

**FY 2021/22  
Municipal Stormwater NPDES Permit  
Compliance Assistance**

**General Services  
Scope of Work and Budget**

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



**Prepared by EOA, Inc.**



**June 1, 2021  
Amendment No. 1 – September 9, 2021  
Amendment No. 2 – June 1, 2022**

## INTRODUCTION

EOA, Inc. (EOA) prepared this scope-of-work and budget to provide general permit compliance services to the San Mateo Countywide Water Pollution Prevention Program (Countywide Program or SMCWPPP). SMCWPPP is a program of the City/County Association of Governments of San Mateo County (C/CAG). The scope and budget are for EOA to assist the Countywide Program to help San Mateo County Permittees to comply with municipal stormwater permit requirements found in NPDES Permit No. CAS612008, commonly referred to as the Municipal Regional Permit (MRP). The following sections describe EOA's general services tasks, budgets, and deliverables for FY 2021/22 (i.e., July 2021 – June 2022).<sup>1</sup>

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

Per C/CAG direction, additional scope and budget were added via the following Task Order amendments:

- Amendment No. 1 – September 9, 2021
- Amendment No. 2 – June 1, 2022

Additional budget amounts are shown in Table 1 and Exhibit A, and revised scope and budget details are shown in the below sections. Text pertaining to Amendment No. 2 is highlighted in blue throughout this document.

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<sup>1</sup> Please note that EOA prepared a separate document that provides a scope and budget for WY 2022 water quality monitoring tasks.

**Table 1. Summary of Tasks and Budgets.**

<b>Task No.</b>	<b>Description</b>	<b>Budget</b>
SMC311	General Support to Program Manager	\$188,734
	Amendment No. 1 Additional	\$146,342
	Amendment No. 2 Additional	\$5,548
SMC312	Subcommittee Support	\$171,792
SMC313	Training	\$83,250
SMC314	General Support to Program Manager	\$284,448
	Amendment No. 1 Additional	\$87,745
	Amendment No. 2 Additional	\$36,806
SMC315	Mercury and PCBs Load Reduction	\$60,148
	Amendment No. 1 Additional	\$19,176
SMC316	Annual Reporting	\$40,322
	Amendment No. 2 Additional	\$40,322
<b>Total Original Budget:</b>		<b>\$828,694</b>
<b>Total Additional Budget per Amendment No. 1:</b>		<b>\$253,263</b>
<b>Total Budget per Amendment No. 1:</b>		<b>\$1,081,957</b>
<b>Total Additional Budget per Amendment No. 2:</b>		<b>\$82,676</b>
<b>Total Budget per Amendment No. 2:</b>		<b>\$1,164,633</b>

Note: See Exhibit A for more details.

## TASK SMC311 – GENERAL SUPPORT TO PROGRAM MANAGER

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

### SUBTASK SMC311.01: GENERAL SUPPORT

EOA will continue to provide general support to assist C/CAG's Program Manager in running the Countywide Program, ongoing review of subtask budgets and deliverables, scheduling committee meetings, strategic planning, ensuring that permit compliance dates and deliverables are met, and other types of general technical support. This task includes preparing for and participating in a check-in call with the Program Manager and staff (generally every other week) and conducting follow-up actions as needed. This task also includes on-call assistance to municipal staff by responding to their emails and telephone calls as needed. In addition, this task includes overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff working on various components of the Countywide Program. Examples of this management and coordination of EOA staff include reviewing and editing selected draft subcommittee and workgroup meeting summaries, reviewing and/or discussing subtask, subcommittee, workgroup, and/or workshop scopes, budgets, and materials such as agendas, presentations, and workplans, and coordinating potential meeting/workshop dates. Finally, this task includes preparation of monthly invoices that include a detailed accounting of the work completed that month broken down by subtask, including EOA staff labor, subcontractor charges, and expenses incurred.

