

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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STORMWATER (NPDES) COMMITTEE AGENDA 2:30 PM, Thursday, October 15, 2020

On March 17, 2020, the Governor issued Executive Order N-29-20 suspending certain provisions of the Ralph M. Brown Act in order to allow for local legislative bodies to conduct their meetings telephonically or by other electronic means. Pursuant to the Shelter-in-Place Orders issued by the San Mateo County Health Officer and the Governor, and the CDC's social distancing guidelines, which discourage large public gatherings, C/CAG meetings will be conducted via remote conferencing. Members of the public may observe or participate in the meeting remotely via one of the options below.

Join by Zoom: <https://us02web.zoom.us/j/88364736196?pwd=ZHZvMEtyWDRKajk5SHY3WTRvTkxkQT09>

Join by Phone: +1 669 900 6833

Meeting ID: 883 6473 6196

Password: 093624

Persons who wish to address the C/CAG Board on an item to be considered at this meeting, or on items not on this agenda, are asked to submit written comments to rbogert@smcgov.org. Oral public comments will also be accepted during the meeting through Zoom. Please see instructions for written and spoken public comments at the end of this agenda.

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|---|----------------|----------------------|
| 1. Public comment on items not on the Agenda (presentations limited to three minutes). | Breault | No materials |
| 2. Stormwater Issues from Sept C/CAG Board meeting: <ul style="list-style-type: none">• Lisa Peterson, representing the City of Pacifica, appointed to the Stormwater Committee | Fabry | No materials |
| 3. ACTION – Review and approve August 20, 2020 Stormwater Committee minutes | Fabry | Pages 1-6 |
| 4. INFORMATION – Announcements on stormwater issues <ul style="list-style-type: none">• Funding opportunities• Annual Report submittals• Regional Projects update• Other | Fabry | Verbal, no materials |
| 5. INFORMATION – Receive presentation on California Stormwater Quality Association 2020 program updates | Geoff Brosseau | Page 7 |
| 6. INFORMATION – Receive a presentation on “How Healthy is the Bay?” An Update from the Regional Monitoring Program for Water Quality in San Francisco Bay | Jay Davis | Page 8 |
| 7. INFORMATION – Receive update on the Municipal Regional Permit reissuance process and Regional Water Board response letter regarding Green Infrastructure Plans | Fabry | Pages 9-38 |
| 8. INFORMATION – Receive update on developing the Draft Countywide Sustainable Streets Master Plan | Bogert | Page 39 |
| 9. Regional Board Report | Mumley | No Materials |
| 10. Executive Director’s Report | Wong | No Materials |
| 11. Member Reports | All | No Materials |

Adjourn

PUBLIC NOTICING: All notices of C/CAG regular Board meetings, standing committee meetings, and special meetings will be posted at the San Mateo County Transit District Office, 1250 San Carlos Ave., San Carlos, CA, and on C/CAG's website at: <http://www.ccag.ca.gov>.

PUBLIC RECORDS: Public records that relate to any item on the open session agenda for a regular Board meeting, standing committee meeting, or special meeting are available for public inspection. Those public records that are distributed less than 72 hours prior to a regular Board meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members, of the Board. The Board has designated the City/County Association of Governments of San Mateo County (C/CAG), located at 555 County Center, 5th Floor, Redwood City, CA 94063, for the purpose of making public records available for inspection. Such public records are also available on C/CAG's website at: <http://www.ccag.ca.gov>. Please note that C/CAG's office is temporarily closed to the public; please contact Mima Guilles at (650) 599-1406 to arrange for inspection of public records.

PUBLIC PARTICIPATION DURING VIDEOCONFERENCE MEETINGS: Persons with disabilities who require auxiliary aids or services to participate in this meeting should contact Mima Guilles at (650) 599-1406, five working days prior to the meeting date.

Written comments should be emailed in advance of the meeting. Please read the following instructions carefully:

1. Your written comment should be emailed to rbogert@smcgov.org.
2. Your email should include the specific agenda item on which you are commenting or note that your comment concerns an item that is not on the agenda.
3. Members of the public are limited to one comment per agenda item.
4. The length of the emailed comment should be commensurate with the two minutes customarily allowed for verbal comments, which is approximately 250-300 words.
5. If your emailed comment is received at least 2 hours prior to the meeting, it will be provided to the C/CAG Committee members and made publicly available on the C/CAG website along with the agenda. We cannot guarantee that emails received less than 2 hours before the meeting will be able to be posted or provided to Committee members prior to the meeting, but such emails will be included in the administrative record of the meeting.

Oral comments will be accepted during the meeting through Zoom. Please read the following instructions carefully:

1. The Stormwater Committee meeting may be accessed through Zoom at the online location indicated at the top of this agenda.
2. You may download the Zoom client or connect to the meeting using an internet browser. If using your browser, make sure you are using a current, up-to-date browser: Chrome 30+, Firefox 27+, Microsoft Edge 12+, Safari 7+. Certain functionality may be disabled in older browsers including Internet Explorer.
3. You will be asked to enter an email address and name. We request that you identify yourself by your name as this will be visible online and will be used to notify you that it is your turn to speak.
4. When C/CAG Staff or the Committee Chair/Vice-Chair call for the item on which you wish to speak, click on "raise hand." C/CAG staff will activate and unmute speakers in turn. Speakers will be notified shortly before they are called on to speak.
5. When called, please limit your remarks to the time allotted.

If you have any questions about this agenda, please contact C/CAG staff:

Program Manager: Matthew Fabry (mfabry@smcgov.org or 650-599-1419)
Administrative Assistant: Mima Guilles (650) 599-1406

C/CAG AGENDA REPORT

Date: October 15, 2020

To: Stormwater Committee

From: Matthew Fabry, Program Manager

Subject: Review and approve August 20, 2020 Stormwater Committee meeting minutes.

(For further information or questions contact Matthew Fabry at mfabry@smcgov.org)

RECOMMENDATION

That the Committee review and approve August 20, 2020 Stormwater Committee meeting minutes, as drafted.

DISCUSSION

N/A.

ATTACHMENTS

1. Draft August, 2020 Minutes

STORMWATER COMMITTEE
Regular Meeting
Thursday, August 20, 2020
2:30 p.m.

Draft Meeting Minutes

The Stormwater Committee met remotely via Zoom, per C/CAG's shelter-in-place policy and consistent with state and county directives to manage COVID-19. Attendance at the meeting is shown on the attached roster. In addition to the Committee members, also in attendance were Matt Fabry (C/CAG Program Manager), Reid Bogert (C/CAG staff), Sandy Wong (C/CAG Executive Director), Jon Konnan (EOA), Susan Wright, Kim Springer, and Jon Allan (County of San Mateo), Jennifer Lee (City of Burlingame), Natalie Gribben (Town of Hillsborough), Makena Wong (San Mateo County Flood and Sea Level Rise Resiliency District), Doug Silverstein (Thrive Alliance), and Darren Choy (RRM). Vice Chair Ovadia called the meeting to order at 2:30 p.m.

1. Public comment: Doug Silverstein from Thrive Alliance in San Mateo County provided a public comment on a recent research project and special initiative led by the alliance, called "Reduce & Rethink Single-Use Plastics in San Mateo County" to evaluate the challenges of single-use plastics in the County and the full cost accounting of the impact of plastics. Mr. Silverstein mentioned the first phase, which includes a technical report, and invited members of the Committee to join the second phase of the project, which will focus on action and identifying pilot programs to reduce single-use plastics in San Mateo.

2. Stormwater Issues from C/CAG Board Meetings: July/August – None.

3. ACTION – Approval of the draft minutes from the July 16, 2020, Stormwater Committee meeting. Motion: member Machida, second: member Donahue. Approved (12:0:0).

4. INFORMATION – The following items were covered in announcements:

- Funding Opportunities – Matt Fabry noted the San Mateo County Transportation Authority's recently release bike/ped call for projects, and that the Measure W funding includes a core principle for climate resiliency and green infrastructure and projects that include these features will receive additional points in the scoring. Project proposals are due September 21. Fabry also mentioned the Ocean Protection Coastal Resiliency Grant program, which includes eligibility for sea level rise and other climate resiliency projects (like green infrastructure). The deadline for this solicitation is September 14.
- Annual Reporting Process/Schedule – Fabry provided an overview of the Annual Reporting schedule for 2020. Key dates include:
 - Send draft jurisdiction reports to EOA for review - September 2
 - The draft Program Annual Report distributed for permittee review – September 2
 - Final reports submitted to EOA for upload to Water Board FTP site – September 23
- Sustainable Streets Master Plan – Project Concepts – Fabry updated the Committee on developing project concepts. The project team is wrapping up the first four of the ten draft concepts in the next week to send out to the cities for review and has acquired the necessary additional information to develop the remaining draft concepts. Fabry also shared the planned draft and final report schedule for the overall Sustainable Streets Master Plan, which will include

opportunities for the Stormwater Committee to provide input and recommend adoption of the final report by the C/CAG Board of Directors. The initial draft of the report is planned for release to permittees in mid-October, with the final draft and final report brought to the C/CAG Board in November/December or December/January (February if no meeting is held in January). The project must be completed by the end of February.

- MRP 3.0 process and schedule update – Fabry gave an update on the schedule for developing draft language for reissuance of the Municipal Regional Permit (MRP).

5. INFORMATION – Received a presentation on (1) compliance with MRP requirements for PCBs load reduction in San Mateo County stormwater runoff and (2) first draft of Pollutant Control Measures Implementation Plan – Scenarios to Achieve PCBs and Mercury TMDL Wasteload Allocations in San Mateo County Stormwater Runoff.

