

NOTICE OF MEETING NPDES TECHNICAL ADVISORY COMMITTEE (TAC)

TUESDAY, APRIL 21, 2015 – 10 AM to NOON
SAN MATEO MAIN LIBRARY, OAK ROOM
55 WEST THIRD AVENUE, SAN MATEO
(See location map on back)

AGENDA

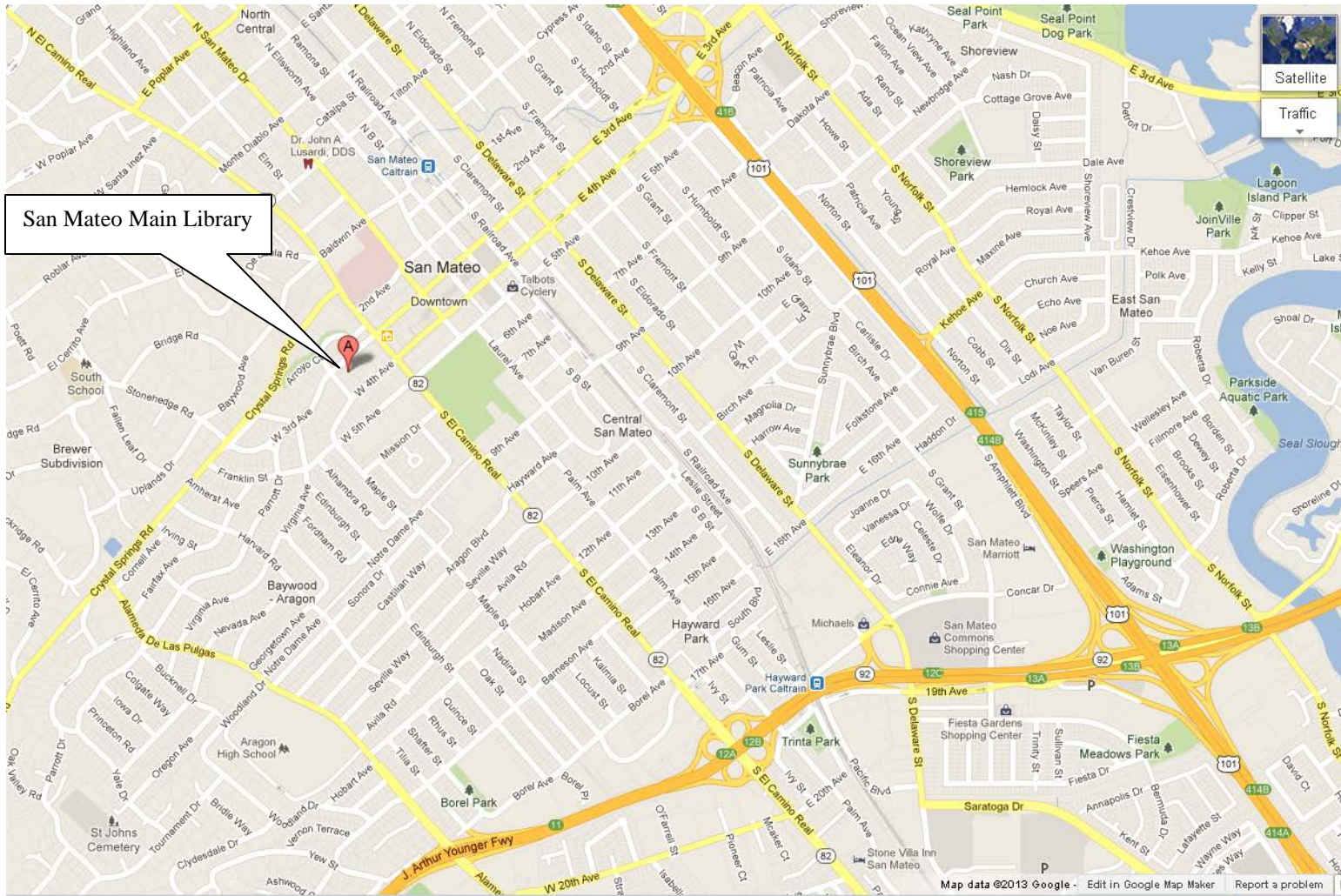
1. **INTRODUCTIONS, ANNOUNCEMENTS, AGENDA REVISIONS – MATT FABRY, Countywide Program Coordinator**
2. **PUBLIC COMMENT ON ITEMS NOT ON THE AGENDA** (limited to two minutes per speaker)
3. **APPROVAL OF MINUTES FROM PREVIOUS MEETING**
4. **REGULAR AGENDA**
 - A. **INFORMATION – UPDATE ON MUNICIPAL REGIONAL PERMIT REISSUANCE (FABRY, JON KONNAN, EOA)**
 - B. **INFORMATION – UPDATE ON POTENTIAL NEW WATER MANAGEMENT AGENCY (FABRY)**
 - C. **INFORMATION – MRP COMPLIANCE OVERVIEW/QUARTERLY CHECK-IN (KONNAN)**
 - D. **INFORMATION – STATE/REGIONAL STORMWATER ISSUES & REGULATIONS UPDATE (KONNAN)**
 - E. **INFORMATION – OTHER ISSUES, SUBCOMMITTEE UPDATES**
5. **NEXT MEETING – July 21, 2015**

Post by 5:00 P.M., Friday, April 17, 2015

NOTE: Persons with disabilities who require auxiliary aids or services in attending and participating in this meeting should contact Matthew Fabry at 650-599-1419, five working days prior to the meeting date.

Public records that relate to any item on the agenda for a regular NPDES Technical Advisory Committee (TAC) meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members of the TAC. The TAC has designated C/CAG's office at 555 County Center, 4th Floor, Redwood City, for purpose of making those public records available for inspection. The documents are also available on the Countywide Program's website at www.flowstobay.org, and C/CAG's website, at the link for agendas for upcoming meetings. The website is: <http://www.ccag.ca.gov>.

MEETING LOCATION
San Mateo Main Library, Oak Room, 55 West Third Avenue, San Mateo
(PARK IN LIBRARY'S UNDERGROUND GARAGE)



C/CAG AGENDA REPORT

Date: April 21, 2015
Item: 3
From: Matthew Fabry, Program Coordinator
Subject: Approval – NPDES TAC meeting minutes – October 21, 2014

(For further information or response to questions, contact Matthew Fabry at 650-599-1419)

RECOMMENDATION

Approve October 21, 2014 NPDES Technical Advisory Committee meeting minutes as drafted.

ATTACHMENTS

1. Draft October 21, 2014 Minutes

**NPDES Stormwater
Technical Advisory Committee (TAC)
REPORT OF MEETING**

**TUESDAY, OCTOBER 21, 2014
10:00 to NOON
CITY OF SAN MATEO**

1. INTRODUCTIONS, ANNOUNCEMENTS, AGENDA REVISIONS: Self-introductions were made. Matt Fabry (Program Coordinator) reported that C/CAG has partnered with the Bay Area Water Supply and Conservation Agency (BAWSCA) to implement a rain barrel rebate program. It went into effect in October and individual municipal BAWSCA members in the Bay Area (i.e., municipal water agencies) may or may not participate. The rebate is \$50 from C/CAG for San Mateo County installations and up to another \$50 from the local BAWSCA agency, if participating. The minimum rain barrel size for the rebate program is 50 gallons. After subtracting administrative and database costs, there is enough funding for C/CAG rebates on roughly 400 barrels. BAWSCA has partnered with vendors to conduct some trainings and is looking for a space with classroom and parking lot to display barrels – Matt asked if any committee members could provide such a space.

Matt noted that the State Water Resources Control Board adopted a new NPDES permit fee schedule that includes a one-time 8.9% discount for stormwater Permittees rather than the originally proposed 10% increase. The fees no longer show a separate SWAMP surcharge as a line item, which gives the appearance that the fee went up when it actually stayed flat (prior to one-time discount).

Jon Konnan (EOA, Inc.) noted that all San Mateo County Permittee Annual Reports were submitted on time and that drafts of most of these reports were reviewed by EOA.

Patrick Ledesma with San Mateo County Environmental Health (CEH) has been working with Kristin Kerr (EOA, Inc.) to have CEH report on all stormwater inspections that it conducts, not just inspections with violations, and to get inspection reports to agencies sooner. Patrick discussed other potential improvements to the inspection data management and reporting process. Matt suggested revisiting the Memoranda of Agreement (MOA) between CEH and agencies with reissuance of the permit. This would be a good opportunity to update the MOA, for example, to reflect the improvements that Patrick discussed. Matt will work with Patrick and Kristin on this.

Matt noted that C/CAG approved extending the contract with CEH through June 30, 2015 to continue implementing public education and outreach activities in accordance with the MRP. The PIP Subcommittee should provide feedback to Matt on outreach requirements for the reissued permit. Committee members noted that increasing outreach related to trash control and additional collaboration with San Mateo County RecycleWorks would be desirable.

It was announced that the City of San Mateo has two environmental compliance inspector positions open and the City of San Carlos has an opening for City Engineer.

2. PUBLIC COMMENT ON ITEMS NOT ON THE AGENDA: None.

3. APPROVAL OF MINUTES FROM PREVIOUS MEETING: The draft July 2014 minutes were adopted as written.

4. REGULAR AGENDA

A. INFORMATION – UPDATE ON MUNICIPAL REGIONAL PERMIT REISSUANCE:

Matt noted that the MRP expires on November 30, 2014. RWB staff plans to release a draft revised MRP (MRP 2.0) in February 2015 with the intent that it be adopted in time to go into effect by July 1, 2015. Tom Mumley, Assistant Executive Officer, presented RWB staff's proposed MRP 2.0 framework to the C/CAG Stormwater Committee on October 16, 2014. Matt and Jon verbally summarized each slide in Dr. Mumley's presentation:

- Slide 1: Title Slide – Dr. Mumley emphasized the need to get the permit right even though the reissuance might be late. The Steering Committee and workgroups have been working hard for over a year on reissuance and his staff is ready to put words on paper, but the devil is in the details. This presentation focuses on the big picture reissuance issues with cost challenges.
- Slide 2: MRP 2.0 Goals – Permittees shouldn't be asking the question "what is the minimum I can do to get by" – this would show the wrong attitude and an approach that would lead to prescriptive requirements. The permit needs prescriptiveness of details that allows for enforcement but is flexible enough to avoid constraining good actors – needs to strike a balance. Three platforms for collaboration encouraged during MRP 1.0: region-wide, countywide, and local agency. This will continue and we need even greater collaboration with entities outside the stormwater world for implementing a Green Infrastructure (GI) vision, e.g., collaboration with transportation investments and climate change abatement efforts. Also need improved communication and collaboration between Permittees and RWB staff. MRP 2.0 will eliminate certain requirements with limited benefits – these are mainly tweaks but will remove some nuisances and save some resources, though not major dollars.
- Slide 3: Permit Elements – Dr. Mumley made the following comments about various elements of the reissued permit:
 - New/Redevelopment, Trash, and PCBs/Mercury – these are areas that will have major resource implications.
 - Municipal Operations – not much change anticipated, but rolling back pump station monitoring. Matt noted this includes dissolved oxygen and inspections.
 - Illicit Discharge Elimination – no major changes.
 - Allowed Non-stormwater – potable water related requirements will need to be consistent with the state permit under development, which will include a numeric effluent limit for chlorine but should be slightly less costly to implement than MRP 1.0.
 - Industrial/Commercial Controls – no major changes.
 - Monitoring – working with stormwater program staff to make sure we are answering questions and informing management actions including verifying that they are working. Making some meaningful changes in MRP 2.0 including adding flexibility. Reasonable use of resources is also a consideration. Jon noted anticipated changes are mainly tweaks in response to lessons learned and the overall cost of implementation will likely not change much.
 - Public Outreach – from day one it has been important to inform and engage the public. When MRP 1.0 requirements were developed asked Permittees what do you want us to require? Best measure of success is whether the public supports your municipal stormwater program. There is value to having specific outreach targets, such as trash and pesticides.
 - Pesticides – no major changes.

