator regulatory refresher, and online pesticide use reporting.

Deliverables:

- Workshop location coordinated;
- Workshop registration;
- Draft and final workshop flyer and agenda;
- Workshop materials (e.g., folders with various handouts including evaluation forms);
- Food catering services;
- Staffing of the half-day workshop;
- Presentations by EOA staff and outside speakers;
- Certificates of completion for participants fulfilling continuing education requirements (if needed).
- Summary of the completed evaluation forms; and
- Workshop materials submitted for posting on the Countywide Program's website.

Budget: \$10,320

TASK SM04 – TRASH LOAD REDUCTION

The development and implementation of stormwater trash control programs is a high priority component in the reissued MRP. These programs are designed to significantly reduce trash and litter discharged from municipal stormwater systems and protect local creeks and San Francisco Bay. The MRP stipulates challenging trash reduction goals over an aggressive timeframe (i.e., 60%, 70% and 80% by 2016, 2017 and 2019, respectively) in anticipation of achieving a 100% reduction goal by 2022. San Mateo County municipalities are striving to achieve trash load reduction goals through the cost-effective implementation of control measures. To achieve this objective, EOA will continue assisting SMCWPPP, primarily with ongoing tasks conducted in previous years, under the oversight of the Trash Subcommittee. The Trash Subcommittee is a forum to share information on trash controls among San Mateo County Permittees, present approaches to compliance with trash reduction goals, and coordinate the implementation of MRP required studies and projects (see Subtask SM12.04). These tasks will include:

- Providing assistance on updating and implementing long-term Trash Reduction Plans, including trash generation maps;
- Identifying optimal locations for trash full capture devices;
- Conducting effectiveness assessments for existing source control actions (i.e., single use plastic bag bans and polystyrene food ware bans);
- Supporting the Litter Work Group, which focuses on reducing the stormwater impacts of illegal dumping and inadequate waste management practices in the County;
- Developing and implementing trash assessment strategies, including the mapping of full capture treatment areas and conducting on-land visual trash assessments for San Mateo County Permittees;
- Annual reporting and data collection guidance and assistance for reporting trash reductions associated with creek and shoreline cleanups;
- Calculating and reporting trash load reductions to the Regional Water Board in compliance with the MRP;
- Revising the on-land visual assessment program to incorporate trash generating properties >10,000 ft² that drain to private inlets and intersect with San Mateo County Permittee stormwater conveyance systems; and
- Managing and implementing the pilot trash receiving water monitoring programs, including the preparation and collection of trash data from a set of creek sites, coordinating with San Mateo County Permittees trash monitoring efforts, and managing data collected by EOA and San Mateo County Permittees.

Chris Sommers will continue as the task leader for the trash load reduction task, supported by senior and associate level staff at EOA (e.g., Peter Schultze-Allen, John Fusco and Nick Zigler). Subtask descriptions, deliverables and budgets are provided below.

SUBTASK SM14.01: LONG-TERM TRASH LOAD REDUCTION PLAN SUPPORT

During this permit term, EOA has provided guidance on long-term trash planning, including trash mapping and data management services, and revisions to trash generation, full capture system, and hot spot GIS data layers. During FY 2019/20 EOA will continue to:

- **Provide Guidance on Trash Management Strategies** - Provide on-call guidance on long-term plan implementation and perspectives on optimization of control actions for trash management, via conference calls and meetings with San Mateo County Permittees.
- **Maintain GIS Data Layers and Mapping** - Provide guidance on revisions to baseline trash generation map data layers and revise trash generation rates and jurisdictional areas based on direction from San Mateo County Permittees. Revisions to baseline maps needed as a result of reassessment of trash generation on private parcels and the installation of additional trash full capture systems will also be conducted via this subtask.

Deliverables:

- On-call guidance and participation in meetings/calls to discuss long-term plan implementation, provide perspectives on control actions for trash management, and discuss assessment results and other pertinent topics.
- Updated/revised trash generation and full capture system maps and GIS data layers in preparation for FY 2019/20 Annual Report submittals.