Matt Fabry introduced a presentation provided by Jon Konnan (EOA) for the San Mateo County Pollutant Control Measures Implementation Plan (Plan) for attaining the PCBs and mercury TMDL wasteload allocations for San Mateo County. Fabry noted the Plan is a culminating report on PCBs and mercury efforts in San Mateo County under the current Municipal Regional Permit (MRP) requirements. It models what additional controls would need to be implemented to achieve the final numeric load reductions stipulated in the TMDLs for PCBs and mercury in San Francisco Bay. Fabry noted the Plan is due with the 2020 Annual Reports, and that Jon’s presentation will address the near-term requirements for compliance under MRP 2.0 as well as the long-term analyses showing different scenarios for achieving wasteload allocations for PCBs and mercury in San Mateo County, as detailed in the Plan.

Konnan first provided an overview of the calculated load reductions for PCBs to-date, as will be reported in the Program Annual Report, including a summary of the various PCBs control measures. Based on regionally compiled calculations for 2020 reporting, the co-permittees under the MRP did achieve the load reduction requirement for the 2020 compliance benchmark of 3,000 g/year by all source control and structural control measures. The region is collectively reporting having achieved an estimated cumulative 3,020 g/year reduction. San Mateo County permittees did not collectively reach the countywide population-based share of the regional load reduction requirement; however, achieving the required load reduction at the regional level means all permittees would be deemed compliant. Notably, the PCBs demolition program, green infrastructure, and source property investigations accounted for significant load reduction credit, both for San Mateo County and for the other countywide programs. Konnan reminded the Committee that San Mateo County has less old industrial land use area relative to other counties under the MRP, which contributes to the challenges faced by San Mateo County permittees in meeting the population-based share of the overall TMDL stormwater load reduction. Konnan did report on multiple source property investigations that have already been referred to the Regional Water Board or are underway in San Carlos, where there are high priority drainage management areas. One site at 1411 Industrial Road that is currently being cleaned up and under referral, could potentially provide a 50 g/year load reduction credit in the future.

Konnan then provided an update on development of the Plan, with a focus on PCBs, given that the efforts to address PCBs are assumed to be sufficient to manage for the wasteload reduction requirements for both PCBs and mercury. The MRP requires the Plan to evaluate all “technically and economically feasible” controls needed to achieve the final wasteload allocations for PCBs and mercury by the TMDL timelines (2030 for PCBs and 2028 for mercury). A major question addressed in the Plan will be whether attaining the PCBs wasteload allocation for San Mateo will be feasible by the TMDL timeline, and the main conclusion from the analysis in the Plan is that it is not feasible. The Plan will

provide different scenarios and timelines (with associated cost estimates) for achieving the TMDL wasteload allocations. Konnan outlined the key steps in calculating the PCBs and mercury load reductions estimated for different timelines:

1. Revised baseline modeling for pollutant loading to the San Francisco Bay (Phase I Reasonable Assurance Analysis or RAA)
2. Estimated load reduction target or wasteload allocation
3. Estimated wasteload reduction from different source controls (with additional PCBs control measures being proposed for MRP 3.0, such as managing PCBs in electric utilities equipment and managing PCBs in infrastructure caulking in bridge sealants during bridge rehabilitation or replacement) for three timeframes (2030, 2040, 2080)
4. Estimated green infrastructure consistent with San Mateo Countywide Phase II RAA for green infrastructure through 2040
5. Evaluate gap in load reduction requirement between TMDL population-based load reduction and projected loads reduced through source controls and green infrastructure
6. Evaluate the additional green infrastructure required to fill the gap in achieving the waste load allocation and associated costs
7. Evaluate the “economic and technical feasibility” of achieving the countywide-apportioned waste load allocation across the three scenarios

The three timeline scenarios and cost estimates for feasibility demonstrate significant future resource burdens for municipalities to achieve jurisdictional wasteload allocations. The analysis determined that enormously high levels of green infrastructure and regional scale stormwater capture projects would be needed to fill the wasteload reduction gap across all time horizons, which would be especially costly for the 2030 and 2040 timelines. There are assumptions with some uncertainty about future new and redevelopment rates to project load reductions associated with regulated projects and associated stormwater controls.

The cost and feasibility analysis of the Plan lays out projected costs from regionally consistent unit cost estimates for different control measures, including estimated future operations and maintenance costs, for the three timeframes (2030, 2040 and 2080). The estimated costs range from \$1.4 billion to \$760 million between the 2030 and 2080 timelines for initial capital costs. The cost analysis further includes the estimated expenditures to-date from various controls, including source controls and public green infrastructure, toward achieving PCBs load reductions in San Mateo County to show the comparative resources investment in controlling PCBs to-date.

Konnan shared the main takeaway from the Plan is that the three scenarios demonstrate infeasibility in achieving TMDL load reduction targets via green infrastructure under the three timelines. The logical next step in the process of assessing feasibility and a path forward in the next permit and beyond would be to make a request to the Regional Water Board for a time extension for the PCBs TMDL based on findings in the Plan. Konnan noted the results from the Plan are generally consistent with the findings among control plans from most other MRP permittees. To make a successful request for a time extension, permittees would need to demonstrate implementation of controls within the current TMDL timeframe to the “maximum extent practicable,” which is an involved dialogue with Regional Water Board staff on whether that effort has been demonstrated.

Finally, Konnan mentioned the additional approaches San Mateo co-permittees are employing with C/CAG’s assistance to seek funding for projects and work more collaboratively to achieve water quality

goals, including identifying new opportunities for regional scale multi-benefit projects, funding pilot projects via C/CAG and other grant funds, and supporting the San Mateo Flood and Sea Level Rise Resiliency District with developing an investment strategy that could help fund green infrastructure.

Konnan shared the planned schedule for review and comment on the drafts of the Plan and finalization for submitting the Plan to the Regional Water Board on September 30, 2020 with the Program and jurisdiction Annual Reports.

Committee members discussed various aspects of the report and raised questions about the long timeline and cost for achieving TMDL compliance and the process for providing input on revisiting the timeline with Water Board staff. Fabry suggested the first step is to provide the evidence for infeasibility under the current timeframe (and even long-term timeframes) via the Plan to initiate a dialogue, recognizing there may be some ongoing discussion to find common ground for negotiation. Fabry also mentioned Water Board members tend to respond positively to well-documented, data driven studies and analyses from permittees; though, making modifications to an existing TMDL is a separate process from permit negotiations and will require additional time and effort. Committee members also discussed the need for having broader conversations with local elected officials for motivating a more achievable approach to implementation based on the findings in the Plan and especially the significant cost implications, to which staff suggested this would be a worthwhile tactic for getting better engagement and institutional support via the annual San Mateo Countywide Program update to the C/CAG Board of Directors. Members also inquired about the basis for cost metrics and whether there is a need for adaptive management under the Plan. Konnan noted that consistent unit costs were used by all of the MRP counties in developing their plans and adaptive management is a built-in aspect of developing the control measure plans and there will be opportunities to update modeling and assumptions under the PCBs TMDL and to reevaluate findings and assumptions in the Plan. Lastly, members discussed the approach to regional coordination among MRP permittees as the programs move from developing control measures plans into later phases of implementation.

6. Regional Board Report: None.

7. Executive Director's Report: None.

8. Member Reports: None.

Vice Chair Ovadia adjourned the meeting at 3:33 p.m.

2020-21 Stormwater Committee Attendance														
Agency	Representative	Position	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June
Atherton	Robert Ovadia	Public Works Director	X	X										
Belmont	Peter Brown	Public Works Director	X	X										
Brisbane	Randy Breault	Public Works Director/City Engineer	X											
Burlingame	Syed Murtuza	Public Works Director	X	X	C									
Colma	Brad Donohue	Director of Public Works and Planning	X	X	A									
Daly City	Richard Chiu	Public Works Director	X	X	N									
East Palo Alto	Kamal Fallaha	City Engineer			C									
Foster City	Norm Dorais	Public Works Director	X	X	E									
Half Moon Bay	Maziar Bozorginia	City Engineer	X	X	L									
Hillsborough	Paul Willis	Public Works Director	X	O	E									
Menlo Park	Nikki Nagaya	Public Works Director	X		D									
Millbrae	Andrew Yang	Senior Engineer	X	X										
Pacifica	Sam Bautista	Public Works Director/City Engineer	O											
Portola Valley	Howard Young	Public Works Director		X										
Redwood City	Saber Sarwary	Supervising Civil Engineer	X						X					
San Bruno	Jimmy Tan	City Engineer	X	X										
San Carlos	Steven Machida	Public Works Director	X	X										
San Mateo	Brad Underwood	Public Works Director	X	X										
South San Francisco	Eunejune Kim	Public Works Director												
Woodside	Sean Rose	Public Works Director	X											
San Mateo County	Jim Porter	Public Works Director	X	O										
Regional Water Quality Control Board	Tom Mumley	Assistant Executive Officer												

"X" - Committee Member Attended

"O" - Other Jurisdictional Representative Attended

C/CAG AGENDA REPORT

Date: October 15, 2020

To: Stormwater Committee

From: Matthew Fabry, Program Manager

Subject: Receive presentation on California Stormwater Quality Association 2020 program updates.

(For further information or questions contact Matthew Fabry at mfabry@smcgov.org)

RECOMMENDATION

That the Stormwater Committee receive presentation on California Stormwater Quality Association (CASQA) 2020 program updates.