#### Deliverables:

- General technical and regulatory support to C/CAG's Program Manager.
- Preparing for and participating in a check-in call with the Program Manager and staff (generally every other week) and conducting follow-up actions as needed.
- On-call communications with municipal staff.
- Overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff working on various components of the Countywide Program (e.g., reviewing and editing selected draft subcommittee and workgroup meeting summaries, reviewing and/or discussing subtask, subcommittee, workgroup, and/or workshop scopes, budgets, and materials such as agendas, presentations, and workplans, and coordinating potential meeting/workshop dates).
- Preparation of monthly invoices that include a detailed accounting of the work completed broken down by subtask, including EOA staff labor, subcontractor charges, and expenses incurred.

**Budget: \$67,318**

**Amendment No. 1 Additional Scope:**

EOA will continue to provide general support to assist C/CAG staff in running the Countywide Program, ongoing review of subtask budgets and deliverables, scheduling committee meetings, strategic planning, ensuring that permit compliance dates and deliverables are met, and other types of general technical support. This task includes preparing for and participating in additional check-in calls with C/CAG staff and conducting follow-up actions as needed.

**Amendment No. 1 Additional Deliverables:**

- Preparing for and participating in additional check-in calls with C/CAG staff so that meetings are generally held weekly and conducting follow-up actions as needed.
- To the extent feasible within amended subtask budget, additional communications with C/CAG staff as needed in between weekly meetings.

**Additional Subtask Budget per Amendment No.1: \$18,360**

**Amendment No. 2 Additional Scope:**

During the month of July 2022, EOA will continue to provide general support to assist C/CAG staff in running the Countywide Program, ongoing review of subtask budgets and deliverables, scheduling committee meetings, strategic planning, ensuring that permit compliance dates and deliverables are met, and other types of general technical support. This task includes preparing for and participating in additional check-in calls with C/CAG staff and conducting follow-up actions as needed.

**Amendment No. 2 Additional Deliverables:**

- During July 2022, preparing for and participating in up to four additional weekly check-in calls with C/CAG staff and conducting follow-up actions as needed.
- During July 2022, ongoing general support to assist C/CAG staff in running the Countywide Program, ongoing review of subtask budgets and deliverables, scheduling committee meetings, strategic planning, ensuring that permit compliance dates and deliverables are met, and other types of general technical support.
- To the extent feasible within amended subtask budget, additional communications with C/CAG staff during July 2022 as needed in between weekly meetings.

**Additional Subtask Budget per Amendment No.1: \$5,548**

**SUBTASK SMC311.02: STORMWATER COMMITTEE SUPPORT**

EOA will continue to support to the Program Manager in facilitating C/CAG's Stormwater Committee (which meets every other month, with some monthly meetings cancelled). The budget for this subtask assumes that one EOA manager will attend three of the FY 2021/22 meetings and prepare and give a presentation at each of these three meetings.

EOA will also assist the Program Manager to facilitate two meetings of the Countywide Program's Stormwater Committee ad-hoc permit implementation workgroup. This workgroup generally focuses on providing guidance from higher-level municipal staff on implementation of priority permit provisions

including trash controls, green infrastructure (GI), and mercury and PCBs controls and associated compliance issues. Other priority topics that may be addressed by this group include reissuance of the MRP. The budget for this subtask assumes that one EOA manager will prepare for and attend two FY 2021/22 workgroup meetings.

**Deliverables:**

- One EOA manager will attend three of the FY 2021/22 Stormwater Committee meetings and prepare and give a presentation at each of these three meetings.
- One EOA manager will prepare for and attend two FY 2021/22 meetings of the Stormwater Committee ad-hoc permit implementation workgroup.

**Budget: \$13,920**

**Amendment No. 1 Additional Scope:**

EOA Managers will continue to support to C/CAG staff in facilitating C/CAG's Stormwater Committee, which meets most months. EOA Managers will also assist C/CAG staff to facilitate meetings of the Countywide Program's Stormwater Committee ad-hoc permit implementation workgroup. This workgroup generally focuses on providing guidance from higher-level municipal staff on implementation of priority permit provisions including trash controls, green infrastructure (GI), and mercury and PCBs controls and associated compliance issues. Other priority topics that may be addressed by this group include reissuance of the MRP.