Budget: \$45,206

SUBTASK SM14.02: LITTER WORKGROUP

In 2013 the EOA project team assisted SMCWPPP with the development of the Litter Work Group, which is intended to provide a forum for sharing trash management information among San Mateo County Permittees, solid waste haulers, county recycling and waste management program staff, and other stakeholders. During this permit term EOA has continued to coordinate and facilitate Litter Work Group meetings, develop annual work plans, conduct annual roundtable workshops, and implement high priority tasks recommended by the Litter Work Group and/or the SMCWPPP Trash Subcommittee. Consistent with the FY 2019/20 Litter Work Group Work Plan, during FY 2019/20 EOA will:

- **Litter Work Group Coordination** - Facilitate two Litter Work Group meetings/calls. As part of this coordinator role, EOA will develop and distribute meeting agendas, prepare meeting materials as needed, participate in meetings, and prepare and distribute meeting summaries.
- **Coordination with Transportation Agencies** – Facilitate two coordination meetings with transportation agencies (e.g., Caltrans and Caltrain) on trash/litter issues and conduct follow up communications with agency staff (as needed) between and after the two meetings. As part of this coordinator role, EOA will develop and distribute meeting agendas, prepare meeting materials as needed, participate in meetings, and prepare and distribute meeting summaries.

- **Annual Roundtable Workshop** – The Litter Work Group will hold an event for San Mateo County Permittees and transportation agencies. The roundtable event will be conducted to present and discuss opportunities and barriers for enhanced coordination on trash control measure implementation. The roundtable will include discussions on important trash sources, specific trash control measure types, potential mutually beneficial projects, cost-sharing mechanisms, and on-going collaboration. The anticipated outcome of the roundtable is a list of potential collaborative projects in San Mateo County Permittee areas that can be further scoped and discussed in subsequent dialogues with individual Permittees and/or SMCWPPP staff.
- **Stormwater Trash Characterization Study** – the Litter Work Group will develop a sampling and analysis plan (SAP) for conducting a trash characterization study, which will be focused on evaluating the effectiveness of existing trash source control actions and filling information gaps on the dominant types of trash in stormwater in San Mateo County to inform future source control measures in San Mateo County.
- **Annual Work Plan Development** - Work with the Litter Work Group to identify high priority tasks that should be conducted by SMCWPPP in FY 2020/21, to the extent that budget is available to fund these tasks. A draft Work Plan will be distributed to the Trash Subcommittee for review.
- **Coordinate with Other Efforts** – The Litter Work Group will continue to coordinate litter reduction efforts with the Countywide Recycling Committee, the SMCWPPP PIP Subcommittee and the Zero Litter Initiative in the Santa Clara Valley.

Deliverables:

- Facilitation of two Litter Work Group meetings, including preparation of meeting agendas, supporting materials, and meeting summaries.
- Facilitation of two coordination meetings with transportation agencies, including preparation of meeting agendas, supporting materials, and meeting summaries.
- Planning and facilitation of a roundtable workshop with transportation agencies to reduce litter.
- Development of a sampling and analysis plan (SAP) for conducting a trash characterization study.
- Draft and final FY 2020/21 Work Plan for the Litter Work Group.

Budget: \$26,190

SUBTASK SM14.03: TRASH LOAD REDUCTION ASSESSMENT PROGRAM

The EOA project team will assist San Mateo County Permittees by refining, implementing and managing the SMCWPPP Trash Load Reduction Assessment Program that was initially developed by EOA in FY 2013/14. The Program is consistent with MRP requirements and includes the use of the *On-land Visual Trash Assessment Protocols* developed by EOA and designed to assess the levels of trash that are generated onto streets, sidewalks and other land areas that may enter the stormwater conveyance system. The on-land assessment methods provide information that Permittees can use to demonstrate progress towards trash load reduction goals included in the MRP. SMCWPPP incorporated the protocols

into its 2014 *Pilot Trash Load Reduction Assessment Strategy* submitted to the Regional Water Board with the San Mateo County Permittee Long-term Trash Load Reduction Plans.

During FY 2019/20, EOA will continue to implement and manage the SMCWPPP Trash Load Reduction Assessment Program, which entails annually selecting OVTA sites, conducting trash assessments at a frequency of three times per year at each site, implementing appropriate quality assurance and control procedures, and managing assessment data via the SMCWPPP on-land visual assessment database developed by EOA. Three assessments will be conducted at each of roughly 300 sites, including new OVTA sites established via reassessments of baseline trash generation on parcels that were recently conducted by San Mateo County Permittees. OVTAs will be conducted during the dry and wet season (to the extent possible). Assessment sites will be located in high priority trash management areas identified by San Mateo County municipalities. To the extent feasible, EOA will use trained interns or technicians to conduct these assessments to reduce costs. Additionally, EOA will coordinate with San Mateo County Permittees on all assessments and incorporate any assessment data collected by San Mateo County Permittees into the SMCWPPP database system.