- Slide 4: New and Redevelopment – Permittee representatives have said from day one the pain is not worth the gain to lower the regulated project threshold to 5,000 square feet. Leveraging GI is a preferred path of compliance. Road reconstruction was given a pass during MRP 1.0 due to challenges in exchange for 10 green street pilot projects. These pilots demonstrated green streets can happen and they are the right thing to do. A lot of action on roads regarding pollutants. MRP 2.0 will encourage GI as the preferred pathway by providing exceptions to 1) the 5,000 square feet threshold and 2) road reconstruction treatment requirements when a GI plan is prepared. The intent is that a robust GI planning process will lead to better cumulative benefits than piecemeal approaches such as lowering the threshold. Matt noted an example would be projects between 5 and 10,000 square feet paying an in lieu fee to fund GI implementation. Sarah Scheidt asked would GI be required to treat the C.3 volume? Matt responded this is not yet resolved but there are significant real world constraints to treating that volume. Julie Casagrande asked about the timing of the GI plans. Matt responded they would be developed over the entire permit term with some opportunistic early implementation.
- Slide 5: New and Redevelopment (cont.) – Four changes expected for MRP 2.0 that are somewhat above and beyond but should not require huge resources are as follows: 1) LID system inspections at time of installation rather than within 45 days, 2) O&M enforcement response plan required, 3) include pervious pavement/pavers design specs and O&M requirements, 4) require recurring inspection of pervious pavement/pavers. Rob Lecel noted that it is challenging to get contractors to follow your desired timing on LID system inspections.
- Slide 6: Trash Load Reduction – This is a priority issue that will be costly. The original approach was to require percent reductions compared to baseline trash loads. However, it has proven to be very difficult to quantify the baseline since there is high uncertainty and variability among municipalities. The expected alternative approach will include requiring a 70% reduction (possibly by July 2019) based on areal percent of trash management areas managed with full trash capture or observation-verified equivalents. RWB staff continues to say that any community that has large challenges should talk to them (e.g., Richmond, Oakland, and San Jose). The proposed statewide trash policy under development in Sacramento is being revised in response to comments but major changes are not anticipated and it should mainly endorse the Bay Area approach. Patrick asked what would a 100% reduction mean and Matt responded no visual impact. The group discussed the difficulties with monitoring trash including where to monitor - receiving water vs. other places.
- Slide 7: Trash Load Reduction (cont.) – MRP 2.0 may require a mandatory minimum amount of trash full capture, possibly tied to bad actors. GI should count as full capture – this needs to be worked out. Hot spot cleanups will be sustained. The group discussed that Caltrans will spend large amounts of money, this should happen in a way consistent with municipal trash requirements in the Bay Area. To address multiple TMDLs efficiently the Caltrans permit includes “compliance units” for treatment infrastructure with incentives to work with local agencies. Sarah asks if any agencies have started working with Caltrans? Matt noted Caltrans is looking for opportunities to partner and realize the incentives.
- Slide 8: PCBs TMDL Urban Runoff Requirements – TMDL’s 20-year phased approach to reduce total urban runoff PCB loading to the Bay from estimated 20 kg/year to the Bay Area-wide allocation of 2 kg/year is: 1. Desktop Work → 2. Pilot Work (MRP 1.0) → 3. Focused Implementation (MRP 2.0) → 4. Full Implementation. The regional allocations presented in TMDL are currently not in play. Mo Sharma asked will PG&E be engaged? Dr. Mumley stated yes they have been and RWB staff is reasonably OK with their self-management but if Permittees find PG&E sources they can turn over to RWB staff. USEPA is trying to find and cleanup sources in East Bay.
- Slide 9: PCBs Control – Focused implementation framework: X% reduction in Y watersheds for cumulative benefit of Z kg/year load reduction, X has to be measurable, starting level for Z is 5 kg/year total (Bay Area-wide) but may be adjusted up or down based on implementation timing. In general, RWB staff is struggling with how prescriptive to make the MRP 2.0 PCBs control requirements. Jon noted it is

not clear that we can meet that load reduction or even determine whether or not we met it. It needs to be presented as a goal to the extent possible.

- Slide 10: Focused Implementation in Two Types of Watersheds – 1) High PCBs watersheds with old industrial land uses mainly near Bay margins where controls are most cost-effective, and 2) moderate PCBs watersheds with mixed land uses, most old urban areas fall into this category.
- Slide 11: PCBs Controls – During the MRP 2.0 permit term will push for more action to attain total load reduction of 2 kg/year PCBs (Bay Area-wide) in high PCBs watersheds. Commitment to implementation actions could result in more time for Permittees - hard commitment means infrastructure change. Randy Breault asked – how much time? Dr. Mumley notes that GI implementation will take decades – 30 to 50 years could be realistic. We need to “get the train going” and maybe it will speed up or maybe more barriers will be found.
- Slide 12: PCBs Controls (cont.) –MRP 2.0 to require robust GI plans developed within permit term with reasonable assurance of attaining total load reduction of 3 kg/year PCBs (Bay Area-wide) in moderate PCBs watersheds. Begin implementation within permit term.
- Slide 13: PCBs Controls (cont.) – A program to manage PCBs in building materials is needed. A recent study estimated that Bay Area buildings constructed in the 1950s through 1970s contain 10,000 kg of PCBs, or about 5 kg per building in caulks and sealants. PCBs have frequently been found in schools. This is a tricky issue like asbestos. RWB staff wants to work with Permittees to figure out a smart way to address PCBs in building materials.
- Slide 14: Mercury TMDL Urban Runoff Requirements – TMDL requires 50% reduction in total urban runoff mercury loading to the Bay within 20 years, i.e., from estimated 160 kg/year to the Bay Area-wide allocation of 80 kg/year. More time may be granted with demonstration of best effort and a robust implementation plan.
- Slide 15: Mercury Controls – Robust GI plans within permit term that provide reasonable assurance of achieving reductions required by TMDL within realistic time. Need infrastructure changes to minimize directly connected impervious area. Begin implementation within permit term.
- Slide 16: Green Infrastructure – GI is a preferred approach that can help address a variety of issues such as roads, new and redevelopment, PCBs, mercury and trash.
- Slide 17: Green Infrastructure – Need political and management support and buy-in, e.g., from city councils. Integrate water quality with planning for complete streets, priority development areas, and aging infrastructure replacement. Seek public buy-in and need to avoid missed opportunities. Triple bottom line for benefits: social, environmental and economic (e.g., property values). Matt noted City of San Mateo a good example for the public side of GI planning. Raymund Donguines asked how has the City of San Mateo funded its GI work? Matt responded the plan was funded through a Caltrans grant. Implementation could potentially be funded via transportation impact fees and other things like a bond measure to fix failed roadways. Some GI could be implemented via redevelopment by requiring private developments to manage public parts like sidewalks.
- Slide 18: MRP 2.0 Timeline – The desired MRP 2.0 reissuance schedule is as follows, though RWB staff is already challenged to meet this timeline.
 - Administrative draft permit – Fall 2014
 - Public notice draft permit – Winter 2015
 - RWB hearing(s) – Spring 2015
 - Effective date – July 1, 2015 (this is the most important date on this timeline)

B. INFORMATION – UPDATE ON POTABLE WATER DISCHARGE PERMIT:

Matt Fabry gave a brief overview of developments around this topic, which is most pertinent to local agencies that are potable water purveyors (about half of the agencies in San Mateo County). Potable water discharges from these municipalities are currently regulated under Provision C.15 of the municipal stormwater permit. In early July 2014, RWB staff postponed until further notice its Board's consideration of a tentative permit regulating discharges from drinking water systems under a regional NPDES permit. The postponement occurred because the State Board formally announced in June its intent to consider a statewide NPDES permit regulating similar discharges, and distributed a draft permit. The State Board posted a second revised draft permit on October 1, 2014. The permit will be considered for adoption at their November 4, 2014 meeting. Overall, the second draft permit is an improvement over the previous draft. However, not all of the Countywide Program's comments were addressed in this draft. Specifically:

1. The draft permit continues to have an exemption for water purveyors that are covered under an MS4 permit. The State Board did not add any language clarifying the MS4 permits should provide an equivalent level of protection and do not need to parallel the General Permit requirements, as requested by the Countywide Program.
2. The numeric effluent limit for turbidity was removed but the draft permit still contains a numeric effluent limit for chlorine residual.

A response to comments has not been issued yet. Any related requirements in MRP 2.0 should be consistent with the State Board permit, which has some advantages in that it has less onerous monitoring requirements relative to MRP 1.0 and only applies to planned discharges within 300 feet of a receiving water. Program staff will continue to follow and update the group on developments.

C. INFORMATION – MRP COMPLIANCE OVERVIEW/QUARTERLY CHECK-IN

Matt very briefly mentioned this 11x17 document which is included in the agenda package. It provides an update on compliance activities that should have been completed in the previous quarter and those that will need to be completed in the upcoming quarter. The document summarizes some compliance highlights but should not be thought of as a replacement for the MRP.

D. INFORMATION – STATE/REGIONAL STORMWATER ISSUES & REGULATIONS UPDATE

A Regulatory Tracking Table was included in the agenda package but not discussed for lack of time.

F. INFORMATION – OTHER ISSUES, SUBCOMMITTEE UPDATES:

Municipal staff should refer to the agenda package for a summary of upcoming meetings and workshops and minutes from last month's subcommittee and workshop meetings.

5. NEXT MEETING: The next meeting is scheduled for January 20, 2015 at the usual location: the Oak Room in the City of San Mateo Main Library. <Editorial note: this meeting was cancelled>

MEETING ADJOURNED

C/CAG AGENDA REPORT

Date: April 16, 2015
To: Stormwater Committee
From: Matthew Fabry, Program Coordinator
Subject: Receive update on the revised draft Municipal Regional Permit

(For further information or questions contact Matthew Fabry at 650 599-1419)

RECOMMENDATION

Receive update on the revised draft Municipal Regional Permit.

BACKGROUND

Regional Water Board staff released in early March an Administrative Draft of a revised Municipal Regional Permit (MRP), which expired at the end of November last year. The MRP is issued for five year terms. Stormwater programs and permittees collaborated at the regional level to provide Water Board staff consolidated comments on the Administrative Draft, which primarily took the form of redline/strikeout versions of the draft permit provisions. Staff will provide an overview of the highest priority concerns identified by stormwater agencies, which are focused on provisions for Trash Load Reduction, Mercury and Polychlorinated Biphenyls (PCBs) Controls, and New and Redevelopment/Green Infrastructure. These issues are detailed in Attachment 1.

Regional Board staff responded to these priority issues at a regional MRP 2.0 Steering Committee on April 2. Draft notes from that meeting are included as Attachment 2.

