

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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TASK ORDER FORM

Date/Start Date: July 1, 2020
Consultant Name: EOA, Inc.
Contract: Countywide Water Pollution Prevention Program Technical Support – On-Call Contracts
Task Order No.: EOA-11
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 2020-21 scope of work, not to exceed \$764,984.
Completion Date: September 30, 2021

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 2020/21
Municipal Stormwater NPDES Permit
Compliance Assistance

General Services
Scope of Work and Budget

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



Prepared by EOA, Inc.



FINAL May 15, 2020

INTRODUCTION

EOA, Inc. (EOA) prepared this scope-of-work and budget to provide general permit compliance services to 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 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 general services tasks, budgets, and deliverables for FY 2020/21 (i.e., July 2020 – June 2021).¹

Table 1 and Exhibit A summarize the general services 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	\$161,508
SM12	Subcommittee Support	\$171,792
SM13	Training	\$55,174
SM14	Trash Load Reduction	\$291,480
SM15	Mercury and PCBs Load Reduction	\$44,708
SM16	Annual Reporting	\$40,322
Total Budget:		\$764,984

Note: See Exhibit A for more details.

¹ Please note that EOA prepared a separate document that provides a scope and budget for WY 2021 water quality monitoring tasks.

TASK SM21 – 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 SM21.01: 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 as needed. 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: \$67,068

SUBTASK SM21.02: 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 2020/21 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 2020/21 workgroup meetings.

Deliverables:

- One EOA manager will attend three of the FY 2020/21 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 2020/21 meetings of the Stormwater Committee ad-hoc permit implementation workgroup.

Budget: \$13,920

SUBTASK SM21.03: 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: \$4,640

SUBTASK SM21.04: 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: \$1,856

SUBTASK SM21.05: 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, conference 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, conference 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: \$14,296

SUBTASK SM21.06: PERMIT RE-ISSUANCE SUPPORT

EOA will support to the Countywide Program during the process to reissue the MRP, which expires December 2020. During FY 2020/21, tasks will include:

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

Other potential FY 2020/21 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 2020/21 tasks to be conducted on an as needed basis (with approval from the Program Manager).

Budget: \$59,728

TASK SM22 – SUBCOMMITTEE SUPPORT

SMCWPPP's subcommittees provide regular forums for engagement with San Mateo County Permittee staff on key permit implementation issues. During FY 2020/21, 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 SM22.01: 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. During the meetings, EOA will also provide updates on the MRP reissuance process, with a focus on Provision C.2.

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.

Regional Water Board staff is currently proposing changes to reporting requirements in Provision C.2 in the reissued MRP (MRP 3.0). Depending on the final reissued MRP requirements, and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in Provision C.2 of the reissued MRP.

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.
- Participation on behalf of San Mateo County Permittees in the MRP 3.0 workgroup discussing Provision C.2 changes. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.
- SMCWPPP Annual Report content addressing MRP Provision C.2.

Budget: \$12,042

SUBTASK SM22.02: NEW DEVELOPMENT SUBCOMMITTEE

EOA will continue to support the Countywide Program's New Development Subcommittee (NDS) (which has merged with the SMCWPPP GI Committee), with a focus on compliance with MRP Provisions C.3 (New Development and Green Infrastructure), 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, RQP, 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 Media 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., including updates from the MRP 3.0 C.3/GI workgroup. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.

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 media 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 2020/21, 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 (Version 1.0, February 2020) to make it consistent with any updates made by other C/CAG consultants to the Green Infrastructure Design Guide (Version 2.0, February 2020). In general, EOA will support other C/CAG consultants as needed in their efforts to update the GI Design Guide as needed.

Deliverables:

- Facilitation of quarterly NDS meetings, including developing agendas, other meeting materials, and meeting summaries. Updating NDS members on the MRP reissuance process, with focus on MRP 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 3.0 C.3/GI workgroup. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.
- 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 media 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: \$88,892

SUBTASK SM22.03: 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. During the meetings, EOA will also provide updates on the MRP reissuance process, with focus on Provisions C.4 and C.5.

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. As needed, EOA will develop enforcement strategies and BMPs for new categories of mobile businesses and incorporate into the inventory.