EOA will also provide as-needed support with developing agenda packages for the remaining monthly FY 2021/22 Stormwater Committee meetings. In addition, as needed an Associate level EOA staff will attend meetings of the Stormwater Committee, take notes, and develop a draft meeting summary focusing on important outcomes and action items.

**Amendment No. 1 Additional Deliverables:**

- One EOA manager will prepare for (e.g., develop a presentation) and attend three additional FY 2021/22 Stormwater Committee meetings or its ad-hoc permit implementation workgroup.
- Provide C/CAG staff with as-needed support with developing agenda packages for the remaining monthly FY 2021/22 Stormwater Committee meetings.
- An Associate level EOA staff will attend up to eight meetings of the Stormwater Committee, take notes, and develop a draft meeting summary focusing on important outcomes and action items.

**Additional Subtask Budget per Amendment No.1: \$10,534**

**SUBTASK SMC311.03: REGIONAL COLLABORATION SUPPORT**

From time to time the need has arisen for implementation of projects that are more efficiently and/or cost-effectively conducted via a collaboration among MRP Permittees from the various Bay Area counties. However, with the recent dissolution of BASMAA, the mechanism of providing budget directly to BASMAA for funding such regional collaborative efforts is no longer available. As an alternative, SMCWPPP and/or San Mateo County Permittees may wish to participate in future regional projects by providing in-kind services through EOA staff or subcontractors. This subtask provides the Program

Manager with the option to approve, on an as-needed basis, such in-kind participation in any regional collaborative projects that may arise. Please note that support for any water quality monitoring and/or POCs related regional projects may be provided separately under a similar subtask in EOA's WY 2022 Water Quality Monitoring scope of services for C/CAG.

This subtask may also include support related to meetings of the proposed new BASMAA Steering Committee or equivalent, including reviewing agenda items and providing comments as needed, and participation in selected meetings or portions of meetings.

Budget under this subtask will only be expended with prior authorization from the Program Manager.

**Deliverables:**

- In-kind participation in regional collaborative project(s), as needed and authorized by the Program Manager.
- Review and comment on agenda packages and participation in selected monthly BASMAA Steering Committee meetings or portions of meetings.

**Placeholder Budget: \$15,000** (additional budget details will be developed as part of any authorization from the Program Manager to expend budget under this subtask)

Amendment No. 1 Additional Scope:

EOA will support C/CAG staff with participating in the Steering Committee of the Bay Area Municipal Stormwater Collaborative (BAMSC), including reviewing agenda packages and meeting summaries and providing comments as needed.

**Amendment No. 1 Additional Deliverables:**

- One EOA manager will prepare for and attend the remaining FY 2021/22 BAMSC meetings.

**Additional Subtask Budget per Amendment No.1: \$8,272**

**SUBTASK SMC311.04: COORDINATION AND INTEGRATION**

This subtask addresses the need for general support activities not covered by other subtasks, many of which are related to optimizing coordination and integration among all permit compliance related activities performed by C/CAG staff and its consultants. As needed, EOA will continue to coordinate with the Program Manager and other C/CAG municipal stormwater permit compliance consultants via meetings, conference calls and emails. As directed by the Program Manager, EOA will also perform peer reviews of selected draft documents prepared by other permit compliance support consultants. In addition, EOA will work with the Program Manager to complete the annual update of EOA's tasks and budgets. This subtask also includes other types of miscellaneous support (e.g., grant applications), as needed and feasible within the available budget.

**Deliverables:**

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

**Budget: \$14,096**

**Amendment No. 1 Additional Scope:**

This subtask will help to optimize coordination and integration among C/CAG consultants. As directed by C/CAG staff, EOA will assist with coordination/management of other C/CAG consultants. EOA will also perform peer reviews of selected draft documents prepared by other C/CAG consultants, as needed and directed by C/CAG staff.

**Amendment No. 1 Additional Deliverables:**

- As directed by C/CAG staff, assist with coordination/management of other C/CAG consultants.
- As directed by C/CAG staff, develop comments on selected draft documents prepared by other C/CAG consultants.