ATTACHMENTS

1. Priority Issues in MRP 2.0 for Provisions C.3, C.10, and C.11/12
2. Draft Meeting Notes – April 2, 2015 MRP 2.0 Steering Committee

ATTACHMENT 1 – PRIORITY ISSUES IN MRP 2.0

Provision C.3

1. Green Infrastructure – required level of effort and time frames for MRP 2.0 compliance, for both GI plans and early implementation
2. LID Definition – giving bioretention equal status to other LID measures and eliminating feasibility analysis.
3. Hydromodification – consolidation of requirements and allowance of an alternative sizing approach (direct simulation of erosion potential) to meet the existing HM standard
4. O&M Verification of Pervious Pavement – limit to installations on Regulated Projects approved after Permit effective date and above a certain size threshold for certain uses (as recommended in early input submittal).

Provision C.10

1. Frequency and timing of compliance dates (including 2022 "no adverse effect" date)
2. Geographical extent and frequency of on-land trash assessments
3. Accounting for source control benefits and creek/shoreline cleanup actions
4. Intent/purpose of receiving water observations

Provision C.11/12

1. Approach to compliance: BMP-based vs. load reduction requirement or a hybrid, and linkage to GI provisions in C.3. Permittees need clear and feasible pathway to compliance.
2. Accounting – can we agree on the scope and assumed interim benefits of major BMP programs before the permit is adopted?
3. Management of PCBs in building materials during demolition – what is the best approach and over what time frame?

MRP 2.0 Steering Committee Meeting Notes

April 2, 2015, 1:00 to 3:30 pm

State Building, 1515 Clay St., Oakland CA, 2nd Floor Room 15

I. Introductions, Announcements, Changes to Agenda

Matt Fabry (BASMAA Chair/ SMCCWP) – reported that the BASMAA Phase I Managers had submitted consolidated comments on most of the Administrative Draft MRP 2.0 provisions by March 27, as requested by Water Board staff. Today’s meeting will focus on key issues for three provisions: C.3/GI, C.10 (trash), and C.11/12 (POCs). He noted that proposals for most of the key issues had been provided as part of the consolidated comments, but Water Board staff has not had time to respond to the early input.

II. Phase I Program Managers’ Summary of Discussions and Additional Early Input – High Priority Issues (see Attachment 1)

- New and Redevelopment/Green Infrastructure (C.3/GI) – Jill Bicknell (SCVURPPP/EOA)
- Trash (C.10) – Chris Sommers (SCVURPPP/EOA)
- POCs (C.11/12) – Jon Konnan (SMCWPPP/EOA)
 - Accounting method - working on two things:
 - What BMP programs would look like
 - What load reductions could be attached to those programs
 - Workgroup has internal draft of approaches and will meet internally on Monday. Would like to set up a meeting with WB staff next week.
 - Management of PCBs in building materials
 - WB staff looking for programs managed by municipalities
 - BASMAA believes this is better managed at state level, but this approach will take more time

III. Water Board Staff Feedback/Discussion on Phase I Managers’ Input

- C.3 / Green Infrastructure
 - Timeframe for governing body approval -
 - Tom Mumley (WB) – why need this much time? (BASMAA proposal is approximately 20 months). Permittees can start now.
 - Kathy Cote (Fremont) – will need complete package to take to council for approval. Can’t start assigning resources before permit adopted. Will need at least 12 months to prepare framework and cost estimates, then get on council agenda.
 - Melody Tovar (Sunnyvale) – agrees, frameworks need to be customized by city. There are a lot of things in play right now.
 - Keith Lichten (WB) – seems that permittees are envisioning more elements in the framework than just a resolution supporting GI.

- Tom M. – open to giving more time if the product is more robust and meaningful. Wants this to be a Plan that works. Could it be a two-step process, with something lighter that could be done earlier?
 - Tom Dalziel (CCCWP) – significant education of councils needs to happen.
 - Tom M. – is there a particular time of year that is better to get elected officials approval? Melody – May/June is good (?)
 - Keith – thought they might see a proposal for regional or countywide options. Jill – thinks the flexibility is there in the current draft. Want to make sure there is understanding that lower level plans will be in compliance. Tom M. – wants to have continued discussion on how to make this work.
 - Different municipal reps (Kathy, Melody, Joe Calibrigo-Danville) explained their budgeting processes and why it takes time to prepare.
 - Keith – items that are still in play include linkage to TMDLs and the details of the early implementation requirements. Thinking that one approach may be to have each permittee be required to do one GI project.
 - Tom M -- could have a two-tier approach: 1) general GI plans for all; and 2) focused number of GI plans are more robust to demonstrate reasonable assurance of meeting TMDL loads.
 - Melody -- asked for more training on how to demonstrate reasonable assurance. Tom M. -- usually need modeling to demonstrate pollutant load reductions. Hopes to host a workshop on conducting this analysis.
 - Jill – can we set up a meeting to continue dialog on the GI provision? Keith – may not have time to do it this month. Tom M. – committed to doing it either in this phase or after next draft comes out.
- LID Definition (bioretention as top tier LID)
 - Keith – short answer is yes, with EPA’s support and a few details to work out. Tom M. – condition on the “yes” is good GI planning.
 - Hydromodification
 - Keith – Geosyntec presentation on alternative sizing approach (at last C3 Workgroup meeting) was good. Open to other approaches to meet HM standard, but thinks process may need to be more robust, i.e., may need permit amendment to include new approach.
 - Keith – also mentioned that they wanted to discuss the history of how the three exemptions for hydromod control came about and whether we may be missing opportunities to protect streams.
 - Dan – pointed out that the requirement for LID treatment everywhere is helping to provide HM protection throughout the watershed.
 - Biotreatment Soil Specifications
 - Keith – OK to take out of permit, but want to clearly reference an approved soil specification and have a technical review process that includes Water Board staff.

- Special Project language
 - Keith - open to a lot of the revisions proposed, including letting go of statement that Special Project credits will be discontinued in next permit
 - Sue Ma (WB) – still want to keep reporting of potential Special Projects so they can track how projects are proceeding. Did not think it would be as useful to have to request tracking tables from permittees.
 - Dan – does not understand why there is so much emphasis on Special Projects when they represent a very small percentage of impervious area requiring treatment.
- Pervious Pavement
 - Sue -- OK with not inspecting non-regulated projects, and OK with only requiring inspection of pervious pavement installed on projects approved under MRP 2.0. However, size threshold for inspection is under debate – WB staff doesn't want us to have to inspect every little patio, but concerned about subdivisions that have a large number of pervious driveways that would be under the size threshold.
 - Dan – this creates a disincentive for pervious pavement.
 - Tom M. – this needs to be part of a GI approach and will try to avoid approaches that create disincentive.

C.10

- Frequency & timing of compliance dates
 - Dale Bowyer (WB) – don't want to arrive at the 2017/70% reduction date without compliance. 2016 is a “dress rehearsal” date.
 - Tom M – willing to eliminate 2016 compliance date but maintain it as a reporting date, as a check-in to make sure you have work in progress to get you to the 2017 compliance date.
 - Dale – what if permittees don't do the visual assessment in 2016? Need something to indicate that permittees are on track. Tom – need a dry run or some information in 2016
 - ___??_ - some cities are planning to install trash full capture devices by 2017 (i.e., have it in their CIPs) but won't be installed by 2016, so doing the work to submit a report in 2016 is a waste of resources.
 - Tom/Dale – if this is the case, then you should just be able to state that. If the permittees' plan is to use more source control measures, then they may have some concern.
 - Tom M – similarly with 2018, will consider making this more of a check-in. However, will not go before Board to ask to extend 2022 to 2025. They will see how the plans progress and may bring to Board closer to the final date. OK to submit comments on the challenges to meeting the deadlines.
- Extent and frequency of assessments
 - Tom M – recognizes that resources are needed to do assessments, but need to demonstrate effectiveness of a suite of actions.

- Dale – may need to over-assess initially to determine what is an appropriate amount and document it.
- Tom – remember that if permittee has claimed that certain actions are working, but has done light assessment, then may be vulnerable to enforcement. Suggests getting public involved to help educate and avoid citizen actions.
- Accounting for source control benefits and creek cleanup actions
 - Tom M – not in their interest to state how to account for source control in the permit; will be open to scrutiny from others, include chemical industry. Thinks we can figure out a way to justify as part of demonstration of improvement in trash generation rates in reporting. They are open to demonstrating success in a certain percentage of areas and applying reduction factor to all.
 - Chris – can we include some language in the reporting section of C.10 allowing flexibility in accounting, based on data collected?
 - Tom – open to discussion on this, thinks we can reach agreement on the reporting aspect.
 - Creeks and shorelines – Tom thinking about it as an offset approach; not motivated based on gallons collected. Are those cleanups part of a greater effort to solve a problem, or just a temporary bandaid?
 - Chris – we’ve offered language to address that. Challenge is how you compare the level of effort at a reach of a dirty creek vs. a cleaner creek? Data is collected in gallons. Encouraged him to look at the formula proposed in the admin draft comments.
 - Keith – having trouble making the link between control of MS4 discharges and direct discharges – open to suggestions
- Receiving water observations
 - Tom M – regarding compliance, compared it to the iterative approach to get to no adverse effects. If main concern is compliance, they can be more clear about what is required for meeting receiving water limits.
 - Chris/Elaine – really hard to determine where trash in receiving water is coming from
 - Tom – understands receiving water scenario is complex; thinks we should be able to work this out (may not fully resolve before next draft).
 - Dale – giving us the “opportunity” to define the receiving water monitoring
 - Keith – unclear what is being proposed for the private lands. Chris will follow up.

C.11/12

- Approach to compliance
 - Richard Looker (WB) – their interest is having a specific load reduction in this permit term. Admin draft reflects WB staff’s approach but realizes that permittees don’t believe it is a clear and feasible pathway.
- Accounting
 - Richard – WB has a draft proposal from permittees submitted with comments, and are encouraged by this approach. Permittees have proposed:

- A BMP approach with an area being addressed and an efficiency factor for load reduction.
 - For source properties...
 - For PCBs in building materials, have concept of number of buildings demolished
 - Richard is optimistic about reaching agreement on an *a priori* accounting system.
 - Tom M – agrees, but question is how? If we don't include in the permit, we could continue to develop the accounting scheme
 - Chris – suggested including in the fact sheet as an interim accounting scheme. Tom – thought this could work.
 - Jon – key is what is the compliance point – number of BMPs, or number of kg of load reduction? Tom - number for load reduction
 - Jon – not sure what the accounting is going to tell us and whether we can commit to meeting the load reduction number.
- PCBs in building materials
 - Jon – this may be the category that helps us meet the total load reduction, but this goes back to his point about doing it at the state level, and that it would take more time and not likely to achieve load reduction within this permit term.
 - Tom M – hoping that it can be done at the state or district level is opening Pandora's box. Can't municipalities commit that demolitions would be managed in a certain way?
 - Jan O'Hara (WB) – agrees that it would be large push to get this done at the state level, but would be fruitful to engage with other agencies at this level. However, she thinks municipalities need to engage at the local level in the first few years. There are available materials for BMPs on demo sites.
 - Luisa Valiela (EPA) – Jan met with EPA PCB site cleanup folks, and they do not want to be involved in this effort.
 - Napp Fukuda (San Jose) – this is not going to be simple to do at the local level. This is something that needs to be addressed at the state level so that it is applied consistently and on a level playing field.
 - Richard – understands that municipalities are generally not the source of PCBs, mainly the conveyance. However, they have responsibility to push permittees in this direction since it is a significant source.
 - Tom M – wants local municipalities to incorporate requirements into demo permits. Recognizes there are issues with waste management. Will need to do some sampling of residuals, and determination of whether sites needed to be referred as sources.
- Followup – Richard asked Jon for more information on the accounting scheme for the fact sheet.