BACKGROUND/DISCUSSION

C/CAG, through the Countywide Water Pollution Prevention Program, annually purchases an area-wide municipal stormwater membership to CASQA on behalf of its member agencies. As Executive Director, Geoff Brosseau provides annual updates to area-wide municipal members on CASQA's achievements, ongoing activities, and future plans, as well as member benefits. As CASQA members, C/CAG's member agencies are entitled to various benefits, including discounted pricing for meetings and the annual conference, statewide representation on regulatory issues of concern, access to CASQA work products and news updates, etc. In addition to the area-wide membership, C/CAG purchases group subscriptions to CASQA's Construction and Commercial/Industrial Best Management Practices (BMP) web portals, giving access to each agency to the latest information on construction and commercial/industrial stormwater management.

ATTACHMENTS

None

C/CAG AGENDA REPORT

Date: October 15, 2020

To: Stormwater Committee

From: Matthew Fabry, Program Manager

Subject: Receive a presentation on “*How Healthy is the Bay?*” An Update from the Regional Monitoring Program for Water Quality in San Francisco Bay.

(For further information or questions, contact Matthew Fabry at mfabry@smcgov.org)

RECOMMENDATION

Receive a presentation on “*How Healthy is the Bay?*” An Update from the Regional Monitoring Program for Water Quality in San Francisco Bay.

BACKGROUND

Staff from the San Francisco Estuary Institute (SFEI) will provide a brief presentation summarizing the current state of knowledge regarding the health of San Francisco Bay, based on data gathered through the Regional Monitoring Program for Water Quality in San Francisco Bay (RMP). The RMP is funded through required financial contributions from in-Bay dischargers and C/CAG pays into the RMP on behalf of its member agencies for their required contributions under the Municipal Regional Stormwater Permit. Member agencies may also pay into the RMP under their wastewater treatment plant discharge permits. SFEI’s lead scientist will summarize what is known regarding key pollutants (PCBs and mercury) and their impacts on Bay water quality, aquatic life, and human-based uses of the Bay (such as fishing), as well as information on “emerging contaminants” that may represent new challenges facing agencies responsible for keeping pollution out of the Bay.

ATTACHMENTS

1. None

C/CAG AGENDA REPORT

Date: October 15, 2020

To: Stormwater Committee

From: Matthew Fabry, Program Manager

Subject: Receive update on the Municipal Regional Permit reissuance process and Regional Water Board response letter regarding Green Infrastructure Plans.

(For further information or questions contact Matthew Fabry at mfabry@smcgov.org)

RECOMMENDATION

That the Stormwater Committee receive an update on the Municipal Regional Permit reissuance process and Regional Water Board response letter regarding Green Infrastructure Plans.

BACKGROUND/DISCUSSION

The five-year term of the Municipal Regional Stormwater Permit Order No. R2-2015-0049 (MRP 2.0) issued by the San Francisco Bay Regional Water Quality Control Board ends on December 31, 2020. Like the previous negotiation process for MRP 2.0, countywide stormwater program representatives, Regional Water Board staff, permittee representatives, and technical consultants to the programs have convened an MRP 3.0 Steering Committee and various workgroups to facilitate the negotiation process on key provisions of the MRP.

Workgroups are focused on the following permit provisions/topics: Trash, Provision C.3/Green Infrastructure (GI), Provision C.8 Water Quality Monitoring, Provisions C.11/12 mercury/PCBs/Reasonable Assurance Analyses, Provisions C.4/C.5 Commercial/Industrial Source Control, homelessness and urban firefighting flows, and tracking and reporting.

At the last MRP 3.0 Steering Committee meeting held on September 29, Water Board staff provided an updated tentative schedule for the reissuance of the next permit as detailed in Attachment 1. This new schedule proposes an additional 10 months between the end of the current permit and the Water Board adoption of the new permit in October 2021, with a permit effective date of July 2022. This new timeline provides a welcome time extension, during which the MRP 2.0 provisions will remain in effect, to plan for and procure new consultant support to the countywide stormwater program in preparation for the new permit.

During the last Steering Committee meeting, countywide program staff, permittees and Water Board staff also addressed key priority areas of negotiation that are currently under discussion by the various work groups, including C.3 provisions on new and redevelopment, C.8 water quality monitoring, C.10 trash provisions, developing targets for PCBs and mercury load reductions under C.11/C.12, addressing homelessness and proposed cost reporting. The work groups will continue to resolve questions and concern about proposed modifications that would impact local resources and management strategies before the planned release of the administrative draft of the permit in

November. As part of the discussion around achieving meaningful progress with implementation of the Green Infrastructure Plans submitted by permittees in September 2019, Water Board staff circulated a Green Infrastructure Plan Review Memo (Attachment 3) on October 1, 2020. The memorandum provides a summary of the findings from reviewing municipal Green Infrastructure Plans, including strengths and weaknesses overall and among specific jurisdiction plans, and suggests a series of potential follow-on provisions for C.3 Green Infrastructure Plan implementation sub-provisions that Water Board staff plan to include in the next permit.

Staff will review the tentative schedule for reissuance of the permit, summarize the remaining key areas of negotiation based on the discussion at the September 29 MRP 3.0 Steering Committee and provide an overview of the high-level findings from the Water Board's review of Green Infrastructure Plans and what the implications may be for municipalities in terms of the approach to green infrastructure implementation in San Mateo County.

ATTACHMENTS

1. Tentative schedule for MRP 3.0 reissuance
2. MRP 3.0 Steering Committee presentation, September 29, 2020
3. Green Infrastructure Plan Review Memo, dated October 1, 2020

Tentative MRP 3.0 schedule *(revised 9/28/2020)*

	2020		2021											2022
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct		July 1
November 2020 – Release administrative draft to permittees														
60-day review/comment period														
January 2021 – Comments due on administrative draft														
Water Board staff considers comments and drafts Tentative Order														
April 2021 – Water Board releases Tentative Order														
60-day review/comment period														
May 2021 – Board testimony hearing														
June 2021 – Board testimony hearing														
June 2021 – Comments due on Tentative Order														
Water Board staff respond to comments and revise TO														
Water Board staff completes Order														
October 2021 – Board adoption hearing														
July 2022 – Permit effective date														

Major Modifications Proposed by Water Board Staff that are Currently Under Discussion by Work Groups

September 2020

C.3 – New & Redevelopment

Topic	Proposed Modification
Regulated Projects	<ul style="list-style-type: none">• Reduce threshold to 5,000 SF (Year 3)• Single family homes – 10,000 SF• Roads – 1 acre new/reworked IA (Year 3)
Special Projects	<ul style="list-style-type: none">• Phase out Category C by Year 3
Asset Management	<ul style="list-style-type: none">• Required elements to include in AM system (plan by Year 3 and implement by end of permit term)
GI Implementation	<ul style="list-style-type: none">• Minimum requirement to implement non-regulated public retrofit project(s) (no. of projects or no. of greened acres)

C.8 – Water Quality Monitoring

Topic	Proposed Modification
Creek Status Monitoring (CSM) - Management Questions	New Management Questions regarding flow reductions and urban stormwater pollutants, however <ul style="list-style-type: none">- CSM does not include flow monitoring- CSM addresses overall creek health and does not include Bay-focused pollutants of concern (POCs), which are addressed separately
POC Monitoring - Overall	No more than 25% of POC samples can be used to satisfy multiple monitoring categories
POC Monitoring – PCBs and Hg Information Needs	Increased focus on collection of information for developing models and evaluating BMPs and decreased focus on collection of information for source area (property) identification
POC Monitoring – Constituents of Emerging Concern (CECs)	CEC monitoring requirements may not be solely addressed through current level of RMP participation

C.10 – Trash Load Reduction (Part 1)

Topic	Proposed Modification
Compliance Dates	<ul style="list-style-type: none">• 90% reduction (non-enforceable) performance guideline to be met by July 2022• 100% reduction mandatory compliance threshold by July 2025
Source Control Credits	<ul style="list-style-type: none">• No credit for existing actions• Credit for new actions only towards 90% guideline; only associated with trash remaining to be managed• Elimination of all credits at 100% threshold
Receiving Water Monitoring	<ul style="list-style-type: none">• TBD
Trash Hot Spot Cleanups/Assessments	<ul style="list-style-type: none">• Eliminate provision

C.10 – Trash Load Reduction (Part 2)

Topic	Proposed Modification
Creek/Shoreline Cleanups & Direct Discharge Offsets	<ul style="list-style-type: none">• Offsets ongoing until 100% threshold. Elimination of all credits at 100% threshold.
Long-Term Plan & Practicability Evaluation	<ul style="list-style-type: none">• If Permittees do not expect to achieve 100% by July 2025, submit revised long-term plan and propose schedule• Conduct evaluation of trash controls to determine where it is impracticable to achieve compliance
Other Items	<ul style="list-style-type: none">• Curb Inlet Screen Performance Standard• Trash reduction benefits of LID

C.11/C.12 – Mercury and PCBs Controls

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

Homeless Encampment Management (New Provision)

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

Implementation Cost Reporting (New Provision)

Topic	Proposed Modification
Objectives	<ul style="list-style-type: none">• Set objectives and broad expectations in MRP for tracking and reporting implementation costs
Tracking/Reporting Framework and Methods	<ul style="list-style-type: none">• Permittees develop and submit a proposed Cost Reporting Framework/Methods early in permit term• Preference for regional consistency
Tracking and Reporting Implementation Costs	<ul style="list-style-type: none">• Using framework/methods, Permittees begin tracking and reporting costs mid/latter half of permit term on annual basis

San Francisco Bay Regional Water Quality Control Board

Sent via email; no hard copy to follow

CIWQS Place ID: 756972

To: Jim Scanlin, Alameda County Clean Water Program, jims@acpwa.org
Karin Graves, Contra Costa Clean Water Program, karin.graves@pw.cccounty.us
Kevin Cullen, Fairfield-Suisun Urban Runoff Management Program,
kcullen@fssd.com
Adam Olivieri, Santa Clara Valley Urban Runoff Pollution Prevention Program,
awo@eoainc.com
Matt Fabry, San Mateo Countywide Water Pollution Prevention Program,
mfabry@smcgov.org
Jennifer Harrington, Vallejo Flood & Wastewater District,
jharrington@vallejowastewater.org
Geoff Brosseau, Bay Area Stormwater Management Agencies Association,
geoff@brosseau.us

From: Zach Rokeach, Water Resource Control Engineer

Date: October 1, 2020

Subject: **Water Board Staff's Review of the 2019 Green Infrastructure Plans**

This memo provides Water Board staff's comments on the Green Infrastructure Plans (Plans) required by Provision C.3.j.ii.(2) of the Municipal Regional Stormwater NPDES Permit (MRP) and submitted by the Permittees with their Fiscal Year 2018-2019 Annual Reports. The Plans demonstrate how and the extent to which the Permittees have institutionalized green stormwater infrastructure (GI) implementation into their municipal apparatus. This memo summarizes some of the Plans' major themes. Appendix A gives examples of Plan sections that were exemplary and could serve as models for future Permittee plan improvements as well as Permittees' Plans that need updates or other improvements. Appendix B summarizes at a countywide level reported Permittee impervious surface GI retrofit targets for 2020, 2030, and 2040.