We anticipate that in FY 2020/21 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. During the previous fiscal year, the Subcommittee developed core outreach materials for inspection programs (general business BMPs, restaurant BMPs and vehicle service BMPs). However, as the municipal inspectors use these materials and gain more experience there may be a need for updates, improvements, or new fact sheet topics. The additional assistance may also 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. In addition, Regional Water Board staff is currently proposing changes to Provision C.4 and C.5 in the reissued MRP (MRP 3.0). Kristin Kerr will continue to represent SMCWPPP in the BASMAA MRP 3.0 C.4/C.5 workgroup meetings. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.

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.
- Participation in the BASMAA MRP 3.0 C.4/C.5 workgroup on behalf of San Mateo County MRP Permittees. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.
- 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, 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 or residents, as needed.

Budget: \$39,184

SUBTASK SM22.04: 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. During the meetings, EOA will also provide updates on the MRP reissuance process, with focus on Provision C.10.

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.

Regional Water Board staff is currently proposing changes to Provision C.10 in the reissued MRP (MRP 3.0). Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP. John Fusco will continue to represent SMCWPPP in the BASMAA MRP 3.0 C.10 workgroup meetings.

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: \$21,200

SUBTASK SM22.05: 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 (SSID) 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 2020/21, 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 2021 so that the most important outcomes to be reported in the Urban Creeks Monitoring Report (UCMR), which is due March 31, 2021, can be discussed. 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 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., Urban Creeks 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: \$5,386

SUBTASK SM22.06: 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 and other areas in the public right-of-way with landscaping. 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 2020/21, 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: \$5,088

TASK SM23 – 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 SM23.01: 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 updated 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 in-person training workshops with smaller focused training activities. An in-person training workshop is scheduled for FY 2019/20. During FY 2020/21, EOA will work with the CII Subcommittee to identify and implement focused training activities. In the past EOA has used this budget for activities such as developing the self-training materials, holding a small roundtable IDDE training, and updating the *How to Conduct Stormwater Inspections* guidance document.

Deliverables:

- Typical deliverables for the focused training include guidance documents, outreach materials, or inspector roundtable meetings.

Budget: \$7,848

SUBTASK SM23.02: NEW/REDEVELOPMENT AND CONSTRUCTION SITE MANAGEMENT TRAINING PROGRAM

MRP 2.0 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. As Permittees implement their individual municipal GI Plans, new training needs may be identified. Additionally, as the new requirements of MRP 3.0 become apparent, the EOA will work with the NDS to identify new training materials.

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);
- Design review of GI projects and use of the Green Infrastructure Design Guide (C.3.j);
- Typical GI Detail development and use and updates to the C.3 Regulated Projects Guide (C.3.j);
- Compliance review of regulated projects (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);
- Maintenance of stormwater control measures; and
- Example projects and case studies.

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 or on-line format developed;
- 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;
- 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: \$36,530

SUBTASK SM23.03: 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 focused on pest management issues in municipal parks and other areas in the public right-of-way with landscaping.

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 2020/21, 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: \$10,796

TASK SM24 – 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 during MRP 3.0. 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:

- Assisting with 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 revisions consistent with MRP 3.0.

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

SUBTASK SM24.01: 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 2020/21 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 2020/21 Annual Report submittals.

Budget: \$47,436

SUBTASK SM24.02: 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 workplans, 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 2020/21 Litter Work Group workplan, during FY 2020/21 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** – Work with the Litter Work Group to hold a roundtable event for San Mateo County Permittees and other stakeholders. The event will include presenting and discussing opportunities for and barriers to enhanced coordination of trash control measure implementation. EOA will work with the Litter Work Group to select roundtable topics such as trash sources, trash control measure types, and ongoing collaboration. The outcome of the roundtable will be determined in coordination with the Litter Work Group in accordance with the Litter Work Group workplan.
- **Stormwater Trash Characterization Study** – Work with the Litter Work Group to conduct the study using the sampling and analysis plan developed in FY 2019/20 and produce a summary report. The study will focus on evaluating the effectiveness of existing trash source control actions and filling information gaps on the dominant types of trash in stormwater runoff in San Mateo County. The data generated will inform future implementation of source control measures in San Mateo County.
- **Annual Workplan Development** – Work with the Litter Work Group to identify high priority tasks that should be conducted by SMCWPPP in FY 2021/22, to the extent that budget is available. After review by the Litter Work Group, a draft workplan will be distributed to the Trash Subcommittee for review.
- **Coordinate with Other Efforts** – Work with the Litter Work Group to 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 San Mateo County Permittees and stakeholders to reduce litter.
- Implementation of a trash characterization study and development of a summary report documenting the results of the study.
- Draft and final FY 2021/22 workplan for the Litter Work Group consistent with future needs and budgets.