IV. Schedule for Future SC and Workgroup Meetings

- Steering Committee Meetings
 - May 7th SC meeting cancelled (Tom M - expect next draft of MRP 2.0 to be released around that time)

- Tom M - will public notice next draft with minimum of 45-day comment period, and plan to hold a workshop at June 10th Water Board meeting.
- Tom D - would prefer 60 days. Tom M - will consider if we don't ask for extensions. Would also allow more time for constructive comments
 - Agreed to keep June 4 as potential date for next SC meeting
- Workgroup Meetings
 - C.3 Workgroup - Jill to follow up with Keith on availability for a meeting to discuss HM and/or GI issues.
 - C.10 Workgroup - Chris interested in having another meeting as well.
 - C.11/12 Workgroup - in process of setting date for next meeting.
 - Water Board staff may not be able to attend all workgroup meetings in April but willing to continue discussions after release of next draft.

Attachment 1 - "Discussion of High Priority Issues" presentation

C/CAG AGENDA REPORT

Date: April 21, 2015
Item: 4B
From: Matthew Fabry, Program Coordinator
Subject: Receive update on Potential New Water Management Agency

(For further information or questions contact Matthew Fabry at 650 599-1419)

RECOMMENDATION

Receive update on Potential New Water Management Agency.

BACKGROUND/DISCUSSION

Water management, including: flood control, sea level rise, ground water management, potable water supply and clean water compliance are interrelated issues facing the Bay Area region, including San Mateo County. To address these water management issues, the County is exploring the expansion and strengthening of the existing San Mateo County Flood Control District. The District is currently County-governed, actively manages two flood control zones, (Colma Creek and San Bruno Creek) and is a member of the San Francisquito Creek JPA.

The County is proposing to establish a single regional approach to water management (with the exception of potable water supply) to coordinate needed projects, which often cross city boundaries, due to the nature of watersheds and groundwater basins. In addition, there are issues of funding and coordination in light of pressures from regional, state and federal water management legislation.

Staff will provide a summary of the current proposal.

C/CAG AGENDA REPORT

Date: April 21, 2015
Item: 4C
From: Matthew Fabry, Program Coordinator
Subject: MRP Compliance Overview/Quarterly Check-In

(For further information or questions contact Matthew Fabry at 650 599-1419)

RECOMMENDATION

Staff will provide an update on compliance activities that should have been completed in the previous quarter and those that will need to be completed in the upcoming quarter.

ATTACHMENTS

1. Quarterly Compliance Check-In Tracking Spreadsheet

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items					
					2014				2015	
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec	Jan - Mar	Apr - Jun
C.2.a. Road Repair	Permittees shall develop and implement appropriate BMPs at street and road repair and/or maintenance sites to control debris and waste materials during road and parking lot installation, and repaving or repair maintenance activities such as those describe in the CASQA Handbook for Municipal Operations.	Provide training.	Continue to implement appropriate BMPs developed for street and road maintenance.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.b. Pavement Washing	Permittees shall coordinate with sanitary sewer agencies to determine if disposal to the sanitary sewer is available for wastewater generated from these activities provided that appropriate approvals and pretreatment standards are met.	N/A	Coordinate with sanitary sewer agency located where surface cleaning will occur to determine if disposal to the samitary sewer is available provided pretreatment requirements are met.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.b. Pavement Washing	Permittees shall implement, and required to be implemented, BMPs for pavement washing, mobile cleaning, pressure wash operations in such locations as parking lots and garages, trash areas, gas station fueling areas, and sidewalks and plaza cleaning, which prohibit the discharge of polluted wash water and non-stormwater to the storm drain.	N/A	Following your review of BASMAA's "Pollution from Surface Cleaning" BMPs http://www.basmaa.org/Portals/0/documents/pdf/Pollution%20Surface%20Cleaning.pdf implement these BMPs or more stringent BMPs for agency surface cleaning and require others to implement for their surface cleaning.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.c.i (2) Bridge & Structural Maintenance & Graffiti Removal	Permittees shall implement BMPs for graffiti removal that prevent non-stormwater and wash water discharges into storm drains.	N/A	Continue to protect nearby storm drain inlets before removing graffiti from walls, signs, sidewalks and prevent any discharge of debris, cleaning compound waste, paint waste, or washwater to storm drains or watercourses.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.c.i(1) Bridge & Structural Maintenance & Graffiti Removal	Permittees shall implement appropriate BMPs to prevent polluted stormwater and non-stormwater discharges from bridges and structural maintenance activities directly over water or into storm drains.	N/A	Determine the proper disposal method for particular wastes generated from these activities. Continue to train agency employees and/or specify in contracts the proper capture and disposal methods for waste captures. Consider using appropriate BMPs from "Caltrans Storm Water Quality Handbook Maintenance Staff Guide:" http://www.dot.ca.gov/hq/env/stormwater/special/newsetup_pdfs/management_ar_rwp/CTSW-RT-02-057.pdf	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.d.i Pump Stations	Permittees shall develop and implement measures to operate, inspect and maintain stormwater pumps stations to eliminate non-stormwater discharges containing pollutants, and to reduce pollutant loads in the stormwater discharges to comply with WQS.	N/A	Continue to implement Inspection and Sampling Plan	Muni. Maint.	--	--	--	--	--	--
C.2.d.ii.(1) Pump Stations	Complete an inventory of pump stations within each Permittees' jurisdiction, including locations and key characteristics.	N/A	Update, if needed, pump station inventory	Muni. Maint.	--	--	--	--	--	--
C.2.d.ii.(2) Pump Stations	Inspect and collect DO data from all pump stations twice a year during the dry season.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	--	--	Program: Send reminder email by August 15th to agencies of requirement for 2 samples during dry season. Agencies: collect two DO samples from pump stations during dry weather for FY 14-15 (during July - September).	--	--	--
C.2.d.ii.(3) Pump Stations	If DO levels are at or below 3 mg/L, apply corrective actions to maintain DO concentrations of the discharge above 3 mg/L. Verify corrective actions are effective by increasing DO monitoring interval to weekly until two weekly samples are above 3 mg/L.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	--	--	Follow up corrective actions and sampling as needed.	Follow up corrective actions and samples as needed.	--	--
C.2.d.ii.(4) Pump Stations	Inspect pump stations twice a year during the wet season in the first business day after one-quarter inch and larger storm events after a minimum of two week antecedent period. Post storm inspections shall include collecting and reporting presence and quantity estimate of trash, including the presence of odor, color, turbidity and floating hydrocarbons.	N/A	Continue to mplement Inspection and Sampling Plan	Muni. Maint.	Program: Send reminder email by January 15th to agencies of requirement for 2 inspections during wet season. Agencies: conduct 2 inspections after appropriate rain events.	--	--	Program: Send reminder email to inspect 2x after appropriate rain events. Agency: conduct 2 inspections after appropriate rain events.	Program: Send reminder email to agencies of requirement for 2 inspections during wet season and discuss at January Municipal Maintenance Subcommittee meeting. Agencies: conduct 2 inspections after appropriate rain events.	--
C.2.d.iii. Pump Stations	Annually report monitoring data, inspection and maintenance records, volume or mass of waste materials removed from pump stations, and any corrective actions.	N/A	Continue to complete reporting form	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

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C.2.e. Rural Public Works Construction and Maintenance	Permittees shall implement and require contractors to implement BMPs for erosion and sediment control during and after construction for maintenance activities on rural roads. Develop and implement appropriate training and technical assistance resources for rural public works activities.	N/A	If your agency has determined that it is subject to these requirements, continue to implement appropriate BMPs, such as, those contained in the FishNet 4C Roads Manual: http://www.fishnet4c.org/projects_road_s_manual.html	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.e. Rural Public Works Construction and Maintenance	Permittees shall notify the Water Board, Fish and Game, and U.S. Army Corps of Engineers, where applicable, and obtain appropriate permits for rural public works activities before work in or near creeks and wetlands.	N/A	This requirement exists regardless of whether it was included in the MRP. Continue to implement the required notification and permit acquisition processes for rural public works activities.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.e. Rural Public Works Construction and Maintenance	Permittee shall identify and prioritize rural road maintenance on the basis of soil erosion potential, slope steepness, and stream habitat resources.		If your agency has determined that it is subject to these requirements, identify and prioritize rural road maintenance.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.e. Rural Public Works Construction and Maintenance	Permittee shall develop and implement an inspection program to maintain rural roads' structural integrity and prevent impacts on water quality.		If your agency has determined that it is subject to these requirements, develop and implement an inspection program.	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.e. Rural Public Works Construction and Maintenance	Permittees shall provide training on BMPs to rural public works maintenance staff at least twice during permit term.		If your agency has determined that it is subject to these requirements, provide 2 trainings.	Muni. Maint.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.	Ongoing. Note: SMCWPPP provided training in November 2013. Applicable agencies should have provided at least one other training by end of permit term.
C.2.f. Corp Yards	Permittees shall prepare, implement, and maintain a site specific SWPPP for corporation yards, including municipal vehicle maintenance, heavy equipment and maintenance vehicle parking areas, and material storage facilities.	N/A	Implement SWPPP and update as needed	Muni. Maint.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.2.f. Corp Yards	Permittees shall inspect corporation yards at least annually before the start of the rainy season.		Conduct inspections	Muni. Maint.	--	--	Program: In August send reminder email to conduct corp yard inspections. Agencies: conduct annual corporation yard inspection for FY 14-15 reporting period before rainy season, i.e., before the end of Sept.	--	--	--
C.3.a Performance Standards	(2) Have adequate development review and permitting procedures to impose conditions of approval or other enforceable mechanisms to implement the requirements of Provision C.3.	Update C.3 Checklist	Use the Countywide Program's updated C.3 checklist to apply the C.3 requirements to development projects.	New Dev	Ongoing	Updated draft checklist prepared and distributed to the NDS for review.	Checklist presented to NDS at August 12th meeting. Comments taken.	Final version of checklist approved at the October 28th NDS meeting.	The checklist has been converted to an Excel format for additional functionality. At the Feb.10th NDS meeting comments on the draft version were received and will be addressed.	Complete Excel version of checklist and also review small projects checklist.
C.3.a Performance Standards	(3) Evaluate potential water quality effects and identify appropriate mitigation measures when conducting environmental reviews, such as CEQA.	Not Applicable	Evaluate/mitigate water quality impacts in CEQA documents.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.a Performance Standards	(4) Provide training adequate to implement the requirements of Provision C.3 for staff including interdepartmental training.	Hold countywide training workshop on requirements of Provision C.3	Provide training adequate to implement Provision C.3 requirements	New Dev	Ongoing	Annual C3 Training held on June 11th.	Ongoing	Ongoing	Ongoing	Annual C.3 Training
C.3.a Performance Standards	(5) Provide outreach adequate to implement the requirements of Provision C.3., including providing education materials to municipal staff, developers, contractors, construction site operators, and owner/builders, early in the planning process and as appropriate.	Keep flyers current, as needed	Provide C.3 flyer and (as appropriate) the hydromodification management flyer to applicants.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.a Performance Standards	(6) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate site design measures that include minimizing land disturbance and impervious surfaces (especially parking lots); clustering of structures and pavement; disconnecting roof downspouts; use of micro-detention, including distributed landscape detention; preservation of open space; protection and/or restoration of riparian areas and wetlands as project amenities.	Continue to provide guidance on site design measures.	Encourage the use of site design measures in projects that are not C.3 Regulated Projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.a Performance Standards	(7) For all new development and redevelopment projects not regulated by Provision C.3., encourage the inclusion of adequate source control measures to limit pollutant generation, discharge, and runoff, to the maximum extent practicable.	Update source control model list as needed.	Encourage the use of source control measures in projects that are not C.3 Regulated Projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