Deliverables:

- Selection of sites and completion of roughly 900 on-land visual assessments.
- Assessment results entered into the SMCWPPP on-land visual assessment database.
- Ongoing technical support on assessments and associated data.

Budget: \$131,476

SUBTASK SM14.04: TRASH HOT SPOT CLEANUP TRACKING AND REPORTING

The MRP requires Permittees to annually remove trash to a level of “no visual impact” from a minimal number of trash hot spots in creeks and shorelines within their jurisdictions. Additionally, Permittees are required to record the volumes of trash removed from these hot spots. During the previous permit term and the first 3.5 years of the current permit term, the EOA project team assisted Permittees in selecting and reporting hot spot locations to the Regional Water Board, provided guidance on collecting and reporting trash cleanup data, and managed these data (i.e., trash volumes, types and sources) on behalf of all San Mateo County Permittees via the SMCWPPP trash hot spot cleanup database.

During FY 2019/20, EOA will continue to provide guidance to San Mateo County Permittees on hot spot selection, manage the data collected by San Mateo County Permittees during hot spot cleanups, and develop standardized reporting formats populated with historical and current hot spot data for each San Mateo County Permittee to satisfy annual reporting requirements. EOA will continue to provide guidance and tools to San Mateo County Permittees, including data collection and load removal calculation tools associated with creek and shoreline cleanup activities. The guidance and tools are intended to maintain the quality and consistency of data collected via cleanup activities by San Mateo County Permittees and allow evaluation of trends over time. EOA will also input all San Mateo County Permittee data into the existing SMCWPPP trash hot spot cleanup database and manage those data on behalf of all San Mateo County Permittees. EOA will use output from the database to populate the trash hot spot cleanup sections of San Mateo County Permittees’ trash load reduction annual report forms.

Deliverables:

- Annual reporting and data collection guidance for reporting trash reductions associated with creek and shoreline cleanups.
- Creek and shoreline trash hot spot cleanup data collected by San Mateo County Permittees added to database.
- Annual Report tables populated with hot spot cleanup data for current and previous fiscal years.

Budget: \$ 16,212

SUBTASK SM14.05: ASSIST WITH ANNUAL REPORTING AND LOAD REDUCTION CALCULATIONS

The MRP requires that Permittees report annually on progress towards trash load reduction goals (i.e., 60%, 70% and 80% by 2016, 2017 and 2019, respectively). Local agencies that fail to demonstrate achievement and maintenance of the 80% goal may be subject to enforcement by the Regional Water Board or lawsuits by third parties. During the previous permit term and the first 3.5 years of this term, EOA assisted all San Mateo County Permittees in demonstrating trash load reductions, resulting in determinations of compliance for nearly all San Mateo County municipalities. The accounting system used last permit term was revised during reissuance of the MRP, necessitating ongoing guidance and assistance on load reduction accounting during the current permit term.

During FY 2019/20, EOA will continue to provide technical support to all San Mateo County Permittees on annual reporting. EOA will assist with developing each San Mateo County Permittee's trash load reduction section of its Annual Report by providing guidance for completing Annual Report forms and developing load reduction calculations for full capture systems, institutional controls (via on-land assessment results), source control actions, and creek and shoreline cleanup offsets. For those municipalities that provide draft Annual Report sections by a certain date (to be determined), EOA will review the forms and provide comments, to the extent feasible within available budget.

Deliverables:

- Updated guidance to San Mateo County Permittees for completing the trash load reduction section of their Annual Reports.
- Draft and final calculations of trash load reductions for each San Mateo County Permittee for each fiscal year, and associated draft annual report sections.
- Comments on trash control sections of individual municipal Annual Reports as applicable and feasible within available budget.

Budget: \$35,038

SUBTASK SM14.06: PILOT TRASH MONITORING PROGRAM FOR RECEIVING WATERS

MRP Provision C.10.b.v requires that San Mateo County Permittees submit a plan to the Regional Water Board by July 1, 2017 to implement a pilot receiving water monitoring program for trash. This plan was developed through a BASMAA regional project and was approved by the Regional Water Board's

Executive Officer (EO). The reporting of the receiving water monitoring data is also being handled at the regional level via BASMAA and is not part of this task.