**Additional Subtask Budget per Amendment No.1: \$18,360**

**SUBTASK SMC311.05: PERMIT RE-ISSUANCE SUPPORT**

EOA will continue to support the Countywide Program during the process to reissue the MRP. The current version, which is referred to as MRP 2.0, expired December 2020 but was administratively extended. The reissued permit is referred to as MRP 3.0. During FY 2021/22, tasks will include:

- Preparing for and facilitating the MRP 3.0 trash load reduction workgroup meetings (shared budget: one-third SMCWPPP and two-thirds Santa Clara Valley Urban Runoff Pollution Prevention Program, or SCVURPPP).
- Preparing for and facilitating the MRP 3.0 water quality monitoring workgroup (shared budget: one-third SMCWPPP and two-thirds SCVURPPP).
- Participating in the MRP 3.0 mercury and PCBs controls workgroup meetings on behalf of San Mateo County Permittees.
- Reviewing the Tentative Order of the reissued permit and assisting with preparation of comments.
- Summarizing important changes in the Tentative Order compared to MRP 2.0 and implications for Permittee compliance activities.



Other potential FY 2021/22 tasks to be conducted on an as needed basis (with approval from the Program Manager) include:

- Participating in other regional or countywide workgroups focusing on priority permit compliance areas (e.g., Provisions C.4/5).
- Preparing summary/status documents and presentations for the Stormwater Committee.
- Facilitating special meetings of the Stormwater Committee's Permit Implementation Workgroup to receive feedback on key reissuance issues.
- Participating in a regional MRP reissuance Steering Committee on behalf of SMCWPPP.
- Participating in Regional Water Board workshops and hearings related to permit reissuance.
- Preparing talking points for Permittee representatives participating in Regional Water Board permit reissuance hearings.
- Participating in other meetings with other Bay Area countywide stormwater programs and/or Regional Water Board staff, as needed.
- Working with Regional Water Board staff on any proposed requirements to address old industrial areas and/or retrofitting GI in urban areas.

**Deliverables:**

- Facilitation of the MRP 3.0 trash load reduction and water quality monitoring workgroups (shared budgets: one-third SMCWPPP and two-thirds SCVURPPP).
- Participation in the MRP 3.0 mercury and PCBs controls workgroup meetings on behalf of San Mateo County Permittees.
- Review of the Tentative Order of the reissued permit and assisting with preparation of comments. Summarizing important changes in the Tentative Order compared to MRP 2.0 and implications for Permittee compliance activities.
- Other potential FY 2021/22 tasks related to permit reissuance to be conducted on an as needed basis (with approval from the Program Manager).

**Budget: \$78,400**

Amendment No. 1 Additional Scope:

As needed, EOA will provide additional support to the Countywide Program during all facets of the process to reissue the MRP.

**Amendment No. 1 Additional Deliverables:**

- As directed by C/CAG staff, additional tasks related to permit reissuance to be conducted on an as needed basis.

**Additional Subtask Budget per Amendment No.1: \$22,900**

#### **SUBTASK SMC311.06: TRANSITIONAL SUPPORT AS NEEDED AND DIRECTED BY C/CAG**

This subtask addresses any need for support activities not covered by other subtasks. As needed and directed by C/CAG staff, EOA will conduct tasks and provide assistance in relation to the Program Manager transition.

##### **Deliverables:**

- As needed and directed by C/CAG staff, EOA will conduct tasks and provide assistance in relation to the Program Manager transition.

**Budget: \$67,916**

## **TASK SMC312 – SUBCOMMITTEE SUPPORT**

SMCWPPP's subcommittees provide regular forums for engagement with San Mateo County Permittee staff on key permit implementation issues. During FY 2021/22, EOA will continue to assist with planning and facilitating subcommittee/workgroup meetings, including working with chairs to develop agendas and discussion materials, participating in meetings, developing and giving presentations on technical and regulatory information, and preparing meeting summaries. Most SMCWPPP subcommittees are chaired by a staff from one of the San Mateo County Permittees who volunteered for the position. EOA will continue to work with subcommittee chairs to develop meeting agendas so that the meetings will address the most critical aspects of MRP compliance from the municipal staff viewpoint.