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C.3.a Performance Standards	(8) Revise, as necessary, General Plans to integrate water quality and watershed protection with water supply, flood control, habitat protection, groundwater recharge, and other sustainable development principles and policies and to require implementation of the measures required by Provision C.3 for all Regulated Projects defined in Provision C.3.b.	Not Applicable	Review General Plans to identify any need for updates based on new requirements included in Provision C.3.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.b Regulated Projects	ii. (1) Special Land Use Categories: Beginning December 1, 2011, all references to 10,000 square feet for (a) New Development or redevelopment projects changes to 5,000 square feet.	Update C.3 Checklist	Use updated C.3 checklist to apply C.3 requirements to projects that meet Special Land Use Category criteria.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.b Regulated Projects	(4)(a) Road Projects: Construction of new streets or roads, including sidewalks and bicycle lanes built as part of the new streets or roads. (4)(d) Exclusions to road project requirements. (4)(e) If application is deemed complete on/before 12/1/09, new road/trail requirements do not apply so long as project applicant is diligently pursuing the project. If, from 12/1/09 to 12/1/11, project applicant has not acted to obtain approvals, requirements apply. (4)(f) If application is deemed complete after 12/1/09, new road/trail requirements do not apply if the project receives final discretionary approval by 12/1/11.(4)(g) If funding has been committed and public road/trail construction is scheduled to begin by 12/1/12, the new requirements shall not apply.	Hold discussions of road project requirements in Subcommittee meetings as needed.	Apply C.3 requirements to road projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.b Regulated Projects	(4)(b) Widening of existing streets or roads with additional lanes of traffic. (4)(c) Construction of impervious trails greater than 10 ft wide or creek side (within 50 ft of top of bank). (Effective 12/1/11)	Hold discussions of road widening project requirements in Subcommittee meetings as needed.	Apply C.3 requirements to road widening projects.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.b Regulated Projects	iii. Green Streets Pilot Projects: The Permittees shall cumulatively complete ten pilot green street projects that incorporate LID techniques for site design and treatment in accordance with Provision C.3.c and that provide stormwater treatment sized in accordance with Provision C.3.d. (A Regulated Project may not be counted as one of the 10 pilot green street projects. (Complete construction by 12/1/14)	Coordinate with BASMAA and applicable cities as needed.	Cities with pilot green street projects (or potential pilot green street projects) will need to complete a reporting form for the project.	New Dev	--	--	Complete relevant portion of Annual Report Form (if applicable)	--	--	--
C.3.b Regulated Projects	iii. (5) Green Streets Pilot Projects: The Permittees shall conduct appropriate monitoring of these projects to document the water quality benefits achieved.	Coordinate with BASMAA and applicable cities as needed.	Municipalities with green street projects will need to coordinate with BASMAA, as BASMAA prepares report to meet this requirement. (Final report submitted Sept. 15, 2013.)	New Dev	--	--	--	--	--	--
C.3.c Low Impact Development (LID)	i.(1) Source Control Requirements [minor differences between requirements in this provision and Countywide Program's Model Source Control List]. (Implementation Date: December 1, 2011)	Update source control model list as needed	Continue implementing source control measures on the Source Control Model List.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.c Low Impact Development (LID)	i.(2) Site Design and Stormwater Treatment Requirements (a) Require each Regulated Project to implement at least one of the following [site design] strategies onsite... i.(2) Site Design and Stormwater Treatment Requirements (b) Require each Regulated Project to treat 100% of the amount of runoff identified in Provision C.3.d for the Regulated Project's drainage area with LID treatment measures onsite or with LID treatment measures at a joint stormwater treatment facility.	Hold discussion of worksheets at subcommittee meetings or training sessions as needed.	Use feasibility worksheets to require applicants to evaluate feasibility of infiltration and rainwater harvesting/use before allowing the use of biotreatment.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.c Low Impact Development (LID)	i.(2) (b)(v) Permittees, collaboratively or individually, shall submit a report on their experience with determining infeasibility of harvesting and reuse, infiltration, or evapotranspiration at Regulated Project sites.	Coordinate with BASMAA and member agencies as needed.	Collect and track information on the results of feasibility analyses, which will be the basis of the regional report.	New Dev	Final report submitted December 1, 2013.	--	--	--	--	--
C.3.c Low Impact Development (LID)	i.(2) (b)(vi) Permittees, working collaboratively or individually, shall submit for Water Board approval, a proposed set of model biotreatment soil media specifications and soil infiltration testing methods to verify a long-term infiltration rate of 5 to 10 inches/hour.	Provide information on soil specifications to soil providers.	Require projects with biotreatment measures to use the biotreatment soil specifications included in the November 28 amendment of the MRP.	New Dev	Ongoing	Permittees provided with tools to implement the requirement. The program produced a soil vendor list, checklist and guidance.	Ongoing	Ongoing	Ongoing	Soil Vendor List will be updated with new vendors.
C.3.c Low Impact Development (LID)	i.(2) (b)(vii) Permittees shall submit for Water Board approval, proposed minimum specifications for green roofs.	Not applicable	Require projects with green roofs to use the green roof specifications included in the November 28 amendment of the MRP (included in Section 6.9 of the C.3 Technical Guidance).	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

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C.3.d Numeric Sizing Criteria for Storm-water Treatment Systems	i. Require that stormwater treatment systems constructed for Regulated Projects meet at least one of the following hydraulic sizing design criteria: (1) Volume Hydraulic Design Basis; (2) Flow Hydraulic Design Basis; and (3) Combination Flow and Volume Design Basis. iv. Limitations on Use of Infiltration Devices in Stormwater Treatment Systems [minor changes since previous permit]. Implement 12/1/09.	Update hydraulic sizing criteria section in C.3 Technical Guidance	Confirm that the design of treatment measures in project submittals meet the C.3.d criteria.	New Dev	Ongoing	Ongoing	Ongoing	C3 Technical Guidance Manual updated.	Ongoing	Ongoing
C.3.e Alternative Compliance with Provisions C.3.c	i.The Permittees may allow a Regulated Project to provide alternative compliance with Provision C.3.c in accordance with one of the two options listed below: Option 1: LID Treatment at an Offsite Location; and 2: Payment In-Lieu Fees	Seek grant funding to develop green street plan and GIS planning tool	Support the Countywide Program in its efforts to develop a green street plan for retrofit projects that can be used for alternative compliance.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.e Alternative Compliance with Provisions C.3.c	iv. (1) Beginning December 1, 2011, Permittees shall track any identified potential Special Projects that have submitted planning applications but that have not received final discretionary approval. (2) By March 15 and September 15 of each year, Permittees shall report to the Water Board on these tracked potential Special Projects ... Any Permittee with no potential Special Projects shall so state.	Remind Subcommittee of required March report on Special Projects.	Submit required information on Special Projects every March and September. If your agency has no Special Projects, you must inform the Water Board that you have no applicable projects.	New Dev	Special Projects Reports Submitted on behalf of permittees on March 17, 2014.	--	Submit required information on Special Projects by September 15, 2014 (with the Annual Report). If your agency has no Special Projects, you must inform the Water Board that you have no applicable projects.	--	Special Projects Reports Submitted on behalf of permittees on March 16, 2015.	--
C.3.e Alternative Compliance with Provisions C.3.c	iv.(2) For each Special Project [reported], Permittees shall include a narrative discussion of the feasibility or infeasibility of 100% LID treatment, onsite and offsite.	Coordinate with BASMAA and Subcommittee to provide guidance on infeasibility reporting	Require applicants with Special Projects that will use LID treatment reduction credits to report a narrative discussion on why 100% LID treatment was infeasible for the project.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.f Alternative Certification of Stormwater Treatment Systems	In lieu of reviewing a Regulated Project's adherence to Provision C.3.d., a Permittee may elect to have a third party conduct detailed review and certify the Regulated Project's adherence to Provision C.3.d. [Minor change to requirements in previous permit.] No implementation date in permit. Assume 12/1/09 effective date.	Not applicable	Agencies that use Alternative Certification (3rd party review of stormwater treatment measure design) may continue to use these programs.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.g Hydromodification Management	All HM Projects shall meet the Hydromodification Management Standard of Provision C.3.g.ii. [HM exemptions from previous permit have been eliminated.]	Coordinate with Alameda and Santa Clara programs regarding training for municipal staff on how to review Bay Area Hydrology Model submittals.	Continue applying the HM requirements to project that meet the criteria for HM projects.	New Dev	Ongoing. Bay Area Hydrology Model (BAHM) training workshops set for April 8, 9 and 10.	Bay Area Hydrology Model (BAHM) training workshops completed on April 8, 9 and 10.	Ongoing	Ongoing	Ongoing	Ongoing
C.3.h Operation and Maintenance of Storm-water Treatment Systems	ii. (4) O&M Program shall include a written plan and implementation of the plan that describes O&M (including inspection) of all Regional Projects and regional HM controls that are Permittee owned and/or operated.	Not applicable	Currently there are no regional projects to which this would apply.	New Dev	--	--	--	--	--	--
C.3.h Operation and Maintenance of Storm-water Treatment Systems	ii. (5) O&M Program shall include database or equivalent tabular format of all regulated projects (public and private) that have installed ... stormwater treatment and HM controls.	Not applicable	Track O&M inspection data as required, either in an Excel spreadsheet or relational database.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.h Operation and Maintenance of Storm-water Treatment Systems	ii.(6) O&M Program shall include a prioritized plan for inspecting all installed stormwater treatment systems and HM controls. [New requirements added since pervious permit.]	Not applicable	Keep your agency's O&M verification inspection plan up to date, as needed, and continue implementing the plan.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.3.i Detached Single-Family Home Projects	i. Require all detached single-family home projects that create and/or replace 2,500 square feet or more of impervious surface to implement one or more stormwater lot-scale BMPs. (Implement 12/1/12)	Coordinate with BASMAA to develop standard specifications. Provide training on C.3.i requirements	Implement the new requirements on December 1, 2012, using standard specifications that BASMAA is scheduled to complete in September 2012.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.4.a. Legal Authority	Permittees shall have sufficient legal enforcement authority to inspect, require effective stormwater pollutant control, and escalate enforcement to achieve expedient compliance at commercial and industrial sites within their jurisdiction.	NA	Update legal authority, as needed.	CII	--	--	--	--	--	--
C.4.b. Inspection Plan	Permittees shall develop and implement an inspection plan that will serve as a prioritized inspection work plan.	N/A	Each year submit required Business Inspection Plan (BIP) information with annual report.	CII	Recommend reviewing your agency's Business Inspection Plan (BIP) and Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