During FY 2019/20, EOA will continue to manage and implement the pilot receiving water monitoring program for trash in San Mateo County on behalf of San Mateo County Permittees. The tasks described below are consistent with the regional plan approved by the Regional Water Board's EO. EOA will conduct qualitative trash assessments, in coordination with San Mateo County Permittee trash monitoring/assessment conducted at trash hot spots (or equivalent). Specific tasks that EOA will conduct in FY 2019/20 include the following:

- Prepare for and conduct qualitative trash receiving water assessments two times at each of 30 creek monitoring sites, which will be located at creek status monitoring sites assessed in FY 2017/18 and 2018/19 by EOA;
- Assist with quantitative monitoring to be conducted at trash booms identified in the regional plan (i.e., in the City of San Mateo);
- Coordinate with San Mateo County Permittees on all quantitative trash monitoring conducted by San Mateo County Permittees at sites previously identified;
- Manage all trash assessment/monitoring data collected by EOA and San Mateo County Permittees in a database that will be submitted to the Regional Water Board in FY 2019/20 in data formats developed via a BASMAA Regional Project; and
- Coordinate on final reporting to the Regional Water Board in July 2020 via a BASMAA Regional Project.

Deliverables:

- Completed field forms and photographs for all creek trash assessment events conducted in FY 2019/20 (up to 60 total assessments).
- Database populated with data collected during all creek trash assessment and monitoring events conducted by EOA and San Mateo County Permittees in FY 2019/20.

Budget: \$51,684

TASK SM05 – MERCURY AND PCBs LOAD REDUCTION

The reissued MRP includes enforceable numeric load reduction performance criteria. Thus the development and implementation of control programs for mercury and PCBs has become an increasingly high priority component for Permittees. Jon Konnan will continue to serve as the task leader for Mercury and PCBs Load Reduction. Subtask descriptions, deliverables and budgets are provided below.

SUBTASK SM15.01: IDENTIFY MANAGEMENT AREAS AND CONTROL MEASURES

The reissued MRP requires Permittees to demonstrate implementation of mercury and PCBs control measures in areas where benefits are most likely to accrue (i.e., "focused implementation"). In what may be one of the more challenging requirements in the reissued permit, Provision C.12.a requires Bay-

area wide PCBs load reductions of 500 gram/year by June 30, 2018 and 3 kg/year by June 30, 2020.² The portions of these reductions required of San Mateo County Permittees, which are based on relative population, are 60 gram/year by June 30, 2018 and 370 gram/year by June 30, 2020. The focus of this subtask will be for EOA to assist San Mateo County Permittees to take credit for existing and planned PCBs control measures and, to the extent needed, plan and implement new control measures to achieve these load reductions. This will necessitate continuing the process of identifying which pollutant source areas in San Mateo County provide the greatest opportunities for cost-effectively implementing controls to reduce discharges of mercury and PCBs.³

Taking credit for PCBs loads reductions associated with existing and planned activities such as redevelopment (and associated site abatement and C.3 treatment), contaminated site cleanups, and any enhanced stormwater conveyance cleanouts (e.g., channel dredging) in old urban (and especially old industrial) land uses remains an important part of the strategy to meet these requirements in the most cost-effective manner. EOA will work closely with municipal staff to identify the types and locations of existing and new control measures that will be implemented and associated implementation schedules.

Work that will be conducted under the Countywide Program's water quality monitoring component to identify pollutant source areas (i.e., Pollutant of Concern Monitoring) is closely related to this subtask. EOA will therefore integrate this subtask with implementation of Provision C.8.f. (see Subtask SM17.05). Implementation of this subtask will also be informed by the Countywide Program's ongoing coordination of efforts to address mercury and PCBs with other Bay Area countywide stormwater programs through the BASMAA Monitoring and Pollutants of Concern Committee (MPC).

During FY 2019/20, EOA will continue to assist San Mateo County Permittees to make further progress towards:

- Referring PCBs source properties to the Regional Water Board, as needed, including assistance with completing the standard referral form and supporting documentation.
- Identifying the watersheds or portions of watersheds (management areas) in which PCBs control measures are currently being implemented and those in which new control measures will be implemented during the term of this permit.
- Identifying the control measures that are currently being implemented and those that will be implemented in each watershed and management area, including the number, type, and locations and/or frequency (if applicable) of control measures and a description of the contaminated sites referred to the Regional Water Board.
- Developing clear statements of the roles and responsibilities of each participating Permittee for implementation of the control measures.