Overall, the commitment to GI implementation ranges significantly between Plans, but all include commitments consistent with completion of Regulated Projects for which the MRP requires a low impact development approach. The Plans generally do not commit to accelerate the existing rate of green stormwater infrastructure implementation, or to retrofit existing

impervious surfaces with clean water controls to address urban runoff discharges from existing impervious surface, beyond what the MRP already requires for Regulated Projects.

Consequently, the Plans are limited in the extent to which they would reduce the adverse water quality impacts of urbanization and urban runoff on receiving waters over time. In general, while there are salutary approaches to modestly expand the scope of benefits accomplished by regulated projects, and a number of Plans consider opportunities to achieve multiple goals via GI implementation, the Plans collectively propose limited retrofit of existing urban impervious surfaces, including roads, beyond the work that would be accomplished via regulated project implementation, in the coming twenty years.

Most Plans provide the information required by Provision C.3.j, but some are missing required elements and some are not at an appropriate level of detail in certain sections. They generally thoughtfully reference existing municipal character and goals and how those inform existing and potential future runoff drainage design. They are generally effective at noting existing plans and policies, needs or opportunities for improvement, and approaches to completing those updates. They describe the substantial technical work that has been accomplished over the past twenty-plus years of Bay Area GI development and implementation, including the broad availability of technical guidance and standards and specifications for implementation.

During the coming Permit term, we will likely require the update of Plans—such as where Plans indicate work, such as general plan, policy, or ordinance updates, is about to be completed—and where shortcomings are identified, such as needs for more-detailed information or ensuring Plans appropriately reference allowed sizing approaches. In other words, rather than calling for updates now, we will propose requirements in MRP 3 to remedy shortcomings via updated and/or addended Plans. Following is a more detailed discussion of the different plan elements. As described in the following section, directives for improvements and updates include:

- Revise prioritization mechanisms to include consideration, or reconsideration, of cooperation with non-municipal entities such as schools on GI implementation (C.3.j.i(2)(a) and (b));
- Reference ongoing or planned coordination either directly with other jurisdictions or at the countywide level which would identify regional project opportunities, and identify the tasks and timing necessary to successfully implement those regional projects (C.3.j.i(2)(c));
- Revise tracking tools to include a component that is not only publicly available, but also easily can be found by the public (C.3.j.i(2)(d));
- Review countywide GI implementation guidance documents, adapt them as necessary to account for local considerations, and state that this review and adaptation have been completed (if deemed not necessary, explain why that is the case) (C.3.j.i(2)(e) and (f));
- When Plans invoke the BASMAA alternative sizing criteria, ensure they also reference and briefly summarize (and ideally, link to) the Water Board's conditional approval of those criteria (C.3.j.i(2)(g));
- Finish updating relevant planning documents to include language supporting GI implementation and summarize those updates, and justify each instance where a Permittee has decided that a relevant planning document does not need to be updated to further support GI implementation (C.3.j.i(2)(h) and (i));

- Update workplans to complete C.3.e.i or C.3.j.ii projects so that they're compliant with the MRP's directives (C.3.j.i(2)(j)); and
- Evaluate opportunities to leverage municipal approval of private development to fund GI implementation (C.3.j.i(2)(k)).

C.3.j.i.(2)(a) & (b) - Mechanism to Prioritize and Map Planned and Potential Projects & Outputs

Subprovisions (a) and (b) required Permittees to include (a) a mechanism to prioritize and map areas for potential and planned projects, both public and private, on a drainage-area-specific basis, through 2040; and (b) the outputs of the prioritization mechanism, including the prioritization criteria, map, list, and associated information.

Most often, the Plans derive their mechanisms for GI project identification and prioritization from their county Storm Water Resource Plans (SWRPs) and preliminary PCBs/Hg Reasonable Assurance Analyses (RAAs), adapting them to local challenges and considerations. The primary purpose of participating in SWRPs is for Permittees to be eligible to apply for certain state grants, and the purpose of the RAAs is to ensure that Permittees will achieve the waste load allocations specified in the San Francisco Bay polychlorinated biphenyls (PCBs) and mercury TMDLs. A few Plans take this a step further and create a mechanism from scratch, and several more reference the County's SWRP mechanism without adapting it to account for local challenges or considerations. Plans also appropriately considered environmental constraints and opportunities for multiple benefits. For example, a number of Plans looked at opportunities to coordinate with Safe Routes to Schools projects. San Mateo County's Plan considered multiple benefits, including: community enhancement; creating or enhancing natural habitat; reestablishing natural hydrology; source control; and groundwater recharge and augmenting water supply.

The Plans' prioritization frameworks mostly consider for prioritization non-regulated public right-of-way projects, rather than regulated or non-regulated private projects, or some combination of public and private implementation. There are a few exceptions, such as requiring frontage greening as a condition of project approval. Incorporating frontage greening is an opportunity for Permittees to more fully recognize the impacts of new and redevelopment projects by allowing a modest increase in the area required for treatment, and should be considered by Permittees in future plan updates for those Permittees who have appropriate development and redevelopment projects. The outputs of these mechanisms (e.g., maps and lists of prioritized and potential GI projects) often do not demonstrate that GI will be implemented to a level beyond minimum MRP requirements for Regulated Projects.

These mechanisms are well thought out and several have already resulted in limited GI implementation. However, GI implementation targets in the Plans are based almost entirely on regulated private projects. This is a major theme, and a major conflict: Plans describe mechanisms for non-regulated public GI implementation, but set targets based on regulated private GI implementation. The result is that pollution of receiving waters caused by discharges of urban runoff from the Bay Area's existing vast stock of public impervious surfaces is unlikely to change significantly over the coming twenty years under the proposed approaches and level of effort. This is discussed further in the following section on impervious surface retrofit targets.

One element of the prioritization process that has substantial room for improvement is coordination with schools, and to a lesser extent, other entities, such as BART and Caltrans. Some Plans describe plans to begin or work already begun to coordinate with schools regarding GI implementation. Others are silent on potential coordination, or state that they will not coordinate with schools, or otherwise rate schools low in their prioritization process. Reasons for this approach include that schools have no current mandate for clean water controls and that they can be unwilling partners due to logistical/space constraints. However, schools can offer excellent opportunities for GI implementation for reasons including their likely coverage under the upcoming reissued Small MS4 general permit—which is expected to clarify the clean water role they can play going forward; their role in climate change adaptation planning efforts; their often-substantial impervious surface coverage; and the ability of municipalities to regulate discharges from schools into their MS4s. Often, schools have some of the most-available area for GI implementation, along with budget needs that can facilitate coordination when municipalities or others are sources of funding. Some Permittees have already begun to cooperate with schools, showing that coordinated implementation is possible.

- For these reasons, Plans should be incorporating appropriately prioritized approaches to coordinate with schools. Where they do not, such as in Orinda's and the City of San Mateo's plans, the plans should be modified or should describe the absence of constraints in the city with respect to other public and private GI implementation that renders such coordination unnecessary.
- Similarly, some Plans included, but gave low prioritization scores to other non-municipal right-of-way ROW, such as BART and Caltrans. Because of the opportunities for implementation, funding, and shared need, plans should include in their prioritization approaches GI projects that may be implemented in a joint or cooperative manner, including those coordinated with schools, BART, and Caltrans.

C.3.j.i.(2)(c) - Impervious Surface Retrofit Targets

Subprovision (c) required Permittees to submit targets for the amount of impervious surface to be retrofitted within each Permittee's jurisdiction over schedules consistent with the timeframes for assessing load reductions specified in Provisions C.11 and C.12: by 2020, 2030, and 2040.

All of the Plans include impervious surface retrofit targets for the specified years. The submitted targets include some public non-regulated projects but are primarily based on forecasts of regulated private redevelopment projects. That is, they demonstrate limited or no commitment to municipal retrofit for other than already-regulated projects. As examples, Oakland's Plan sets a target of retrofitting 0.8 acres of public impervious surface over the next twenty years, for both regulated and non-regulated public projects. This target does not account for a Capital Improvement Plan project list in Oakland's Plan that indicates consideration of numerous projects with potential GI implementation, including miles of street projects. In contrast (a small municipality) Clayton's Plan targets retrofit of one acre of public impervious surface over the coming twenty years.

These outcomes represent a missed opportunity, in that the MRP's green infrastructure planning requirement was included as an alternative to expanding, during the current permit term, the Regulated Project definition to include all new and redevelopment projects that create or replace 5,000 square feet of impervious surface, and roadway projects that just replace existing

impervious surface area.¹ That is, Provision C.3.j was included in part to provide municipalities opportunity to evaluate and account for smaller area regulated projects and road replacement projects as part of their GI Plans and develop commitments to implementation that would be more efficient and effective for them than a permit requirement to include all such projects.