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C.4.c. Enforcement Response Plan (ERP)	Permittees shall develop and implement an ERP that will serve as a reference document for inspection staff to take consistent actions to achieve timely and effective compliance from all commercial and industrial site operators.	N/A	Continue to implement the ERP.	CII	Recommend reviewing your agency's Business Inspection Plan (BIP) and Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.4.c.ii(4) Record-keeping and C.4.c.iii Reporting	Permittees shall maintain adequate records to demonstrate compliance including maintenance of an electronic database or equivalent tabular system that contains information listed in MRP. In addition, MRP lists specific inspection information for inclusion in the Annual Report.	N/A	Continue to implement the MRP-required recordkeeping.	CII	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.	Applicable agencies should review CEH quarterly inspection report on flowstobay.org.
C.4.d Staff Training	Permittees shall provide annually inspectors with focused training. Training may be Program-wide, Region-wide, or Permittee-specific.	Implement agreed upon training using one of the options allowed by the MRP.	Continue to conduct annual inspector training.	CII	Train staff using Program materials.	Program: Provided training on April 17. Agency: Have staff attend training.	Train staff using Program materials.	Train staff using Program materials.	Train staff using Program materials.	Train staff using Program materials.	Train staff using Program materials.
C.5.a. Legal Authority	Permittees shall have the legal authority to prohibit and control illicit discharges and escalate stricter enforcement to achieve expedient compliance.	N/A	Update legal authority, as needed	CII	--	--	--	--	--	--	--
C.5.b. Enforcement Response Plan (ERP)	Permittees shall develop and implement an ERP that will serve as guidance for inspection staff to take consistent actions to achieve timely and effective abatement of illicit discharges.	N/A	Continue to implement the ERP.	CII	Recommend reviewing your agency's Enforcement Response Plan (ERP) if you have not done this recently.	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.5.c. Spill & Dumping Response, Complaint Response, & Inspection Frequency	Permittees shall have a central contact point including a phone number for complaints and spill reporting, and publicize this number to both internal Permittee staff and the public.	N/A	Continue to maintain a central contact point including phone number for complaints and spill reporting. Continue to publicize this number to Permittee staff and the public.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.5.c. Spill & Dumping Response, Complaint Response, & Inspection Frequency	Develop a spill/dumping response flow chart and phone tree or contact list for internal use that shows the various responsible agencies and their contacts, including who would be involved in illicit discharge incident response that goes beyond the Permittees immediate capabilities.	N/A	Municipalities that have not already done so, will adapt the template or example for their use.	CII	--	--	--	--	--	--	--
C.5.d.ii(1)(a) Control of Mobile Sources	Develop and implement minimum standards and BMPs to be required for each of the various types of mobile businesses.	N/A	Continue to implement the minimum agreed to standards and BMPs.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.5.d.ii(1)(b) Control of Mobile Sources	Develop and implement an enforcement strategy that specifically addresses the unique characteristics of mobile businesses.	N/A	Continue to implement enforcement strategy.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.5.e. Collection System Screening - MS4 Map Availability	Permittees shall develop and implement a screening program using guidance referenced in the MRP. Permittees shall implement screening program by conducting a survey of strategic collection system check points.	N/A	Continue to implement a screening program by surveying strategic collection system check points.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.5.f. Tracking and Case Follow-up	Create and maintain a water quality spill and discharge complaint tracking and follow-up in an electronic database or equivalent tabular system.	N/A	Continue to implement the agreed upon tracking spreadsheet.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.6.b. Enforcement Response Plan (ERP)	Develop and implement an Enforcement Response Plan (ERP) that ensures effective site management by operators.	N/A	Continue to use your agency's ERP.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.6.c. Best Management Practice Categories	Require all construction sites to have seasonally appropriate effective BMPs in 6 categories: erosion control, run-on and runoff control, sediment control, active treatment systems (as necessary), good site management, and non-stormwater management.	Update the checklist as needed.	Continue to use the construction site inspection checklist to conduct the required inspections.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.6.c. Best Management Practice Categories	Require all construction sites to have seasonally appropriate effective BMPs in 6 categories: erosion control, run-on and runoff control, sediment control, active treatment systems (as necessary), good site management, and non-stormwater management.	N/A	Distribute the BMP plan sheet to project applicants.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.6.d. Plan Approval Process	Review erosion control plans for consistency with local minimum required management practices. [No implementation date in permit. Assume 12/1/09 effective date.]	N/A	Continue to review erosion control plans for consistency with local requirements.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items					
					2014				2015	
					Jan - Mar	Apr - Jun	Jul - Sep	Oct - Dec	Jan - Mar	Apr - Jun
C.6.e. Inspections	ii. (1) By September 1 of each year, each permittee shall remind all sites disturbing 1 acre or more of soil to prepare for wet season.	Provide model letter/email to agencies.	Adapt model letter for local use and send to developers/owners of sites disturbing 1 acre or more of land.	New Dev	--	--	Municipalities should send pre-wet season notifications to any active construction sites before September 1.	--	--	--
C.6.e. Inspections	(2) Inspect all sites disturbing 1 acre or more of land and high priority sites monthly during wet season. (3) Inspections shall focus on adequacy and effectiveness of BMPs and shall include assessment of compliance with Permittee's ordinances and permit, assessment of adequacy of BMPs (six categories), visual observation, and education on stormwater pollution prevention as needed. (4) Tracking. Develop construction site inspection database or equivalent tabular format.	N/A	Continue to use tracking spreadsheet.	New Dev	Ongoing	Ongoing	--	Ongoing	Ongoing	Ongoing
C.6.f. Staff Training	Provide training or access to training for staff conducting construction stormwater inspections.	Provide training workshop for construction site inspectors on new MRP requirements.	Send staff to training.	New Dev	Construction Site Inspection Workshop set for April 23rd.	Construction Site Inspection Workshop on April 23rd.	--	--	--	Construction Site Inspection Workshop on May 5th.
C.7.a. Storm Drain Inlet Marking	Permittees shall mark and maintain at least 80% of municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message. At least 80% of municipally-maintained storm drain inlets must be inspected and maintained at least once per five-year permit term.	N/A	Continue to make sure that at least 80% of municipally-maintained inlets with a no dumping message or equivalent. Inspect and maintain at least 80% of municipally-maintained inlets to ensure that they are legibly labeled once per permit term. Keep track of annual percentages of municipally-maintained inlet markings inspected and maintained as legible, and report prior years' annual percentages in the 2013 Annual Report.	MM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.a.i Storm Drain Inlet Marking	For newly approved, privately-maintained streets, permittees must require inlet marking and maintenance, and verify marking prior to accepting the project.	NA	Continue to require builders to mark inlets on newly approved, privately-maintained streets. Require maintenance of markings by entity responsible for maintaining streets. Verify that newly developed streets are marked prior to acceptance of the project. Keep track of annual number of projects accepted after inlet markings were verified, and report prior years' annual number of projects in the 2013 Annual Report.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.d. Stormwater Point of Contact	Permittees shall individually or collectively create and maintain a point of contact to provide the public with information on watershed characteristics and stormwater pollution prevention alternatives.	N/A	Continue to identify a central contact point including phone number for information on stormwater issues. Continue to publicize this number to Permittee staff and the public.	PIP & CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.e.i, ii Public Outreach Events	Participate in and/or host events such as fairs, shows, workshops, to reach a broad spectrum of the community with stormwater runoff pollution prevention messages, including messages that encourage residents to (1) wash cars at commercial car washing facilities (2) use minimal detergent when washing cars, and (3) divert car washing runoff to landscaped area.	Continue implementation of the OWOW Campaign, which includes tabling events. Continue Program involvement in Home and Garden Shows. Develop and distribute car wash information to agencies.	Continue to provide stormwater runoff pollution prevention messages annually at local events according to population: <10K = 2 events 10,001 - 40K = 3 events 40,001 - 100K = 4 events 100,001 - 175K = 5 events 175,001 - 250K = 6 events >250K = 8 events Help develop and distribute car wash information.	PIP	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.e.iii. Public Outreach Events	In each Annual Report, each Permittee shall list the events (name, location and date) participated in and assess the effectiveness of efforts with appropriate measures (e.g., success at reaching a broad spectrum of the community, number of participants compared to previous years, post-event survey results, quantity/volume of materials cleaned up and comparisons to previous efforts).	Report on and provide effectiveness assessments of OWOW tabling events, event partnerships, Alameda County Fair and other countywide events.	Report on and assess the effectiveness of local events.	PIP	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items					
					2014				2015	
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C.7.f. Watershed Stewardship Collaborative Efforts	Permittees shall individually or collectively encourage and support watershed stewardship collaborative efforts or community groups and other organizations that benefit the health of the watershed. Report on level of involvement and provide an assessment of effectiveness in each Annual Report.	Report on level of involvement and provide effectiveness assessments.	Continue to fund local "friends of creek" groups if possible. Describe involvement and effectiveness in Annual Reports.	PIP, WAM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.g. Citizen Involvement Events	Permittees shall individually or collectively support citizen involvement events which provide the opportunity for citizens to directly participate in water quality and aquatic habitat improvement, such as creek/bay cleanups, volunteer monitoring, storm drain inlet marking, community grants, etc.	Report on citizen involvement events funded & assess effectiveness.	Continue to sponsor and/or host citizen involvement events annually according to population: <10K = 1 event 10,001 - 40K = 1 event 40,001 - 100K = 2 events 100,001 - 175K = 3 events 175,001 - 250K = 4 events >250K = 5 events. Report on citizen involvement events and provide effectiveness assessments of those events.	PIP	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.h. School-Age Children Outreach	Permittees shall individually or collectively implement outreach activities designed to increase awareness or stormwater and/or watershed message(s) in school-age children (K through 12).	Report on and provide effectiveness assessments of the educational services programs funded.	Continue conducting school outreach activities. Report on and provide effectiveness assessments of those outreach activities.	PIP	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.7.i. Outreach to Municipal Officials	Permittees shall conduct outreach to municipal officials such as through the use of the Nonpoint Education for Municipal Officials program (NEMO) to significantly increase overall awareness of stormwater and/or watershed message(s) among regional municipal officials at least once per permit cycle.	N/A	Continue to provide stormwater and/or watershed educational information to municipal officials at least once per permit cycle. Report outreach conducted in 2013 Annual Report.	PIP	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.9.a IPM Policy	Adopt and IPM policy or ordinance. Include in Annual Report	NA	Be able to confirm policy/ordinance is in place or adopt. Submit in annual report	Parks Maint. & IPM	--	--	--	--	--	--
C.9.b.i IPM Policy	Implement IPM policy or ordinance: The Permittees shall establish written procedures.	NA	Continue to implement establish written standard operating procedures (SOPs).	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.9.b.ii Pesticides	Permittees shall retain records of IPM SOPs.	NA	Continue to maintain records	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.9.b.iii Pesticides	Report on implementation of IPM policy.	NA	Report in each Annual Report	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--	--	--
C.9.c.i Pesticides	Permittees shall ensure municipal employees are trained in IPM.	NA	Continue to encourage employees to attend IPM training	Parks Maint. & IPM	Program: Provide landscape IPM training on March 12. Agencies: Have staff attend.	Ongoing	Ongoing	Ongoing	Program: Provide landscape IPM training on March 11. Agencies: Have staff attend.	Ongoing
C.9.c.ii Pesticides	Report on IPM training	NA	Continue to report on percentage of employees trained and training materials.	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--	--	--
C.9.d.i Contractor IPM	Require contractors to implement IPM	NA	Continue to hire certified contractors	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.9.d.ii Pesticides	Document contractor compliance	NA	Continue to document in AR	Parks Maint. & IPM	--	--	Report in Annual Reports due September 15.	--	--	--
C.9.f.i Pesticides	Interface with Co. Ag. Commissioners	Maintain regular contact	Continue to inform Co. Ag. of any pesticide violations	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.9.f.ii Pesticides	Interface with Co. Ag. Commissioners	Include question in reporting template	Continue to submit summary of any improper pesticide usage reported to Co. Ag.	Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.10.a.ii. Trash: Short term reductions	Submit baseline estimate of trash loading rate from each population based permittee.	N/A	Complete and submit Plan using template	Trash	--	--	--	--	--	--
C.10.a.ii. Trash: Short term reductions	Propose exclusion areas	N/A	Optional: Propose areas for exclusion	Trash	--	--	--	--	--	--