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

#### **SUBTASK SMC312.01: MUNICIPAL MAINTENANCE SUBCOMMITTEE**

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

EOA will facilitate semi-annual (twice per year) meetings of the Municipal Maintenance Subcommittee, including working with the chair to develop meeting agendas, prepare meeting materials (e.g., handouts and presentations), participate in the meetings, and prepare meeting summaries that include any action items agreed upon during the meeting. Municipal Maintenance Subcommittee meetings are typically one hour and held over lunchtime. A portion of the meeting time is dedicated to information sharing, an important function for this subcommittee. Maintenance staff from the various municipal agencies in San Mateo County ask questions, share problems and solutions, discuss issues, and share important information and feedback at the meetings. During the meetings, EOA will also provide updates on the MRP reissuance process, with a focus on Provision C.2.

Between meetings, EOA will provide on-call assistance to municipal staff by responding to their emails and telephone calls, communicate pertinent information to the subcommittee via email (e.g., training

opportunities external to the Countywide Program), and maintain the subcommittee contact list. In addition, under this subtask EOA will prepare the content for the section of the SMCWPPP Annual Report that addresses MRP Provision C.2 and conduct the annual update of the related sections of EOA's scope of work and budget.

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

Regional Water Board staff is currently proposing changes to Provision C.2 in the reissued MRP (MRP 3.0). These proposed changes are related to submitting BMP documentation (e.g., guidance material, SOPs) once during the permit term and providing training. Depending on the final MRP 3.0 requirements, and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in Provision C.2 of the reissued MRP.

**Deliverables:**

- Facilitation of semi-annual (twice per year) Municipal Maintenance Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the subcommittee of pertinent information, and updates to the subcommittee contact list.
- Guidance materials for implementation of new requirements in Provision C.2 of MRP 3.0 (depending on the final reissued MRP requirements and when the reissued permit is adopted).
- SMCWPPP Annual Report content addressing MRP Provision C.2, and annual update of the related sections of EOA's scope of work and budget.

**Budget: \$12,042**

**SUBTASK SMC312.02: NEW DEVELOPMENT SUBCOMMITTEE**

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

Peter Schultze-Allen, CPSWQ, QSP/QSD, RQP, will continue to serve as EOA's lead for facilitation of the NDS and related work under this subtask. Jill Bicknell, P.E., will continue to assist Peter with facilitating the NDS, especially by bringing knowledge and experience from the similar role she plays with the SCVURPPP. Kristin Kerr, P.E. will also provide technical assistance on construction-related topics and as EOA's lead for the SMCWPPP Municipal Maintenance Subcommittee will coordinate on GI maintenance.

EOA will continue to facilitate quarterly NDS meetings, including working with the chair to develop meeting agendas, preparing meeting materials (e.g., handouts and presentations), participating in the meetings, and preparing meeting summaries that include any action items agreed upon during the meeting. Between meetings, EOA will continue to provide on-call assistance to municipal staff by responding to their emails and telephone calls, communicate pertinent information to the NDS via email (e.g., training opportunities external to the Countywide Program), and maintain the NDS contact list. EOA staff will also participate on behalf of San Mateo County Permittees in the BASMAA Development Committee (or the anticipated equivalent committee that will remain following the dissolution of BASMAA as 501(c)(3) non-profit organization) and other pertinent committee and workgroup meetings (e.g., Biotreatment Soil Media Tree-Design Work Group). In addition, EOA will prepare the content for the section of SMCWPPP's Annual Report that addresses MRP Provisions C.3, C.6 and C.13.a. and conduct the annual update of the related sections of EOA's scope of work and budget.

At the NDS meetings, EOA will assist Permittee staff with questions and issues related to implementation of their GI Plans. EOA will continue to update development project review checklists, update biotreatment soil media specification information and guidance, develop/update biotreatment area wood mulch specification information and guidance (coordinated with other regional stakeholders), and print copies of the construction inspection forms and other materials as needed to assist the Permittees. EOA will also continue to submit an annual report to the County Mosquito Abatement District on behalf of the Permittees (submitted each year by September 30). In addition, updates to the development-related pages on the Countywide Program website will continue to be submitted to C/CAG staff as needed.