Many Plans do include some public projects in their GI implementation targets, but among those public projects, it appears that most are regulated by the MRP. One Plan, San Jose's, includes substantial public non-regulated GI project implementation, which is in part an outcome of San Jose's 2016 Consent Decree with the San Francisco Baykeeper, demonstrating that municipal commitment of funding to GI retrofit has the potential to result in substantial implementation. Overall, the contribution by non-regulated public projects is small relative to the contribution by regulated private projects.

As noted above, while the prioritization mechanisms tend to focus on implementation of GI in non-regulated (and, to some extent, regulated) public projects, the targets are comprised mostly of GI/LID retrofits predicted to be required by private new and redevelopment projects that are under the MRP's regulated project definition. This suggests that the Plans have established mechanisms for GI implementation that may not be used; the two most common explanations given for that are lack of funding and engineering constraints.

Most Plans reference the upcoming RAAs, due with the Permittees' 2020 ARs, and a subset of those Plans provide targets that were developed to satisfy each Permittee's portion of the Waste Load Allocation (WLA) responsibility. Though many Plans posit that the most efficient way to reduce loads may be with GI projects in other jurisdictions or regional projects, a significant subset of those Plans did not identify potential regional project opportunities or refer to coordination efforts that would identify regional projects.

- This is an opportunity for improvement: MRP 3 will likely require Permittees to update or addend their Plans, to include references to ongoing or planned coordination either directly with other jurisdictions or at the countywide level which would identify regional project opportunities, and identification of the tasks and timing necessary to accomplish those projects.

To better understand how the impervious surface retrofit targets had been developed, WB staff met with a representative sample of Permittees. An example of what was often unclear about the targets provided in the Plans, and what was discussed during these meetings, is that many Plans distinguish between public and private projects when listing the targets, but not between Regulated Projects and Non-Regulated Projects. That distinction is necessary to give an idea of how limited or ambitious the Plans are in implementing GI beyond what's opportunistic, and to help inform GI implementation targets in the reissued MRP.

- MRP 3 may require Permittees to update the impervious surface retrofit targets, to clarify the proportions of those targets that come from Non-Regulated Projects vs from Regulated Projects.

The Permittees' impervious surface retrofit targets as reported in their Plans are included in Appendix B, along with an estimate of regional impervious surface cover. The data are grouped by county and illustrate some notable trends. First, the SCVURPPP permittees' proposed retrofit exceeds the others', based significantly on San Jose's proposed work. Second, the SCVURPPP

¹ MRP Fact Sheet, Provision C.3.j, p. A-44

and FSURMP permittees' proposed retrofits, as a percentage of their respective countywide total impervious surface, exceed the others'. Third, the SMCWPPP, ACCWP, and CCCWP permittees have proposed to retrofit only 3-4% of their respective countywide total impervious surface totals over the next 20 years. As noted, San Jose's contribution to the SCVURPPP targets is significant. San Jose targeted 1,250, 2,140, and 2,963 acres of impervious surface to be retrofitted by GI just from private Regulated Projects by 2020, 2030, and 2040, respectively. However, including the GI that the City will need to build to achieve the Critical Bacteria Storm Volume to comply with the 2016 Consent Decree with San Francisco Baykeeper regarding discharges of fecal indicator bacteria from the City's MS4 to Guadalupe River, Coyote Creek, and other City watersheds, the City's total targets rise to 1,250, 5,000, and 15,000 acres of impervious surface retrofitted by GI. San Jose's targets far exceed any other single Permittee's.

C.3.j.i.(2)(d) - Project Tracking and Mapping

Subprovision (d) required Permittees to include a process for tracking and mapping completed projects, public and private, and making the information publicly available.

Nearly all Plans reference tracking tools currently in development by the County program, with a statement that the tools include or will include components to make certain information publicly available. However, some Plans seem to suggest that GI implementation information submitted in tabular format in Annual Reports satisfies this subprovision. It does not. The tools in development generally appear appropriate to meet this subprovision's expectations, although additional information is needed as discussed below. Each Plan that references a County tracking tool, many of which are based on ArcGIS online or AGOL, and a few of which utilize GreenPlan-IT, appropriately commits to contributing data to it once the tool is ready, and many Plans discuss local tracking tools that will likely be discontinued once the County tracking tools are ready. However, most Plans do not say when the respective County tracking tool will be completed, or whether or how the tools will be available to the public, and if yes, what information will be made available. Some Plans say only that the tools have or will have mapping capabilities accessible at least by Permittee staff, but not necessarily by the public. Some plans say that "non-regulated project installations of GI are tracked as feasible in the same manner as regulated projects."

- Our expectation is that non-regulated GI projects will be tracked in the same manner as regulated projects.
- We anticipate incorporating expectations for the use of the tracking tools into the reissued MRP, including provision of at least basic information that is publicly available, and that individual municipalities' websites should at least link to that information when it is maintained on a county stormwater program's website. Publicly available information for completed GI projects should include at least: brief GI design description (e.g., bioretention, bioswale), location, land use type, and area treated. More-detailed information, such as detailed design information, operation and maintenance (O&M) costs, frequency, and GI condition, and pollutant loads treated, should be available to Permittee and Water Board staff and should help provide constructive feedback to the Permittees' programs.

We anticipate having discussions with Permittees during the coming permit term regarding how the information generated by (or stored in) these tools is being used to inform program

management. For example, how may it be used to answer questions about life cycle costs, asset management, O&M frequencies, and to inform beneficial design changes?

C.3.j.i.(2)(e) & (f) - General Guidelines for Streetscape and Project Design and Construction & Standard Specifications and Details

Subprovisions (e) and (f) required Permittees to develop new guidance (and/or modify existing guidance) to be used by project proponents to ensure that projects have a unified and complete design that implements the range of functions associated with the projects, including engineering and design information.

General guidelines for overall streetscape and project design and construction, and standard specifications and design details are mostly satisfactory. Plans largely reference or include such guidance developed by the Permittees' County programs. Many Plans adapt the County guidance documents to account for local considerations, as needed, but some Plans do not make it clear that the Permittee reviewed those materials, because they refer to the guidance documents without saying anything about whether any further adaptation was necessary. Plans should be updated to clarify this point, since the fact that several Permittees saw the need to speak to this suggests that it is an issue that could affect implementation more broadly. Some Plans also reference external guidance documents, such as those produced by the San Francisco Public Utilities Commission and the National Association of City Transportation Officials.

- MRP 3 will include a directive to clarify whether County guidance documents were appropriately reviewed by Permittee staff and adapted as necessary to account for local considerations, and to provide justification if no adaptation was deemed necessary.

The primary goal of this subprovision is to ensure that there are no barriers to GI implementation based on the availability of guidance documents and standard specifications and details during MRP 3. With their Plan submittals, Permittees have affirmed that goal has been achieved. As such, we anticipate setting an expectation in MRP 3 that Permittees update their guidance documents and standard specifications and details as needed.

C.3.j.i.(2)(g) - Treatment and Hydromodification (HM) Sizing Requirements

Subprovision (g) required Permittees to include requirements in their Plans that GI projects meet the treatment and HM sizing requirements in MRP Provisions C.3.c and C.3.d, and allows them to collectively propose an alternative sizing approach to be employed under certain constrained circumstances, which was conditionally approved by the Water Board in June 2019.

Regarding the sizing requirements, as expected, each Plan references existing local and/or County guidance for Regulated Projects, and the BASMAA conditionally approved alternative sizing guidance for non-Regulated Projects. There are a few instances of Plans that reference the alternative sizing guidance without referring to our June 2019 conditional approval of that guidance.

- MRP 3 will require Plans to be updated to address both documents. What all Plans must include, and what the conditional approval states, is: all GI projects, regulated and non-regulated, must comply with the MRP Provision C.3.d sizing requirements; with cause (e.g., significantly constrained area for a BMP, substantially increased costs for that sizing relative to the C.3.j.i.(g) approach, significant amounts of run-on from adjacent

areas, or other substantial constraints identified by Permittees) and with reporting in their ARs, Permittees may use the alternative sizing guidance for Non-Regulated GI projects.

C.3.j.i.(2)(h) & (i) - Summary of Planning Documents Relevant to GI Implementation & Workplan for Future Updates

Subprovisions (h) and (i) required Permittees to assess whether their planning documents (e.g., General Plans, Specific Plans, and Complete Streets Plans) adequately support the GI implementation laid out in the Plans and to make updates, as necessary. For those planning documents that were not adequately updated by the time the Plans were submitted, Permittees were required to develop a workplan outlining a schedule for making those updates.

Each Plan reviews the major planning documents relevant to GI implementation, such as the SWRPs, General Plans, and Climate Action Plans. The Plans generally do a fair job of describing existing language in those plans that supports GI implementation, though many Plans are satisfied with language that appears inadequate because it does not reference inclusion of GI in projects. For example, San Carlos's GI Plan states that the City's Parks Master Plan (2008), Storm Drain Master Plan (2017), and Bicycle and Pedestrian Master Plan (2019) "...do not include specific language that address[es] or support[s] GI opportunities, but involve redevelopment of public infrastructure which provides opportunities to coordinate GI projects through the CIP" (page 81). While the recognition of plans addressing public infrastructure is a useful step, the provided explanation does not provide confidence that the plans support GI implementation because they do not explicitly address it, and thus it is unclear how they will affirmatively prompt GI inclusion. In other Plans it is not clear why the existing language is sufficient because it is not described. Schedules for updates of those plans, when identified as necessary, vary widely. For instance, where one Plan commits to updating the General Plan within a few years, another Plan says the General Plan will not be updated for a decade, even when the updates are critical to encouraging GI implementation. Some Plans indicate that no updates are necessary, that appropriate language encouraging GI implementation has already been incorporated in a recent update (e.g., sometime during the current permit term).