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items					
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C.10.a.ii. Trash: Short term reductions	Propose exclusion areas	N/A	Permittee shall collect and submit an additional year of documentation to support exclusion. Required only if Permittee proposed exclusion areas that are commercial, industrial, or high-density residential.	Trash	--	--	--	--	--	--
C.10.a.ii. Trash: Short term reductions	Progress Report	N/A	Each Permittee shall submit a progress report indicating individual or collective determination of baseline trash.	Trash	--	--	--	--	--	--
C.10.a.iii.	Full Capture Installation	N/A	Install all required full capture devices.	Trash	Ongoing	Installations by July 1, 2014 required to achieve acreage treated requirement.	--	--	--	--
C.10.b.i. Trash Hot Spots	Hot Spot Cleanup and Assessment: This task included both cleanup (C.10.b.i.) and Assessment (C.10.b.iii).	N/A	Complete annual cleanup and assessment of hotspots	Trash	Ongoing	Ongoing	Submit draft results to EOA. Submit final results in Annual Report.	Ongoing	Ongoing	Ongoing
C.10.c. Trash: Long Term Load Reduction	Long Term Trash Load Reduction	N/A	Develop and submit Long Term Trash Load Reduction Plan	Trash	Long-term trash control plans were submitted on behalf of the permittees on Feb 1st.	--	--	--	--	--
C.10.d. Trash Reporting	Reporting on Trash Load Reduction	N/A	Provide summary of trash load reduction actions in each AR	Trash	--	--	Report on progress towards 40% reduction goal in Annual Report.	--	--	--
C.11.a Mercury	Mercury Collection and Recycling	Provide guidance on estimating mass of mercury collected	Report on efforts to promote, facilitate and/or participate in collection and recycling and provide annual estimate of mass of mercury collected	WAM	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.	Addressed by SMCWPPP in Annual Report.
C.12.a.ii PCBs	Incorporate PCBs and PCB-containing equipment in industrial inspections	Provide reminders/guidance at subcommittee meetings	Document incidents where PCBs or PCB-containing equipment is identified and refer to appropriate agencies	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a Manage waste generated from cleaning and treating of copper architectural features	ii. (1) The Permittees shall develop BMPs on how to manage the waste during and post-construction. (2) The Permittees shall require use of appropriate BMPs when issuing building permits. (3) The Permittees shall educate installers and operators on appropriate BMPs. (4) The Permittees shall enforce against noncompliance. Report on implementation in 2012 Annual Report.	Prepare flyer on BMPs for installation and maintenance of architectural copper	Require the use of appropriate BMPs when issuing building permits, provide information on the BMPs to installers and operators, and enforce against noncompliance.	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a.i Copper	Architectural Copper - legal authority to prohibit discharge of wastewater to storm drains from related activities	N/A	If your agency did not certify legal adequacy in September 2011, address this in 2012 Annual Report	New Dev	--	--	--	--	--	--
C.13.a.ii(2) Copper	Architectural Copper - require use of appropriate BMPs	Coordinate with BASMAA to include question in 2012 Annual Report form	Report on incorporation in building permit process	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a Manage waste generated from cleaning and treating of copper architectural features	iii. In their 2013 Annual Report, the Permittees shall evaluate the effectiveness of these measures, including BMP implementation and propose any additional measures to address this source.	Update deliverable forms for 2012/13 to assist with new reporting requirement.	Report on BMP effectiveness (annual reports submitted September 15, 2013.)	New Dev	--	--	--	--	--	--
C.13.a.ii(3) Copper	Architectural Copper - educate installers and operators	Present the new BMPs in construction workshop	Report on education, municipal staff participation in trainings	New Dev	Include in Construction Site Inspection Workshop on April 23rd.	--	--	Program: compiled a list of Architectural Copper Vendors in the county for outreach efforts.	Emailed and Mailed Copper BMP information to a list of over 40 Architectural Copper Vendors operating in San Mateo County.	--
C.13.a.ii(3) Copper	Architectural Copper - enforcement	N/A	Implement enforcement procedures against noncompliance, report on efforts	New Dev	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.13.a.iii(3) Copper	Architectural Copper - evaluate effectiveness	Evaluate implementation and propose any additional measures	Provide input/feedback	New Dev	--	--	--	--	--	--

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Subcommittee	Quarterly Check-ins for Permit Compliance and Related Items					
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C.13.b.ii Copper	Pools, Spas, Fountains - require sanitary sewer connection or diversion to landscape	N/A	Incorporate in building permit process as appropriate	New Dev	--	--	--	--	--	--
C.13.b.iii Copper	Pools, Spas, Fountains - legal authority to prohibit discharge of copper-containing chemicals	N/A	Certify adequate legal authority, or provide justification & schedule for up to 1 additional year to comply	New Dev	--	--	--	--	--	--
C.13.d.ii(1) Copper	Industrial Sources - inspection program plan	Provide guidance on facility types	Include facilities likely to use copper or have copper sources	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.13.d.ii(2,3) Copper	Industrial Sources - inspectors	Provide training and/or materials	Continue to educate inspectors, ensure appropriate BMPs	CII	Train staff using Program materials.	Program: Provide training. Agency: Have staff attend training.	Train staff using Program materials.	Train staff using Program materials.	Train staff using Program materials.	Train staff using Program materials.
C.13.d.iii Copper	Industrial Sources - Reporting	N/A	Highlight copper reduction results from C.4 section of Annual Report in C.13 section	CII	--	--	Submit results in Annual Report	--	--	--
C.15.a. Exempted Non-Stormwater Discharges	In carrying out Discharge Prohibition A.1, certain unpolluted discharges listed in the permit are exempted from the prohibition against non-stormwater discharges.	N/A	Permittees need to determine whether listed discharges should be handled as exempted or conditionally exempted with approval of Water Board.	CII	--	--	--	--	--	--
C.15.b Conditionally Exempted Non-Stormwater Discharges	v.(1) The Permittees shall require that new or rebuilt swimming pools, hot tubs, spas and fountains within their jurisdictions have a connection to the sanitary sewer to facilitate draining events. The Permittees shall coordinate with local sanitary sewer agencies to determine the standards and requirements necessary for the installation of a sanitary sewer discharge location to allow draining events to occur with the proper permits from the local sanitary sewer agency. [No implementation date in permit. Assume this is timed to coincide with new 5/1/2010 Source Control Requirements in Task.C.3-12]	Through the New Development Subcommittee, advise agencies of the need to coordinate with local sanitary sewer authority.	Coordinate with local sanitary sewer agencies to determine standards and requirement that may need to be included in the agency's Source Control Measures List.	New Dev	--	--	--	--	--	--
C.15.b.i(1) Conditionally Exempted Non-Stormwater Discharges	<u>Pumped Groundwater from Non Drinking Water Aquifers</u> - Groundwater pumped from monitoring wells, used for groundwater basin management, which are owned and/or operated by the Permittees who pump groundwater as drinking water.	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.15.b.i(2) Conditionally Exempted Non-Stormwater Discharges	<u>Pumped Groundwater, Foundation Drains, and Water from Craw Space Pumps and Footing Drains</u> that are new discharges need to meet requirements listed in this portion of the MRP. This includes reporting to Water Board new, potentially contaminated groundwater with flows of 10,000 gpd or more. The MRP specifies certain monitoring requirements and use of specified BMPs.	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.15.b.iii Conditionally Exempted Non-Stormwater Discharges	<u>Planned, Unplanned, and Emergency Discharges of the Potable Water System</u> - The MRP lists prescriptive requirements for use of BMPs, notifications, monitoring, and reporting	N/A	Permittees who have these types of discharges need to continue complying with the monitoring, BMPs, and reporting requirements listed in this section of the MRP.	CII	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required. Program: Provide guidance on completing a NOI or NONA for the State General Drinking Water System Permit by September 2015.	Collect required discharge monitoring data for each planned potable water discharge. Review the collected data. If benchmark values are exceeded determine if the values are valid and/or if further staff training is required. Program: Provide guidance on completing a NOI or NONA for the State General Drinking Water System Permit by September 2015.
C.15.b.v Conditionally Exempted Non-Stormwater Discharges	<u>Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges</u> - Prohibit the discharge of water that contains chlorine residual, copper algacide, filter backwash or other pollutants. Direct water to sanitary sewer or landscaped areas that can accommodate the volume. Discharges to storm drains only if discharge is properly dechlorinated and there are not other feasible disposal alternatives.	N/A	Permittees who have these types of discharges need to continue requiring that new or rebuilt pools, etc. connect to the sanitary sewer. Continue to improve public outreach and educational efforts regarding the required BMPs, and implement ERPs for polluted discharges.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.15.b.vi Conditionally Exempted Non-Stormwater Discharges	<u>Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering</u> - promote measures that minimize runoff and pollutant loading from excess irrigation including working with potable water purveyors.	N/A	Permittees will need to continue promoting water conservation, less toxic methods of pest controls, use of drought tolerant vegetation, and appropriate application of water for irrigation as specified in the MRP.	CII, Parks Maint. & IPM	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
C.15.b.vii Conditionally Exempted Non-Stormwater Discharges	<u>Additional Discharge Types</u> - Permittees shall identify and describe additional types and categories of discharges not yet listed in Provision C.15.b that they propose to conditionally exempt from Prohibition A.1 in periodic submissions to the Executive Officer.	Identify priority types of additional discharges to request	Assist with identifying and reviewing list of additional priority discharge types.	CII	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing

Note: this document should not be substituted for MRP

MRP Compliance Quarterly Check-in for SMCWPPP Municipalities

MRP Provision	MRP Requirement	Countywide Program	Member Agencies	Lead Sub-committee	Quarterly Check-ins for Permit Compliance and Related Items					
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C.16.a Annual Reports	Submit Annual Reports	Submit Annual Report on General Program Activities	Submit Annual Report on previous fiscal year activities	TAC	--	--	Submit draft agency Annual Reports to EOA for review. Agency and SMCWPPP Annual Reports to be submitted to Regional Water Board by September 15.	--	--	--

C/CAG AGENDA REPORT

Date: April 21, 2015
Item: 4D
From: Matthew Fabry, Program Coordinator
Subject: State/Regional Stormwater Issues & Regulations Update

(For further information or questions contact Matthew Fabry at 650 599-1419)

RECOMMENDATION

Staff will provide an update on state and regional stormwater-related issues and regulations.

ATTACHMENTS

1. State & Regional Stormwater Issues and Regulatory Tracking Table

C/CAG AGENDA REPORT

Date: April 21, 2015
Item: 4E
From: Matthew Fabry, Program Coordinator
Subject: Other Issues/Subcommittee Updates

(For further information or questions contact Matthew Fabry at 650 599-1419)

RECOMMENDATION

Staff will provide verbal updates on any other relevant issues, along with the attached written materials.