² It is important to note that the latter requirement is distinct from the Provision C.12.c requirement for a 3 kg/year Bay-area wide PCBs load reduction via GI by the year 2040.

³ During the current permit term, the general assumption will continue to apply that controls measures should be selected to reduce PCBs loads and the ancillary benefits of those measures in reducing mercury loads will be sufficient for addressing mercury.

- Submitting a schedule of control measure implementation, including interim implementation progress milestones (e.g., construction milestones for structural controls or other relevant implementation milestones for structural controls and non-structural BMPs) and a schedule for milestone achievement.
- Planning and implementing reasonable control measures towards achieving San Mateo County's load reduction performance criteria this permit term.
- Working with C/CAG and Permittees to develop strategies for attempting to meet the June 30, 2018 and June 30, 2020 load reduction requirements.
- Demonstrating PCBs and mercury load reductions using the interim accounting methodology that BASMAA recently developed. Permittees are required to annually report load reductions calculated for all applicable controls and progress towards meeting June 30, 2018 and June 30, 2020 load reduction requirements.

This subtask will also include participating in regional POCs Steering Committee meetings, which provide a forum for information sharing and communication among staff from the Bay Area countywide stormwater programs, MRP Permittees, and Regional Water Board staff.

Deliverables

- Assisting Permittees with referring PCBs source properties to the Regional Water Board, as needed, including assistance with completing the standard referral form and supporting documentation.
- Report (submitted with the FY 2019/20 Countywide Program Annual Report) documenting progress towards identifying priority PCBs control watersheds and management areas, specific control measures, PCBs and mercury load reductions achieved this permit term through FY 2019/20, an implementation schedule, and working with C/CAG and Permittees to develop strategies for attempting to meet the June 30, 2018 and June 30, 2020 load reduction requirements.
- Participating in regional POCs Steering Committee meetings.
- Working with C/CAG staff as needed on all aspects of Provisions C.11/12 compliance.

Budget: \$30,092

SUBTASK SM15.02: ASSIST WITH PROGRAM TO MANAGE PCBs DURING DEMO - DATA COLLECTION/EVALUATION

MRP Provision C.12.f. (managing PCBs during building demolition) requires development of a data collection and assessment methodology program by July 1, 2019 to quantify PCBs loads reduced through implementation of the new program for controlling PCBs during building demolition, which begins implementation on that date. Provision C.12.f.iii requires Permittees to submit the data collection and assessment methodology with their FY 2019/20 Annual Reports,⁴ and states that this reporting should be at the regional level on behalf of all Permittees.

⁴ There are no C.12.f reporting requirements with the FY 2018/19 Annual Reports.

C/CAG will need to work with other Bay Area stormwater management programs through the BASMAA MPC to develop a data management system, and refine, document and report on the data collection and assessment methodology currently under development. C/CAG will also need to assist San Mateo County Permittees with other closely related Provision C.12.f.iii reporting requirements (e.g., Permittees must submit with their FY 2019/20 Annual Reports a running list of applicable structures that applied for a demolition permit and those that had materials with PCBs at 50 ppm or greater).

As feasible within this subtask's budget, EOA will assist C/CAG staff with providing administrative and technical support to San Mateo County Permittees for their ongoing efforts to comply with the data collection/evaluation and reporting requirements under C.12.f.

Deliverables

- Assistance to C/CAG staff with providing administrative and technical support to San Mateo County Permittees for their ongoing efforts by to comply with data collection/evaluation and reporting requirements under MRP Provision C.12.f.

Budget: \$8,664

SUBTASK SM15.03: PCBs AND MERCURY TMDL CONTROL MEASURES PLAN

MRP Provision C.11/12.d. requires that Permittees prepare a plan and schedule for PCBs control measure implementation and reasonable assurance analysis demonstrating that sufficient control measures will be implemented to attain the Hg/PCBs TMDL wasteload allocations by 2028/2030. The plan must:

1. Identify all technically and economically feasible Hg/PCBs control measures to be implemented (including green infrastructure projects); and
2. Include a schedule according to which these technically and economically feasible control measures will be fully implemented; and
3. Provide an evaluation and quantification of the Hg/PCBs load reduction of such measures as well as an evaluation of costs, control measure efficiency and significant environmental impacts resulting from their implementation.