In some cases, Plans identify overarching policy or planning documents that would be worthwhile for other Permittees to consider. For example, San Mateo County references C/CAG's Sustainable Streets Master Plan, which prioritizes locations to integrate GI into street ROW and considers how those projects may contribute to climate change resilience. This opportunity to more legibly consider and coordinate the multiple benefits of GI could facilitate implementation over time.

Several Plans reference specific plans, neighborhood plans, street master plans, or similar documents, which can allow municipalities to focus their GI implementation in an intentional and targeted manner. Examples include the City of El Cerrito's 2014 San Pablo Avenue Specific Plan, which—among other things—charges private development with impact fees to fund frontage improvements on San Pablo Avenue, and the City of Berkeley's 2019 Adeline Corridor Specific Plan, which has identified several promising GI opportunities. Master planning efforts like those framed in specific plans have long been tools for effective GI implementation. More than twenty years ago, Fremont's plan for the 840-acre Pacific Commons site enabled comprehensive district-scale stormwater planning and expectation setting in advance of parcel-specific development. We support the use of specific plans and related plans to facilitate GI

implementation, and as part of a range of GI implementation tools that should be applied throughout Permittee jurisdictions.

- In the coming Permit term, Permittees will be expected to continue to update existing plans to include, as appropriate, and to incorporate into new plans low impact development and GI expectations. Similar to El Cerrito's and Berkeley's approaches, updated and new Permittee specific plans and similar documents should incorporate GI requirements for the plan areas. In the example above, San Carlos' plans should be updated to ensure GI implementation is a required project component associated with appropriate parks, storm drain, and transportation improvements. Campbell's Plan noted several neighborhood and street master plans that could be updated to incorporate and coordinate green infrastructure expectations, and referenced development by this year of a schedule to complete those updates. That was similar to other West County municipality plans in Santa Clara County, and is a reasonable model for addressing updates during the coming Permit term.

C.3.j.i.(2)(j) - Workplan to Complete C.3.e.i or C.3.j.ii Projects

Subprovision (j) required Permittees to create a workplan to complete prioritized projects identified as part of a Provision C.3.e Alternative Compliance program or part of Provision C.3.j Early Implementation.

Workplans were expected to include the requested lists of 1) GI projects already planned for implementation during the permit term, and 2) infrastructure projects planned for implementation during the permit term with the potential for incorporation of GI. However, most of the workplans that describe how the Permittees would complete prioritized projects identified as part of Provisions C.3.e.i—Alternative Compliance or C.3.j.iii—Early Implementation simply provide a list of all of their projects with GI potential, whether or not they were planned for implementation during the permit term. Several Plans provide the requested information.

- MRP 3 may include a directive to update these workplans, so that they are compliant with what MRP 2 required.

C.3.j.i.(2)(k) - Evaluation of Prioritized Project Funding Sources

Subprovision (k) required Permittees to evaluate prioritized project funding sources.

The most common existing funding sources identified in the Plans are State grants and internal revenues. Many Plans commit to incorporating consideration of GI into the Permittees' Capital Improvement Plans (CIP) so that GI funding may be tied to CIP projects where incorporation of GI has been identified as otherwise feasible. Given existing funding constraints, most Permittees are prioritizing maintenance of existing infrastructure over addressing pollutant discharges with clean water controls.

To overcome this challenge, there is widespread interest in establishing new long-term funding sources, such as alternative compliance programs, Prop. 218- and SB 231-compliant stormwater utility fees, and permit fees. A few Plans describe existing stormwater utility fees enacted prior to Prop. 218, and others note how these fees are currently being pursued. Oakland's Plan includes a useful summary letter (App. F, Oakland 100RC Stormwater Program Financing Memo) that describes a range of available funding opportunities, in addition to citing

BASMAA's 2018 Roadmap of Funding Solutions for Sustainable Streets. Nearly every Plan that does not express interest in pursuing such fees now stresses 1) the risk associated with legal challenges, and 2) the need to wait for another Permittee to be the legal test subject for this approach.

Permittees such as San Mateo and Redwood City are leading the way by more fully recognizing the extent of development project urban runoff impacts and requiring developers to fund GI that is either beyond the MRP's minimum requirements or based on a reinterpretation of the MRP's requirements as a condition of approval.

- During the coming permit term, Permittees with regulated projects should evaluate opportunities to pursue approaches similar to those being implemented by San Mateo and Redwood City.

Funding approaches that we did not see broadly considered in the Plans include: impervious surface fees targeting all impervious surface, including single- and multi-family residential parcels, tied to the O&M of the storm drain system; and maintaining or increasing development application review and post-construction GI O&M inspection fees to a level sufficient to allow for a self-sustaining program. We welcome the opportunity to discuss funding approaches with Permittees.

There are some interesting countywide proposals unique to certain counties. For example, the Contra Costa County Plans include a discussion of legislative constraints to the use of Contra Costa Transportation Authority Sales Tax Revenue for GI implementation, and of pursuing a ruling from MTC on the Highway User Gas Tax Account. San Mateo County Plans include a discussion of the planned Flood and Sea Level Rise Resiliency Agency, which would help fund regional GI projects. We look forward to working with the Permittees to support these and any other or new similar countywide efforts. Most Plans also, appropriately, reference BASMAA's 2018 Roadmap.

Appendix A – Examples of Plan sections that are both exemplary & lacking

C.3.j.i.(2)(a) & (b) - Mechanism to Prioritize and Map Planned and Potential Projects & Outputs

Permittees that produced excellent mechanisms and outputs for GI project identification and prioritization in their Plans include Livermore, Oakland, Colma, San Carlos, Redwood City and Mountain View. For example, Colma's Plan explains that "one focus of the GI Plan is the integration of GI systems into Non-Regulated public rights-of-way projects. Another objective of the GI Plan is to provide incentives or opportunities for private property owners to add or contribute GI elements to Non-Regulated Projects. Additionally, the GI Plan provides a mechanism to establish and implement alternative or in-lieu compliance options for Regulated Projects..." In other words, Colma's Plan and a few other Plans like it allow developers who do not fit clean water controls on-site to fund the construction, operation, and maintenance of those controls elsewhere in the municipality's jurisdiction. This is distinct from the City of San Pablo's ongoing USEPA grant-funded project, which is investigating the logistics of a *countywide* alternative compliance program, and whose findings could be used to inform a regional program.

- Livermore: Spatial data for planned/potential projects provided in both GIS shape file and Google Earth KMZ file, together with the City's GI Implementation Toolbox, will be used to "make rapid assessments of the potential for including GI in projects proposed for inclusion in future CIP lists. The rapid assessment process will allow the City to maximize GI improvements in each round of capital improvement planning."
- Oakland: Outputs from three tools (ACCWP SWRP, Oakland's GIS screening application, which is part of its Urban Greening Retrofit Plan, and SFEI's Green Plan-IT) will be used to provide "...prioritized lists of potential GSI projects that could be implemented in the future should the City obtain dedicated stormwater funding... and provide a reference for CIP project managers and can be used to help obtain grant funding for GSI projects in the future."
- Colma: See above. Thoughtful pursuit of implementation opportunities beyond the minimum permit requirements for regulated projects.
- San Carlos: "One focus of the GI Plan is the integration of GI systems into Non-Regulated public rights-of-way projects. Another objective of the GI Plan, however, is to provide incentives or opportunities for private property owners to add or contribute GI elements to Non-Regulated Projects." The Plan also mentions the City's intention to "collaborate where possible with other agencies and private landowners," such as public schools, San Mateo County (presumably on regional projects), Caltrans, and SamTrans (several identified bus routes).
- Redwood City: Pursuit of a resolution to require GI beyond the minimum MRP requirements for regulated projects, by increasing the minimum implementation required by regulated projects, and/or by requiring implementation by non-regulated projects.
- Mountain View: "Because there may be opportunities for collaboration on GSI, the City has opted to also include public school opportunities... in its prioritization."

Permittees who could improve this section of their Plan include Orinda, Pleasant Hill, Hillsborough, Pacifica, South San Francisco, and Clayton. For example, Pleasant Hill's Plan appears to simply restate the County program's template text, which leaves unclear the degree to

which the City has incorporated GI implementation into its processes. Hillsborough's Plan includes language which calls into question how serious the Town is about GI implementation, even though it explains that it may pursue regional projects: "After review of the Town's CIP, no projects surfaced as having Green Infrastructure potential, because the Town's CIP is focused on non-stormwater utility and pavement repair projects." Similar to Hillsborough's Plan, Clayton's Plan says that retrofit of its existing impervious surfaces is unlikely because the City's main priority is maintaining those existing facilities, continuing the pollutant load they contribute to receiving waters. Within its limits, Clayton identified one acre of impervious surface with the potential to be retrofitted with GI over the coming twenty years. Clayton's Plan states that GI will be "...examined for incorporation into transportation projects, where funding and ROW opportunities present themselves," but the prioritization context and lack of identified projects over a multi-decade planning period suggest this is likely to result in limited implementation.

These approaches constitute a significant missed opportunity. The current permit term's GI planning effort afforded Permittees the opportunity to self-determine and commit to approaches that would gradually address the ongoing polluted discharges from existing urbanized area. We appreciate Hillsborough's and Clayton's statements that addressing those discharges is not a priority. Indeed, that was a foundation of the GI planning requirement: recognition that previous efforts, while beneficial, are insufficient to address existing urban runoff pollution, along with recognition of the opportunity to benefit by coordinating GI retrofit efforts with other municipal initiatives, like complete streets, urban greening, Safe Routes to Schools, and climate change adaptation efforts.