Regional Water Board staff is currently proposing changes to Provision C.3 of MRP 3.0 compared to MRP 2.0. At this time, there are no major proposed changes to Provisions C.6 and C.13.a. The proposed changes for provision C.3 are related to regulated projects, GI implementation, reporting, alternative compliance, and special projects. During the NDS meetings, EOA will also work with the Program Manager to provide updates on the MRP reissuance process, with focus on Provisions C.3, C.6, and C.13.a. Depending on the final reissued MRP requirements, and when the reissued permit is adopted, the NDS may begin working on guidance materials for implementation of new requirements in Provision C.3 of the reissued MRP.

During FY 2021/22, EOA will also continue to assist with any updates needed to the Countywide Program's guidance documents, including completing any further minor updates needed to the C.3 Regulated Projects Guide (C3RPG, Version 1.0, February 2020) to make it consistent with any updates made by other C/CAG consultants to the Green Infrastructure Design Guide (GIDG, Second Edition, 2020). In general, EOA will support other C/CAG consultants as needed in their efforts to update the GIDG as needed.

**Deliverables:**

- Facilitation of quarterly NDS meetings, including developing agendas, other meeting materials, and meeting summaries. Updating NDS members on the MRP reissuance process, with focus on MRP Provisions C.3, C.6, and C.13.a.
- On-call communications with municipal staff, periodic communications to the NDS of pertinent information, and updates to the NDS contact list.
- Participation on behalf of San Mateo County MRP Permittees in the BASMAA Development Committee or equivalent.
- Guidance materials for implementation of new requirements in Provision C.3 of MRP 3.0 (depending on the final reissued MRP requirements and when the reissued permit is adopted).
- Countywide Program Annual Report content for the section addressing MRP Provisions C.3, C.6 and C.13.a., and the annual update of the related sections of EOA's scope of work and budget.
- Printing of construction inspection forms for Permittees.
- Revisions to development guidance documents and materials, including any further updates to the C3RPG as part of supporting further updates of the GIDG made by other C/CAG consultants.
- Biotreatment soil media specification updates and guidance (coordinated with other Bay Area stormwater management programs and customized for SMCWPPP as needed).
- Biotreatment area wood mulch specification development/updates and guidance (coordinated with other regional stakeholders).
- Annual Report to the County Mosquito Abatement District.
- Updates to the development-related pages on the Countywide Program website submitted to C/CAG staff as needed.

**Budget: \$88,892**

**SUBTASK SMC312.03: COMMERCIAL/INDUSTRIAL/ILLICIT DISCHARGE SUBCOMMITTEE**

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

Individual cities and the County continue to develop and modify the different aspects of their MRP Provision C.4 Commercial and Industrial business inspection programs, including inspector staffing (e.g., municipal, contractors, or other agency), data management, cost recovery, Business Inspection Plans (BIPs) (e.g., priorities and frequencies), Enforcement Response Plans (ERPs), and outreach materials. The CII Subcommittee provides an important forum for communication among individual San Mateo County Permittees on their inspection programs, with overall support provided by the Countywide Program. In addition, a portion of the CII meeting time is dedicated to general information sharing. Municipal staff typically ask and answer questions, share problems and solutions, discuss issues, and share important information and feedback among themselves. The CII Subcommittee may also request that the

Countywide Program revises current inspection forms, data tracking tables, the BIP template, and/or ERP template, based on the development of their individual programs. During the meetings, EOA will also provide updates on the MRP reissuance process, with focus on Provisions C.4 and C.5.

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

We anticipate that in FY 2021/22 the CII Subcommittee will continue to request assistance from the Countywide Program with developing improved stormwater BMP outreach materials for commercial and industrial businesses and conducting additional outreach to mobile businesses. The assistance may also include subcontracting for translating outreach materials into other languages and printing materials. Outreach to mobile businesses will continue to be coordinated with SMCWPPP's PIP Subcommittee. In addition, Regional Water Board staff is currently proposing changes to Provisions C.4 and C.5 of MRP 3.0 compared to MRP 2.0. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.