ATTACHMENTS

1. Upcoming Meetings Summary
2. Recent Subcommittee Meeting Minutes

Upcoming Meetings, Work Shops, Trainings, etc. for Each Countywide Program Component

MEETINGS

- Stormwater Committee – meets at 2:30 pm, third Thursday of the month, as needed. Next meeting is scheduled for May 21, San Mateo County Transit District Office, City of San Carlos.
- Technical Advisory Committee – meets 10 am to noon, third Tuesday of the month, quarterly. Next meeting is July 21, City of San Mateo Main Library.
- New Development – subcommittee meets 1:30 to 3:30 pm, second Tuesday of the month, quarterly. Next meeting is May 12, at the Redwood Shores Library in Redwood City.
- Public Information/Participation – subcommittee meets 10:00 am to noon, second Tuesday of the month, quarterly. Next meeting is May 12 at Belmont City Hall, 2nd floor EOC.
- Municipal Maintenance – subcommittee meets noon to 1:00 pm (\$10.00 lunch), fourth Wednesday of the month, quarterly. The next meeting is August 26 at Redwood Shores Library, Redwood City.
- Parks Maintenance and Integrated Pest Management – work group meets 1:30 to 3:00 pm, fourth Tuesday of the month, three times per year. Next meeting is April 28 at the City of Redwood City's Community Activities Building.
- Trash – subcommittee meets as needed. Next meeting is TBD.
- Litter – work group meets as needed. Next meeting is on May 4 at 1pm at the San Mateo County Environmental Health offices in San Mateo.
- Commercial/Industrial/Illicit Discharge Control – subcommittee meets 1:00 to 2:30 pm, third Wednesday of the month, quarterly. Next meeting is June 17 at San Mateo County Environmental Health, City of San Mateo.
- Watershed Assessment and Monitoring – subcommittee meets 10:00 am to noon, second Thursday of the month, approximately two times per year. Next meeting is tentatively scheduled for June 11, 2015 at San Mateo County Environmental Health, City of San Mateo.

WORKSHOPS

- Annual Construction/C.3 Inspection Workshop – May 5, City of San Mateo Public Library
- Annual New Development Workshop – Tentatively scheduled for June 17, 2015
- Litter Roundtable No. 2 – Tentatively scheduled for June 24, 2015
- Corporation Yard Stormwater BMP Training – April 23, Redwood City Corp Yard, April 29, South San Francisco Corp Yard or April 30, City of San Mateo Corp Yard

DRAFT CII Subcommittee Report

Meeting Date: March 18, 2015

Subcommittee Actions:

- Agreed that the December 2014 subcommittee meeting summary was acceptable.

Requested Action or Feedback/Guidance (if any): None.

Other Information/Announcements:

- **Update on County Environmental Health (CEH) Inspections.** The CEH Stormwater Inspection data are available on SMCWPPP's flowstobay.org website under Annual Report Guidance. CEH has changed how inspection data are shared with the cities. On the Annual Report Guidance page there is a list of the individual cities. When you click on a city name you are directed to a OneDrive folder. This folder contains an Excel workbook with a tab containing all of the inspection data and a summary tab for annual reporting. The folder also contains one or two files with the pdf inspection reports. The Excel spreadsheets and pdf files will be periodically updated with the current CEH inspection report data. CEH is also pilot testing paperless inspection forms in the field. A request was made to have Patrick Ledesma give a presentation on the field equipment and database at the next Subcommittee meeting.
- **MRP 2.0.** The group reviewed the proposed changes in the Administrative Draft Permit Provisions C.4, C.5, C.13 and C.15 and the BASMAA comments provided at the February 24, 2015 meeting with Regional Water Board staff. There was further discussion surrounding the Mobile Business Control Program Provision and how difficult it is to develop an inventory of mobile businesses and possible target groups for outreach.
- **SMCWPPP Facility Stormwater Inspection Form Template.** The Subcommittee received the revised SMCWPPP Facility Stormwater Inspection Form Template by email for comment. The Subcommittee agreed that the form could be posted to the flowstobay.org website. There will be two versions posted. The version reviewed will be posted as the SMCWPPP Template. The other version will contain the checkboxes from the CEH Inspection Form.
- **CII Training Workgroup.** Kristin emailed the Subcommittee an updated Draft *How to Conduct Stormwater Inspections* that was originally an excerpt from the 1998 *Handbook for Facility and Illicit Discharge Inspectors*. There were no comments on the Draft. The Subcommittee agreed that it should be finalized after another short review period and added to the SMCWPPP Orientation Training Manual and CII Subcommittee webpage. Kiley Kinnon pointed out there are stormwater inspector training materials available on the State Water Board website and the Caltrans website.
- **CASQA Portal Subscription.** Kristin surveyed the Subcommittee to see who was interested in obtaining a group subscription to the CASQA Industrial and Commercial BMP Handbook

portal. Only 5 cities responded with 4 expressing interest in a group subscription. Kristin will review options for SMCWPPP purchasing a group subscription.

- **Mobile Business Outreach.** The Subcommittee approved the outreach message to mobile businesses and is interested in future collaboration with the PIP Subcommittee, through Kathryn Cooke, for more outreach opportunities. The outreach message will go out through social media in April. Kathryn offered to make a collage of pictures to go out with the mobile business BMP message. Kristin will send an email to Subcommittee members requesting any relevant pictures. Even a staged picture of BMPs at a storm drain inlet would be helpful.

Subcommittee Work That Affects Other Subcommittees: None.

Next Steps:

- Have an agenda item at the next Subcommittee meeting for Patrick to demonstrate the CEH electronic inspection form system.
- Kristin will email the Subcommittee for pictures related to the mobile business BMP outreach message.
- Kristin will investigate options for the 4 cities interested in purchasing a subscription to the new CASQA Industrial/Commercial BMP Handbook portal.
- Kristin will finalize the *How to Conduct Stormwater Inspections* guidance document.

Next Meeting Date: The Subcommittee is scheduled to meet next on Wednesday June 17, 2015 at 1:00 pm.

DRAFT SUMMARY

Municipal Maintenance Subcommittee Meeting – Redwood City Library Room A&B

Meeting Date: March 25, 2015

Subcommittee Actions:

1. Agreed that the summary of the January 2015 subcommittee meeting was acceptable.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None

Other Information/Announcements:

- **Open Forum Discussion on Maintenance Issues.** Pacifica has installed 100 more connector pipe screen full trash capture devices. Their previous devices were from Kristar. Kristar was bought out by Oldcastle. The new devices were purchased from Oldcastle. Some of the new devices have failed. Pacifica’s experience is the corner units and rounded screens work fine but the flat screens fail easily during storm events. Redwood City shared some drain inlet protection products that work well for them. They are manufactured by ERTEC (<http://ertecsystems.com/Products/Top-Guard---Drain-Inlet-Protection>). The below photos are examples of ERTEC products.



- **MRP 2.0.** The Regional Water Board released an Administrative Draft MRP 2.0. BASMAA representatives met with Regional Water Board staff to discuss the MRP 2.0 Provisions and provided comments to Board staff. Provision C.2 was not discussed and there were no comments sent to the Regional Water Board staff by BASMAA. There are three changes in MRP 2.0 Provision C.2 compared to MRP 1.0:
 - **C.2.b. Sidewalk/Plaza Maintenance and Pavement Washing.** The following underlined text was added to the task description: “The Permittees shall implement and require to be implemented BMPs that prohibit the discharge of polluted wash water and non-stormwater to storm drains for pavement washing, mobile cleaning, pressure wash operations....”
 - **C.2.d. Stormwater Pump Stations.** The specific requirements for minimum DO sampling and inspections at pump stations and Annual Reporting requirements were removed. However, Permittees still need to implement corrective actions to maintain DO

concentrations above 3 mg/L, ensure pump stations are free from debris and trash, and maintain records of inspection, maintenance, and corrective actions.

- **C.2.f. Corporation Yard BMP Implementation.** The current MRP requires a minimum of one inspection before the start of the rainy season. The draft provision now specifies this inspection must occur between September 1st and September 30th.

There will be another opportunity to comment when the Regional Water Board release the Draft Permit (or Tentative Order) for public comment.

- **Training.** There is no budget for a workshop in the FY14-15 budget. However, a suggestion was made at the last meeting to conduct Corp Yard BMP and inspection training by organizing corp yard visits. South San Francisco, Redwood City and City of San Mateo have all volunteered their corp yards for training. Kristin will send out a Registration form. Maintenance staff should select and attend a single date/corporation yard. The groups will meet at the corp yards and spend an hour walking through the yards and discussing BMPs. The field visits will occur in April. A confirmation email will include a link to watch a San Diego County video on proper housekeeping BMPs. The video was shown at the Subcommittee meeting.

There are other Municipal Maintenance BMP training videos the Subcommittee did not get a chance to watch. Kristin will post them on the members only section of SMCWPPP's flowstobay.org website. She will send an email to the Subcommittee with the links and a survey. The survey will ask if the videos are useful, if members will use them on their own for training, or if SMCWPPP should host a special meeting and show the training videos.

Subcommittee Work that Affects Other Subcommittees: None

Next Steps: Kristin will send out a Registration form for the Corporation Yard BMP training. Kristin will email a survey and links to the training videos available.

Next Meeting: The next meeting will be held on August 26, 2015.

SMCWPPP Litter Work Group Draft Meeting Summary Meeting Held on Monday, March 30, 2015

1. Peter Schultze-Allen from EOA/SMCWPPP welcomed the group and thanked them for coming. In attendance were: Barbara Bernardini and Susan Kennedy from South San Francisco Scavenger Company; Lillian Clark and Julie Casagrande from the San Mateo County Department of Public Works; Julia Au from the San Mateo County Department of Environmental Health; and Sarah Scheidt from the City of San Mateo.
2. Peter gave the group a recap of the issues and goals discussed at the last meeting.
3. The attendees updated the group on recent activities in their jurisdictions.
 - a. Lillian discussed the planned revisions to County's municipal code related to litter in the unincorporated areas that will require commercial property owners to remove litter from their frontages including sidewalk & gutter areas of the public right of way. They are also moving forward with the "See, Click, Fix" application for various uses with the public, haulers, SFPUC and Caltrans. South SF is also using it.
 - b. Julia described EH's current programs related to litter including their cigarette butt campaign and pilot project, clean up days and work with the PIP subcommittee.
 - c. Sarah is working on a Litter Ambassador program. It's modeled after a 25 year program in Philadelphia and has aspects like the neighborhood watch programs.
4. Peter gave an update on what the ZLI group is doing in Santa Clara County regarding the Right Size Right Service campaigns. Several cities are doing pilot campaigns with either a downtown section of their jurisdiction, or a particular trash management area, or with prioritized customers (for example pulled from a service overage database.) Sample outreach materials were handed out.
5. The group discussed the following subjects related to the next Roundtable Event in June:
 - a. The concept for the event is for each municipality to send staff from their solid waste, stormwater and management divisions and leave the event with a draft framework.
 - b. Hauling companies will send staff with resources to allow the municipalities to complete the basic framework on a Right Size – Right Service campaign in their jurisdiction.
 - c. Peter passed around a draft document with steps for the creation of the framework that could be used at the event – the group requested some clarification of terms.
 - d. Coordination with other C-CAG/SMCWPPP committees as related to trash/litter.
6. Action Items for the next meeting:
 - EOA will contact the hauling company representatives and discuss the items needed for the Roundtable workshop.
 - EOA will work with the other SMCWPPP committees to report on the progress that the Litter Work Group is making and get buy-in on sending management level staff to the Roundtable.
 - EOA will send out a "Save the Date" email for the Roundtable event.
 - The Work Group will meet again on May 4th at 1pm.