- Orinda: The City removed from consideration the following opportunities for GI collaboration/implementation: "...sites on private roads, projects that are public but not under City control such as school districts, Caltrans, BART, or utility properties...." These are excellent opportunities, which many other municipalities are pursuing, even though they can be challenging.
- Pleasant Hill: It appears that the City did not significantly modify the template text, leaving it unclear the extent to which the City is incorporating GI implementation into its processes.
- Hillsborough: "After review of the Town's CIP, no projects surfaced as having GI potential, because the Town's CIP is focused on non-stormwater utility and pavement repair projects." "...[In] a countywide approach, Hillsborough would only need to implement the GI that is anticipated from the combination of existing projects and future new and redevelopment, with no additional contribution from green streets." While GI implementation to address TMDL wasteload allocations is one driver, the Plan's omission of the maximum extent practicable regulatory standard and co-benefit drivers in considering potential future required or desirable GI should be addressed in the coming Permit term.
- Pacifica: The City's Plan does not include this section.
- South San Francisco: The Plan does not indicate any programmed analysis of future GI opportunities via a mechanism and incorporation into the City's practices.
- Clayton: See above. The City's Plan says that the City was built out as of the early 1970s, and therefore likely will not go beyond maintaining existing facilities.

C.3.j.i.(2)(c) - Impervious Surface Retrofit Targets

San Pablo provided a thorough explanation of its impervious surface retrofit targets. The City's Plan distinguished between Regulated and Non-Regulated projects, project type, and provided projects' tributary drainage area and project status.

Permittees who could improve this section of the Plan include: Newark and San Leandro in Alameda County; Clayton, Concord, Orinda, and Richmond in Contra Costa County; Hillsborough, Portola Valley, and Woodside in San Mateo County; the SCVURPPP Permittees (with the exception of San Jose); and Suisun City in Solano County. For example, Clayton projects one additional acre of GI will be implemented between 2020 and 2040, and the SCVURPPP Permittees (with few exceptions, such as the City of San Jose) largely did not include public projects (whether Regulated or Non-Regulated) in their targets.

- Newark: The Plan did not adequately describe what made up the targets.
- San Leandro: The Plan did not adequately describe what made up the targets, such as whether they are public or private, regulated or non-regulated.
- Clayton: See above. The Plan includes a limited implementation target.
- Concord: The Plan does not include any details on what went into the projections for public project implementation, nor indication of whether they include any non-regulated projects.
- Orinda: The Plan has insufficient explanation of what went into the public project projections, aside from incorporating template language.
- Richmond: The Plan has insufficient explanation of what went into the public project projections, aside from incorporating template language.
- Hillsborough: It is unclear what went into the targets (e.g., public vs. private, regulated vs. non-regulated, planned vs. potential).
- Portola Valley: Limited implementation target.
- Woodside: Inadequately describes existing GI implementation.
- SCVURPPP Permittees: See above regarding public projects. Some exceptions (such as San Jose).
- Suisun City: Plan identifies little potential implementation beyond 2020.

C.3.j.i.(2)(d) - Project Tracking and Mapping

Permittees that describe excellent tracking tools include Belmont, Burlingame, and Foster City. For example, Burlingame currently uses a publicly accessible GIS-based tracking tool and will contribute to the countywide tracking tool (anticipated to be completed by 2021), which will have elements that are publicly accessible.

- Each of these three Permittees maintain their own online GSI/LID tracking systems, though they may stop maintaining them once the County's tool is ready and they transition to the County tool.
- Permittees who could improve or clarify this section of the Plan include Dublin, Emeryville, Hayward, Livermore, Newark, Piedmont, Pleasanton, and San Leandro in Alameda County; Clayton, El Cerrito, Hercules, Martinez, Moraga, Pittsburg, Pleasant Hill, Richmond, and San Ramon in Contra Costa County; Half Moon Bay, Hillsborough, Menlo Park, Pacifica, San Bruno, South San Francisco, and Woodside in San Mateo

County; Mountain View and Palo Alto in Santa Clara County; and Fairfield, Suisun City, and Vallejo in Solano County. For example, Dublin's Plan was not clear about whether there would be a component of the AGOL tracking/mapping tool that would make GI implementation information publicly available, and if so, whether a link or reference to that publicly available portion of the tool would be included on the City's own website. Most of the CCCWP Permittees' Plans say something along the lines of: "The AGOL system *can be used* to develop maps that *can be displayed* on public-facing websites or distributed to the public." It is our expectation that there will be a publicly available component of the tool beyond tabular annual reporting, and if that component is not provided on each permittee's website, that it is at least linked to on each permittee's website.

- The Solano Permittees' Plans did not commit to making a portion of the tool publicly available.
- Though some of the ACCWP/SCVURPPP/SMCWPPP Permittees' Plans (those listed in the paragraph above) are ambiguous on these details, it appears that they will meet the requirements of this subprovision.

C.3.j.i.(2)(e) & (f) - General Guidelines for Streetscape and Project Design and Construction & Standard Specifications and Details

Most Permittees did a satisfactory job with these sections.

Permittees for whom this section of the Plan could be improved include Livermore, Hercules, Palo Alto, Milpitas, and Saratoga. For example, Saratoga's Plan refers to the SCVURPPP GSI Handbook, but does not include it in the Plan or link to it, so the reader may find it difficult to access.

- Livermore: Missing attachment.
- Hercules: No link provided to the resources referenced by the CCCWP template language, nor any clear indication of where to find them. Furthermore, it's not clear that the City reviewed or analyzed the resources to determine whether they require further adaptation to meet the City's local variables.
- Palo Alto: The City's Plan states that "...the City will need to create its own GSI specifications (based on those recommended by SCVURPPP) that incorporate requirements from these City departments as well as others." We support the City's efforts to adapt existing technical and design guidance in a way that will be fully implementable within Palo Alto. At the same time, by the time the GI Plan was submitted, the City had not yet completed that work. The City should update its plan to reflect the completion of that work, which we assume will be prior to the coming Permit term.
- Milpitas: Essentially the same issue as described for Palo Alto.
- Saratoga: See above. The City's Plan refers to the SCVURPPP GSI Handbook, but does not include it in the Plan or link to it, so the reader may find it difficult to access.

C.3.j.i.(2)(g) - Treatment and Hydromodification Sizing Requirements

Plans generally provided appropriate information in this section, citing existing standards and guidance. Permittees who could improve this section of their Plan include: Livermore, Hercules,

Colma and Woodside. For example, Hercules' Plan refers to the BASMAA alternative sizing guidance, but should be revised to summarize it. Other Plans, e.g., Cupertino, Milpitas, San Jose, and Saratoga, explain that the conditionally-approved alternative sizing guidance can be found in the SCVURPPP GSI Handbook, but do not link to that Handbook, explain where it can be found, or provide a sufficient summary of that section of the Handbook.

- Livermore: Missing attachment.
- Hercules: The explanation of this requirement within the Plan is unclear and may confuse the public.
- Colma: The Plan says that “Non-Regulated public street applications of GI measures must also be sized to provide treatment for the effective impervious [area] which drains to them, with an exception – they need not be designed to treat contributing private areas, such that the drainage management area (also called “catchment area”) is limited to the street right of way, or in some cases, the back of sidewalk” (p. 50). This statement should be modified to reflect MRP requirements regarding sizing. Separate from the permit requirement, this has the potential to result in significant undersizing of facilities relative to the amount of runoff discharging to them, which may result in a significantly increased maintenance burden, lack of effectiveness, and potential failure (e.g., erosion, undercutting of design components).
- Woodside: The Plan says that “GI projects are typically not regulated projects, although they must conform to the sizing and design requirements contained in Provision C.3, except under certain circumstances, and they are primarily public projects under control of the Town” (p. 6). While we agree that GI projects must conform to the MRP’s sizing and design requirements, and that there are potential circumstances when there is flexibility in the requirements, the Plan doesn’t explain the circumstances when there is flexibility. This could be accomplished by discussing, referencing, and attaching or linking the conditionally approved BASMAA alternative sizing guidance and the Water Board’s conditional approval.

C.3.j.i.(2)(h) & (i) - Summary of Planning Documents Relevant to GI Implementation & Workplan for Future Updates

Permittees that did an excellent job with this section of the Plan include: Newark and Livermore in Alameda County; Belmont and Hillsborough in San Mateo County; and Mountain View, in Santa Clara County. For example, Newark updated several of its planning documents to include “requirements to consider incorporating green infrastructure in projects that are not Regulated Projects under Provision C.3.b of the MRP.”

- Newark: The City updated its 5-year strategic plan, biennial budget for 2018-2020, pedestrian and bicycle master plan, clean bay blueprint, and stormwater requirements checklist, to include, in part, requirements to consider incorporating GI into non-regulated projects.
- Livermore: The City’s Plan says that the City is “evaluating adopting an ordinance to require development projects to treat runoff from project street frontage, as well as the development of an alternative compliance program.” This is a good example of a next step that many Permittees should consider in the coming Permit term.
- Belmont: “The City has been investigating opportunities and options to require private property owners to implement GI facilities... the City will continue to evaluate these

options and will develop and adopt policy and regulations to require the selected implementation strategies following adoption of this GI Plan. If approved, these policies would require certain development projects that are not required by the current MRP to provide GI designed to meet the [C.3.d treatment requirements]” (p. 35).