EOA will continue to facilitate quarterly CII Subcommittee meetings, including working with the chair to develop meeting agendas, prepare meeting materials (e.g., handouts and presentations), participate in the meetings, and prepare meeting summaries that include any action items agreed upon during the meeting. Between meetings, EOA will provide on-call assistance to municipal staff by responding to their emails and telephone calls, communicate pertinent information to the CII Subcommittee via email (e.g., training opportunities external to the Countywide Program), and maintain the CII Subcommittee contact list.

EOA will also prepare the content for the section of the Countywide Annual Report that addresses MRP Provisions C.4, C.5, and C.13.b and c., and conduct the annual update of the related sections of EOA's scope of work and budget. In addition, EOA will periodically provide the webmaster with the information needed to update the business inspector and illicit discharge contact lists that reside on the Countywide Program's website and the mobile business enforcement action table and regional inventory on the CII section of the password protected portion of the website. EOA will also work with the CII Subcommittee to revise current inspection forms, data tracking tables, the BIP template, and/or the ERP template, and to conduct additional outreach to mobile businesses, and/or develop/update BMPs for commercial, industrial, or mobile businesses.

**Deliverables:**

- Facilitation of quarterly CII Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the CII Subcommittee of pertinent information, and updates to the CII Subcommittee contact list.

- Guidance materials for implementation of new requirements in Provisions C.4 and C.5 of MRP 3.0 (depending on the final reissued MRP requirements and when the reissued permit is adopted).
- Countywide Annual Report content for the section addressing MRP Provisions C.4, C.5, and C.13.b and c., and the annual update of the related sections of EOA's scope of work and budget.
- Updates as appropriate to the business inspector and illicit discharge contact lists, mobile business enforcement action table, mobile business inventory, inspection forms, data tracking tables, BIP template, and ERP template.
- Additional outreach to mobile businesses (in coordination with SMCWPPP's PIP Subcommittee), as appropriate. Develop inventory, enforcement strategy and BMPs for new categories of mobile businesses, as needed.
- Develop, update, translate, and/or print BMP outreach materials for commercial, industrial, and mobile businesses and residents, as needed.

**Budget: \$39,184**

#### **SUBTASK SMC312.04: TRASH SUBCOMMITTEE**

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

EOA will continue to facilitate quarterly Trash Subcommittee meetings, including preparing meeting agendas and other materials (e.g., handouts and presentations), participating in the meetings, and preparing meeting summaries that include any action items agreed upon during the meeting. During the meetings, EOA will also provide updates on the MRP reissuance process, with focus on Provision C.10.

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

Regional Water Board staff is currently proposing changes to Provision C.10 of MRP 3.0. Depending on the final reissued MRP requirements and when the reissued permit is adopted, the subcommittee may begin working on guidance materials for implementation of new requirements in the reissued MRP.

**Deliverables:**

- Facilitation of quarterly Trash Subcommittee meetings, including developing agendas, other meeting materials, and meeting summaries.
- On-call communications with municipal staff, periodic communications to the Trash Subcommittee of pertinent information, and updates to the Trash Subcommittee contact list.
- Countywide Program Annual Report content for the section addressing MRP Provision C.10., and the annual update of the related sections of EOA's scope of work and budget.
- Updates as needed to the trash control related pages on the Countywide Program website.
- Guidance materials for implementation of new requirements in Provision C.10 of MRP 3.0 (depending on the final reissued MRP requirements and when the reissued permit is adopted).