Permittees are required to submit the plan and schedule with the FY 2019/20 Annual Report. EOA will work with Paradigm Consultants to prepare the plan by conducting the following general steps:

- Project estimated load reductions (e.g., by 2028/2030) from various source controls (in coordination with the BASMAA regional project to update accounting methods), including the following:
 - Referrals
 - Small trash controls (e.g., inlet filters)
 - Large trash controls (e.g., East Palo Alto)
 - O&M (e.g., channel dredging)
 - Management of PCBs during demolition of buildings

- Per the RAA guidance, scale source control load reduction credits (only for interim accounting methods that use land use-based PCBs and mercury yields) to be consistent with the new loading baseline calculated for the RAA. This is needed because the inputs to the load reduction calculations included in the interim accounting methodology are based on the reported baseline loads in the TMDLs. This reconciliation will allow for the source control load reduction credits to be added to the modeled green infrastructure load reductions (and expressed as volume managed by the RAA).
- Project how much private GI is expected by 2028/2030 (via redevelopment) and associated load reductions.
- Estimate how much public GI and regional treatment is already planned by 2028/2030 and associated load reductions. Regional projects to consider include Cartan Field in Atherton, Orange Memorial Park in South San Francisco, Caltrans I-280, Red Morton Park in Redwood City, and Twin Pines Park in Belmont.
- If full allocation is not projected to be met via source controls and planned GI/treatment (a likely outcome), propose closing the gap with additional GI/treatment (could also potentially evaluate feasibility of other highly uncertain methods such as periodic dredging of a pond in Redwood City).
- Adapt existing modeling results to determine the extent and cost of additional GI/treatment needed to fill the anticipated gap.
- Work with C/CAG staff, San Mateo County Permittees, and other Bay Area stormwater programs to define “economically feasible”.
- Develop implementation schedule(s) for all feasible controls.
- Integrated this planning with ongoing efforts by C/CAG to assist San Mateo County municipalities obtain grant funding for planning and building green infrastructure. In addition, possibly incorporate into a GI investment plan that will potentially be developed the new San Mateo County water agency, potentially based upon more realistic time frame resulting from extension of the PCBs TMDL.

Deliverables

- A plan and schedule for PCBs control measure implementation and reasonable assurance analysis demonstrating that sufficient control measures will be implemented to attain the Hg/PCBs TMDL wasteload allocations by 2028/2030.

Budget: \$58,656

SUBTASK SM15.04: RISK REDUCTION COORDINATION AND REPORTING

MRP Provision C.12.h, Implement a Risk Reduction Program, requires Permittees to conduct or cause to be conducted an ongoing risk reduction program with the potential to reach 3,000 individuals annually (Bay Area-wide total for all MRP Permittees) who are likely consumers of San Francisco Bay-caught fish. Permittees are required to report on the status of the risk reduction program in each of their Annual Reports, 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. In addition, near the end of the permit term Permittees are required to evaluate the effectiveness of the risk reduction program.

EOA will assist C/CAG and San Mateo County Permittees to coordinate and report on efforts to comply with Provision C.12.h. EOA will work with the Program Manager to coordinate related efforts by San Mateo County Environmental Health (CEH) and any related efforts by others in light of the permit requirements. EOA will also compile available related data from CEH and others and use these data to prepare a section of the Countywide Program's Annual Report that addresses the C.12.h reporting requirement. In addition, EOA will work with CEH staff to conduct an evaluation of the effectiveness of the risk reduction program.

Deliverables

- Coordination with CEH and any other related efforts.
- Section of the FY 2019/20 Countywide Program Annual Report that addresses the C.12.h reporting requirement, including results of an evaluation of the effectiveness of the risk reduction program.

Budget: \$10,616

TASK SM06 – ANNUAL REPORTING

EOA will continue to assist the Countywide Program with annual compliance reporting. This includes preparation of the Countywide Program annual report and, for individual municipal annual reports, developing guidance and templates, conducting preparation workshops, reviewing agency draft reports, and compiling and submitting reports to the Regional Water Board in compliance with the MRP.

San Mateo County Permittees are required to annually report on progress towards trash load reduction goals. EOA's technical support to San Mateo County Permittees on this aspect of annual reporting is scoped and budgeted for separately under the Trash Load Reduction task. In addition, review of the trash control sections of San Mateo County Permittee annual reports is covered under Subtask SM04.05 (Assist with Annual Reporting and Load Reduction Calculations).

Jon Konnan will continue to serve as the task leader for Annual Reporting as part of his overall role as EOA's project manager for providing municipal stormwater permit compliance support to C/CAG. Subtask descriptions, deliverables and budgets are provided below.