- Hillsborough: Timely updates to the General Plan, Climate Action Plan, and Storm Water Master Plan (all by December 2020).
- Mountain View: The City’s Plans says that “green stormwater infrastructure concepts have been included in many of these documents, including the City’s General Plan and precise plans that have been developed for specific defined areas of the City” (p. 14), and goes on to list some of these plans and give examples of language in them that supports GI implementation. It also explains that “as the CTMP [(Community Tree Master Plan, 2015)] is executed, projects to enhance tree cover may provide opportunities for simultaneous implementation of GSI, such as in public parking lots and public rights-of-way,” which exemplifies the kind of coordination between planning documents that can spur implementation.

Permittees who could improve this section of their Plan include: Livermore and San Leandro in Alameda County; Clayton, Hercules, Moraga, and Richmond in Contra Costa County; Daly City, Portola Valley, Redwood City, and Woodside in San Mateo County; Los Gatos in Santa Clara County; and Suisun City, in Solano County. For example, Clayton’s Plan says that no updates are planned for the General Plan, Specific Plan, or Marsh Creek Road Specific Plan. It should be updated to describe whether and how those plans incorporate GI implementation, and to the extent the plans are silent on it, the Plan should include a schedule to update them to incorporate appropriate language.

- Livermore: Workplan was not attached.
- San Leandro: Only identified modifications to the General Plan, and didn’t identify any other planning documents in need of updates, which suggests that the City may not have sufficiently evaluated anything other than the General Plan.
- Clayton: See above. The City’s Plan says that there are no updates planned for the General Plan, Specific Plan, or Marsh Creek Rd Specific Plan, but does not say if/how GI implementation is currently appropriately encouraged or supported in those plans, only that they do not “prohibit” the installation of GI. This does not meet the subdivision requirement.
- Hercules: This is missing from the City’s Plan. The Plan does not fill in the template’s prompt.
- Moraga: The City’s Plan doesn’t adequately explain if/how GI implementation is encouraged or supported in the listed planning documents, and not so in others.
- Richmond: The Plan is unclear on this section.
- Daly City: “In a review of existing planning documents, the City determined that an update of the General Plan could create a stronger connection to the goals of the GI Plan. However, since the General Plan was recently updated, the General Plan will not be updated again within the permit term.” While straightforward, this should be revised to discuss when the General Plan will next be updated and to indicate how Daly City will consider GI language during that update.
- Portola Valley: Regarding the City’s Pavement Management Plan Report (2018), the Plan says, “the 2018 PMP Report does not include language supporting the inclusion of GI

features during street maintenance and rehabilitation,” but does not say whether/how the City will address that in the next update to the plan.

- Redwood City: The City’s Plan asserts that it has not yet completed this required task. It does not say whether it has initiated the task, or when it will be completed.
- Woodside: The City’s Plan insufficiently describes if/how it will update its General Plan, Storm Drain Master Plan, Climate Action Plan, and other relevant planning efforts, and, if so, by when. Furthermore, it is not clear whether the City has initiated any of this required work.
- Los Gatos: It’s not clear if/how various planning documents will be updated to incorporate language more supportive of GI implementation.
- Suisun City: The City’s GI Plan explains that the General Plan was last updated in 2015 and needs to be updated to better support GI implementation, but it does not say when that will be done.

C.3.j.i.(2)(j) - Workplan to Complete C.3.e.i or C.3.j.ii Projects

Permittees that did an excellent job with this section of the Plan include Livermore, Atherton, Mountain View, and Unincorporated Contra Costa County. For example, Livermore’s Plan listed three Non-Regulated projects that are planned to be completed by the end of the permit term. Additionally, this section of Livermore’s Plan describes additional requirements beyond the minimum mandated by the MRP that the City is evaluating: “The City is currently reviewing opportunities to require larger or more complex private development projects to include GI in addition to that required by MRP Provision C.3, on a case-by-case basis, through developer agreements. Under such agreements the City can negotiate with developers in order to impose certain conditions (such as additional GI) on proposed projects and, in exchange, [give] private developers the assurance that their project will be approved.”

- Livermore: See above. “The City is currently reviewing opportunities to require larger or more complex private development projects to include GI in addition to that required by MRP Provision C.3, on a case-by-case basis, through development agreements. Under such agreements, the City can negotiate with developers in order to impose certain conditions (such as additional GI) on proposed projects and, in exchange, private developers the assurance that their project will be approved.” This is precisely the kind of leverage all Permittees can exercise, and we applaud Livermore for taking this on during the current permit term.
- Atherton: Clear workplan for the Cartan fields regional stormwater capture project, plus “permeable material use” with encroachment permit request. Early implementation projects are either completed or under construction.
- Mountain View: Four early implementation projects to include GI by end of 2020. The Plan also says that “GSI facilities have also been installed in other public places as part of regulated projects that exceeded the impervious surface threshold in Provisions of the MRP.”
- Unincorporated Contra Costa County: Funding secured for early implementation projects in 2019 and 2020.

Permittees for whom this section of the Plan could be improved include Pleasanton. This section is not included in Pleasanton’s Plan. However, as explained in the main section of this memo,

most Permittees did not provide the requested information for this subprovision, and will likely be tasked with providing compliant workplans during MRP 3.

C.3.j.i.(2)(k) - Evaluation of Prioritized Project Funding Sources

Permittees with excellent discussions of existing and potential funding sources, or above-average funding commitments include Albany, Livermore, Oakland, Pleasanton, Pittsburg, Burlingame, and Los Altos. For example, whereas many Permittees expressed interested in a Proposition 218-compliant stormwater utility fee, but have not pursued it because of legal concerns, Los Altos is pursuing such a fee, and as of May 2019 had initiated the balloting process. Such a fee would serve as a “dedicated and sustainable funding source for CIP projects.”

- Albany: Thorough discussion of funding options. Several promising options that the City may pursue in the near future.
- Livermore: Thorough discussion of funding options. Several promising options that the City may pursue in the near future.
- Oakland: The City’s 100 Resilient Cities memo provides a potentially useful introductory summary of funding options.
- Pleasanton: Thorough discussion of funding options. Several promising options that the City may pursue in the near future.
- Pittsburg: The City currently encourages private developers to do alternative compliance as a means to fund retrofits of public infrastructure, and in those instances, requires the developers to fund the O&M in perpetuity. The City also receives developer contributions through subdivision requirements and development impact fees.
- Burlingame: The City may require (or simply encourage, if possible) private developers to contribute to GI implementation beyond the minimum requirements for regulated projects.
- Los Altos: See above.

Permittees who could improve this section of their Plan include Hayward and Hercules.

- Hayward: The City’s Hayward’s Plan does not make clear that the City has made a significant effort to investigate potential GI funding sources and should be revised to address this omission.
- Hercules: This section of the City’s Plan is largely limited to the template CCCWP language.

Appendix B – Summary of Targets and Regional Impervious Surface Data

- Summary of GI Targets presented in Permittees' Plans

	2020 (acres)	2030 (acres)	2040 (acres)
Alameda	2,900	4,100	5,400
Contra Costa	1,200	2,100	3,500
San Mateo	1,000	2,000	3,700
Santa Clara	3,900	9,200	21,000
Solano	2,900	3,700	4,400
Total	12,000	21,000	38,000

Note: Per the MRP schedule, the East Contra Costa Permittees have not yet submitted their Plans.

- Estimated county impervious surface area (based on 2016 NLCD)

	Impervious area (acres)
Alameda	160,000
Contra Costa	130,000
San Mateo	84,000
Santa Clara	180,000
Solano	45,000
Total	590,000

- Proposed Long-Term GI Retrofit (percent of estimated county impervious surface area retrofitted based on submitted targets)

	2020	2030	2040
Alameda	2%	3%	3%
Contra Costa	1%	2%	3%
San Mateo	1%	2%	4%
Santa Clara	2%	5%	12%
Solano	6%	8%	10%
Total	2%	4%	6%

Note: Each county program's row uses that county's total as a denominator, and the Total row uses all of the counties' totals as a denominator.

C/CAG AGENDA REPORT

Date: October 15, 2020

To: Stormwater Committee

From: Matthew Fabry, Program Manager

Subject: Receive update on developing the Draft Countywide Sustainable Streets Master Plan.

(For further information or questions contact Matthew Fabry at mfabry@smcgov.org)

RECOMMENDATION

That the Stormwater Committee receive an update on developing the Draft Countywide Sustainable Streets Master Plan.

BACKGROUND/DISCUSSION

C/CAG was awarded a \$986,300 Adaptation Planning Grant by Caltrans to develop a Countywide Sustainable Streets Master Plan (SSMP) that prioritizes street segments throughout the county for integrating green stormwater infrastructure with other planned investments and community priorities. The project includes the following key tasks:

- Community Engagement
- Climate Adaptation Risk Analysis on Local Transportation Network
- High-Resolution Data Analysis and Fine-Scale Drainage Delineation
- Prioritization of Sustainable Streets Opportunities and Development of Master Plan
- Project Concepts
- Web-based Sustainable Streets Project Implementation Mapping and Tracking Tool

The project is intended to evaluate precipitation-based climate change impacts for managing runoff from the roadway network and prioritize opportunities for integrating green stormwater infrastructure to help adapt the roadway network and downstream infrastructure. The Master Plan will prioritize specific roadway segments for integration of green infrastructure in five-, 10-, and 20-year time horizons and will include 11 project concepts. The work products will directly support C/CAG member agencies' Green Infrastructure Planning efforts required under the Municipal Regional Permit.

The project is now in its last phase, and C/CAG staff will provide an overview of recent progress and deliverables, including the development of 11 project concepts; creating a virtual "open house" for the last phase of public engagement; and the schedule for review and comment on the draft/final draft Master Plan and the proposed approach for adopting the plan as a C/CAG countywide planning document.

ATTACHMENTS