Budget: \$52,416

SUBTASK SM24.03: 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 2020/21, 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: \$137,810

SUBTASK SM24.04: 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 2020/21, 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: \$ 17,012

SUBTASK SM24.05: 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 4.5 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 2020/21, 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: \$36,806

TASK SM25 – 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 lead this task. Subtask descriptions, deliverables and budgets are provided below.

SUBTASK SM25.01: 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 continue working 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 SM27.05). 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 2020/21, EOA will continue to assist San Mateo County Permittees to make 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.
- Planning and implementing reasonable control measures towards achieving San Mateo County’s load reduction performance criteria this permit term.

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.

- 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.
- 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.
- 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.

Finally, this subtask will include responding to any comments from Regional Water Board staff on SMCWPPP's PCBs and Mercury Control Measures Plan that will be submitted in September 2020 per the requirements of MRP Provisions C.11/12.d.

Deliverables

- Report (submitted with the FY 2020/21 Countywide Program Annual Report) documenting progress towards identifying priority PCBs control watersheds and management areas, specific control measures, and PCBs and mercury load reductions achieved this permit term through FY 2020/21.
- 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.
- Working with C/CAG staff as needed on all aspects of Provisions C.11/12 compliance.
- Participating in regional POCs Steering Committee meetings.
- Respond to any comments from Regional Water Board staff on SMCWPPP's PCBs and Mercury Control Measures Plan that will be submitted in September 2020 per MRP Provisions C.11/12.d.

Budget: \$32,176

SUBTASK SM25.02: 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.

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: \$9,096

SUBTASK SM25.03: 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., including working with the Program Manager to coordinate related efforts by San Mateo County Environmental Health (CEH). EOA will also compile available related data from CEH and incorporate into a section of the Countywide Program's Annual Report that addresses the C.12.h reporting requirement.

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.

Budget: \$3,436

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

TASK SM26 – 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 (these annual workshops are typically held only during the first few years of the permit term), 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 (see Subtask SM24.05, Assist with Annual Reporting and Load Reduction Calculations). EOA's review of the trash control sections of San Mateo County Permittee annual reports is also covered under Subtask SM24.05.

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 SM26.01: 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 SM22 (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 review of a draft of the Countywide Program's Annual Report by San Mateo County Permittees.

Deliverables

- Draft of the Countywide Program's FY 2019/20 Annual Report by mid-August 2020 and final report for submittal by September 30, 2020.

Budget: \$17,360

SUBTASK SM26.02: 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 by mid-July 2020.

Budget: \$7,826

SUBTASK SM26.03: 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 2020. Review of the public outreach sections not included.

Budget: \$12,328

SUBTASK SM26.04: 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. If requested by Regional Water Board staff, 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, 2020. If requested by Regional Water Board staff, hard copies submitted by October 15, 2020.