SUBTASK SM16.01: COUNTYWIDE PROGRAM ANNUAL REPORT

EOA will prepare the Countywide Program's Annual Report, which documents all activities performed by the Countywide Program during the year on behalf of San Mateo County Permittees. EOA will develop a draft report annually by mid-August for C/CAG and San Mateo County Permittee staff review and comment and final report for submittal by the annual September 30 due date in the MRP. The budget for this task assumes that all of the content for the Annual Report will be prepared under Task SM12 (Subcommittee Support) or by C/CAG's other consultants (e.g., public outreach content to be prepared by SGA, content related to GI planning to be prepared by CD+A, and content related to Reasonable Assurance Analysis to be prepared by Paradigm). This subtask will consist of obtaining, compiling and

formatting that information, preparing standard report features such as a table of contents and executive summary, and facilitating the review process.

Deliverables

- Draft of the Countywide Program’s FY 2018/19 Annual Report by mid-August and final report for submittal by September 30.

Budget: \$16,536

SUBTASK SM16.02: ANNUAL REPORT GUIDANCE

EOA will develop an Annual Report guidance package for San Mateo County Permittees’ use in preparing their own annual reports. The package will include a version of the BASMAA Annual Report form customized and annotated with guidance for San Mateo County municipalities, a model certification statement and cover letter, and a memorandum that explains all of the facets of the annual reporting process and summarizes essential dates and milestones. This task does not include developing the public outreach parts of the customized Annual Report form since it is assumed SGA will conduct that work.

EOA and SGA will develop an Annual Report guidance package including a customized and annotated Annual Report form, a model certification statement and cover letter, and a memorandum that explains all of the facets of the annual reporting process and summarizes essential dates and milestones.

Deliverables

- FY 2019/20 Annual Report guidance package for electronic submittal to San Mateo County Permittees and posting on Countywide Program website, annually by mid-July.

Budget: \$7,452

SUBTASK SM06.03: REVIEW DRAFT PERMITTEE ANNUAL REPORTS

EOA will review and comment on draft San Mateo County Permittee Annual Reports prior to submittal of final reports to the Regional Water Board. San Mateo County Permittees will be required to submit a draft of their Annual Report to EOA by a certain date (TBD) in order to be guaranteed of the review, but EOA will make every effort to review and comment on draft reports that are submitted late. We assume that the planned review period will be approximately the first two weeks of September.

This task does not include review of the public outreach section of each San Mateo County Permittee’s annual report since it is assumed that SGA will review that section.

Deliverables

- Review and comment on Permittee draft FY 2019/20 Annual Reports during the first two weeks of September. Review of the public outreach sections not included.

Budget: \$11,736

SUBTASK SM06.05: SUBMIT PERMITTEE ANNUAL REPORTS

EOA will electronically obtain available FY 2019/20 Annual Reports from San Mateo County Permittees and upload to the Regional Water Board's FTP site. EOA will also print a hard copy of each Annual Report and deliver to the Regional Water Board's offices in Oakland.

Deliverables

- Available FY 2019/20 Annual Reports submitted electronically to Regional Water Board by September 30. Hard copies submitted by October 15.

Budget: \$2,676

EXHIBIT A

EOA FY 2019/20 Municipal Stormwater Permit Compliance Assistance to SMCWPPP

		Principle	Manager III	Manager II	Manager I	Senior III	Senior II	Senior I	Associate II	Associate I	Technician	Clerical	Expenses/Subs	Budget
EOA Hourly Rate for SMCWPPP:		\$230	\$216	\$214	\$211	\$194	\$172	\$154	\$144	\$117	\$94	\$70		
General Support to Program Manager														
SM11.01	General Support	0	192	0	0	0	0	0	0	0	0	0	\$800	\$42,272
SM11.02	Stormwater Committee Support	0	60	0	0	0	0	0	0	0	0	0	\$300	\$13,260
SM11.03	BASMAA Activities Support	0	48	0	0	0	0	0	0	0	0	0	\$200	\$10,568
SM11.04	BASMAA Regional Projects Planning Support	0	48	0	0	0	0	0	0	0	0	0	\$200	\$10,568
SM11.05	Coordination and Integration	2	80	0	0	0	0	0	12	0	0	2	\$400	\$20,008
SM11.06	Permit Re-issuance Support	32	96	0	32	0	0	0	0	0	0	0	\$700	\$35,548
		2	428	0	0	0	0	0	12	0	0	2	\$1,900	\$132,224
Subcommittee Support														
SM12.01	Municipal Maintenance Subcommittee	0	0	50	0	0	0	0	0	0	0	8	\$200	\$11,460
SM12.02	New Development & Construction Subcommittee (NDS)	0	72	0	0	298	0	0	38	0	0	32	\$3,650	\$84,726
SM12.03	Commercial/Industrial/Illlicit (CII) Discharges Subcommittee	0	0	132	0	0	0	0	40	0	0	6	\$3,000	\$37,428
SM12.04	Trash Subcommittee	32	0	0	0	64	0	0	0	0	0	0	\$400	\$20,176
SM12.05	Watershed Assessment and Monitoring (WAM) Subcommittee	0	2	0	22	0	0	0	0	0	0	0	\$100	\$5,174
SM12.06	Parks Maintenance and IPM (PM&IPM) Workgroup	0	4	0	0	20	0	0	0	0	0	0	\$100	\$4,844
		32	78	182	22	382	0	0	78	0	0	46	\$7,450	\$163,808
Training														
SM13.01	CII Training Workshop	0	0	44	0	0	0	0	24	0	0	16	\$2,000	\$15,992
SM13.02	New/Redevelopment and Construction Trainings	0	30	24	0	88	0	0	0	0	0	32	\$4,000	\$34,928
SM13.03	Pesticide Toxicity Reduction Training Program (Landscape IPM Workshop)	0	4	0	0	24	0	0	16	8	0	8	\$1,000	\$10,320
		0	34	68	0	112	0	0	40	8	0	56	\$7,000	\$61,240
Trash Load Reduction														
SM14.01	Long-Term Trash Load Reduction Plan Support	60	0	0	0	75	0	40	24	40	0	8	\$2,000	\$45,206
SM14.02	Litter Workgroup	30	0	0	0	60	0	0	20	30	0	8	\$700	\$26,190
SM14.03	Trash Load Reduction Assessment Program	32	0	0	0	24	0	0	250	360	360	0	\$7,500	\$131,476
SM14.04	Trash Hot Spot Cleanup Tracking and Reporting	4	0	0	0	32	0	0	48	16	0	0	\$300	\$16,212
SM14.05	Assist with Annual Reporting and Load Reduction Calculations	24	0	0	0	32	0	0	80	50	60	0	\$300	\$35,038
SM14.06	Pilot Trash Monitoring Program for Receiving Waters	30	0	0	0	60	0	0	60	112	100	0	\$2,000	\$51,684
		0	180	0	0	283	0	40	482	608	520	16	\$12,800	\$305,806
Mercury and PCBs Load Reduction														
SM15.01	Identify Management Areas and Control Measures	0	32	0	0	40	0	40	40	20	0	8	\$600	\$30,092
SM15.02	Assist with Programs to Manage PCBs during Demolition - Data Collection/Evaluation	0	32	0	0	8	0	0	0	0	0	0	\$200	\$8,664
SM15.03	PCBs and Mercury TMDL Control Measures Plan	0	60	0	0	120	0	64	40	40	0	16	\$1,000	\$58,656
SM15.04	Risk Reduction Coordination and Reporting	0	16	0	0	24	0	0	16	0	0	0	\$200	\$10,616
		0	140	0	0	192	0	104	96	60	0	24	\$2,000	\$108,028
Annual Reporting														
SM16.01	Countywide Program Annual Report	0	32	0	0	16	0	0	40	0	0	8	\$200	\$16,536
SM16.02	Annual Report Guidance	0	10	8	0	12	0	0	8	0	0	0	\$100	\$7,452
SM16.03	Review Draft Permittee Annual Reports	0	16	16	0	24	0	0	0	0	0	0	\$200	\$11,736
SM16.04	Submit Permittee Annual Reports	0	4	0	0	0	0	0	8	0	0	8	\$100	\$2,676
		0	62	24	0	52	0	0	56	0	0	16	\$600	\$38,400

Total Budget:	\$31,750	\$809,506
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Notes:

Labor hours are based upon the approximate level of effort for each task.

Subcontractors and expenses are planning-level estimates.

Actual distribution of hours and subcontractors/expenses within and among tasks may vary.

Total budget will not be exceeded and any contingency item budgets will not be utilized without C/CAG's authorization.

Expenses/subcontractors budgets shown include 10% overhead.