Budget: \$2,808

EXHIBIT A

EOA FY 2020/21 Municipal Stormwater Permit Compliance Assistance to SMCWPPP

		EOA Hourly Rate for SMCWPPP:	Principle	Manager III	Manager II	Manager I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical	Expenses/Subs	Budget
		\$242	\$227	\$225	\$222	\$204	\$181	\$162	\$154	\$151	\$123	\$112	\$99	\$74			
General Support to Program Manager																	
SM21.01	General Support	0	288	0	0	0	0	0	0	0	0	0	0	0	8	\$1,100	\$67,068
SM21.02	Stormwater Committee Support	0	60	0	0	0	0	0	0	0	0	0	0	0	0	\$300	\$13,920
SM21.03	BASMAA Activities Support	0	20	0	0	0	0	0	0	0	0	0	0	0	0	\$100	\$4,640
SM21.04	BASMAA Regional Projects Planning Support	0	8	0	0	0	0	0	0	0	0	0	0	0	0	\$40	\$1,856
SM21.05	Coordination and Integration	2	48	0	0	0	0	0	0	16	0	0	0	0	0	\$500	\$14,296
SM21.06	Permit Re-issuance Support	32	192	32	0	0	0	0	0	0	0	0	0	0	0	\$1,200	\$59,728
		34	616	32	0	0	0	0	0	16	0	0	0	8	\$3,240	\$161,508	
Subcommittee Support																	
SM22.01	Municipal Maintenance Subcommittee	0	0	50	0	0	0	0	0	0	0	0	0	8	200	\$12,042	
SM22.02	New Development & Construction Subcommittee (NDS)	0	72	0	0	298	0	0	0	38	0	0	0	32	\$3,650	\$88,892	
SM22.03	Commercial/Industrial/Illicit (CII) Discharges Subcommittee	0	0	132	0	0	0	0	0	40	0	0	0	6	\$3,000	\$39,184	
SM22.04	Trash Subcommittee	32	0	0	0	64	0	0	0	0	0	0	0	0	\$400	\$21,200	
SM22.05	Watershed Assessment and Monitoring (WAM) Subcommittee	0	2	16	0	0	0	0	8	0	0	0	0	0	\$100	\$5,386	
SM22.06	Parks Maintenance and IPM (PM&IPM) Workgroup	0	4	0	0	20	0	0	0	0	0	0	0	0	\$100	\$5,088	
		32	78	198	0	382	0	0	8	78	0	0	0	46	\$7,450	\$171,792	
Training																	
SM23.01	CII Training	0	0	32	0	0	0	0	0	0	0	0	0	2	\$500	\$7,848	
SM23.02	New/Redevelopment and Construction Trainings	0	30	24	0	88	0	0	0	0	0	0	0	32	\$4,000	\$36,530	
SM23.03	Pesticide Toxicity Reduction Training	0	4	0	0	24	0	0	0	16	8	0	0	8	\$1,000	\$10,796	
		0	34	56	0	112	0	0	0	16	8	0	0	42	\$5,500	\$55,174	
Trash Load Reduction																	
SM24.01	Long-Term Trash Load Reduction Plan Support	60	0	0	0	75	0	40	0	24	40	0	0	8	\$2,000	\$47,436	
SM24.02	Litter Workgroup	30	0	0	0	125	0	0	0	44	40	0	0	8	\$7,500	\$52,416	
SM24.03	Trash Load Reduction Assessment Program	32	0	0	0	24	0	0	0	250	360	0	360	0	\$7,500	\$137,810	
SM24.04	Trash Hot Spot Cleanup Tracking and Reporting	4	0	0	0	32	0	0	0	48	16	0	0	0	\$300	\$17,012	
SM24.05	Assist with Annual Reporting and Load Reduction Calculations	24	0	0	0	32	0	0	0	80	50	0	60	0	\$300	\$36,806	
		150	0	0	0	288	0	40	0	446	506	0	420	16	\$17,600	\$291,480	
Mercury and PCBs Load Reduction																	
SM25.01	Identify PCBs and Mercury Management Areas and Control Measures	0	64	0	0	40	0	24	0	24	8	0	0	8	\$400	\$32,176	
SM25.02	Assist with Programs to Manage PCBs during Demolition - Data Collection/Evaluation	0	32	0	0	8	0	0	0	0	0	0	0	0	\$200	\$9,096	
SM25.03	Risk Reduction Coordination and Reporting	0	8	0	0	4	0	0	0	4	0	0	0	0	\$200	\$3,436	
		0	104	0	0	52	0	24	0	28	8	0	0	8	\$800	\$44,708	
Annual Reporting																	
SM26.01	Countywide Program Annual Report	0	32	0	0	16	0	0	0	40	0	0	0	8	\$200	\$17,360	
SM26.02	Annual Report Guidance	0	10	8	0	12	0	0	0	8	0	0	0	0	\$100	\$7,826	
SM26.03	Review Draft Permittee Annual Reports	0	16	16	0	24	0	0	0	0	0	0	0	0	\$200	\$12,328	
SM26.04	Submit Permittee Annual Reports	0	4	0	0	0	0	0	0	8	0	0	0	8	\$100	\$2,808	
		0	62	24	0	52	0	0	0	56	0	0	0	16	\$600	\$40,322	

Total Budget: **\$35,190** **\$764,984**

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.