**Budget: \$21,200**

**SUBTASK SMC312.05: WATERSHED ASSESSMENT AND MONITORING SUBCOMMITTEE**

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

EOA will facilitate one annual WAM Subcommittee meeting during FY 2021/22, including working with the chair to develop the meeting agenda, preparing meeting materials (e.g., handouts and presentations), participating in the meeting, and preparing a meeting summary that includes any action items agreed upon during the meeting. The meeting will be held early during calendar year 2022 so that the most important outcomes to be reported in the Urban Creeks Monitoring Report (UCMR), which is due March 31, 2022, can be discussed. Outside of the meeting, EOA will provide on-call assistance to municipal staff by responding to their emails and telephone calls, communicate pertinent information to the subcommittee via email, seek feedback as needed on certain activities such as selecting targeted monitoring sample station locations and implementing local and regional SSID studies, and maintain the subcommittee contact list. It should be noted that the section of the Countywide Program's Annual Report that addresses MRP Provision C.8 simply refers to Provision C.8 deliverables (e.g., Urban Creeks Monitoring Report and Pollutants of Concern Monitoring Report) that are budgeted for separately in EOA's scope of services for Water Quality Monitoring.

**Deliverables:**

- Facilitation of one annual WAM Subcommittee meeting, including meeting agenda, other meeting materials, and meeting summary.



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

**Budget: \$5,386**

**SUBTASK SMC312.06: PARKS MAINTENANCE AND INTEGRATED PEST MANAGEMENT (IPM) WORKGROUP**

EOA will support one meeting of the Countywide Program's Parks Maintenance and IPM (PM&IPM) Workgroup, with a focus on compliance with MRP Provision C.9. This workgroup provides a forum for San Mateo County Permittees to share information related to implementing pesticide toxicity controls. Historically, the workgroup has mostly been attended by parks maintenance staff and focused on pest management issues in municipal parks and other areas in the public right-of-way with landscaping.

However, the overall focus of MRP Provision C.9 (Pesticides Toxicity Control) is broader and includes the following requirements:

- Maintain and Implement an IPM Policy or Ordinance and Standard Operating Procedures (C.9.a).
- Train Municipal Employees (C.9.b).
- Require Contractors to Implement IPM (C.9.c). It should be noted that MRP 2.0 includes additional focus on pesticides that are used for structural pest control, e.g., addressing pests such as rodents, ants, and cockroaches in municipal buildings.
- Interface with County Agricultural Commissioners (C.9.d).
- Public Outreach (C.9.e).
- Track and Participate in Relevant Regulatory Processes (C.9.f).
- Evaluate Implementation of Pesticide Source Control Actions (C.9.g).

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

EOA will facilitate one PM&IPM Workgroup meeting during FY 2021/22, including working with the chair to develop the meeting agenda, preparing meeting materials (e.g., handouts and presentations), participating in the meeting, and preparing a meeting summary that include any action items agreed upon during the meeting. During the meeting, EOA will also provide an update on new requirements in MRP 3.0 compared to MRP 2.0. EOA will also continue to provide on-call assistance to municipal staff by responding to their emails and telephone calls, communicate pertinent information to the PM&IPM Workgroup via email (e.g., training opportunities external to the Countywide Program), and maintain the PM&IPM Workgroup contact list. In addition, EOA will prepare the content for the section of the Countywide Annual Report that addresses MRP Provision C.9 and conduct the annual update of the related sections of EOA's scope of work and budget.

**Deliverables:**

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

**Budget: \$5,088**

## **TASK SMC313 – TRAINING**

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

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

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

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

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

#### **SUBTASK SMC313.01: BUSINESS INSPECTION AND ILLICIT DISCHARGE TRAINING PROGRAM**

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

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

Since each municipality has a BIP and ERP that are specific to its jurisdiction it would be challenging to provide a Countywide Program training on these topics. EOA has provided updated guidance material to the CII Subcommittee on how to meet the annual training requirements via a self-training and document for annual reporting. Other ideas on how to incorporate these topics into a Countywide Program training include providing the municipal specific BIPs and ERPs to workshop attendees for review (e.g., during the lunch break) or incorporating these documents into a group exercise that requires attendees to review the documents and compare content to other municipalities.

MRP regulatory context generally plays a secondary role at trainings. The focus of the trainings is generally on inspection procedures and BMPs. However, depending on the adoption status of MRP 3.0, the focus of this fiscal year's training will be on changes in Provision C.4 and C.5 requirements compared to MRP 2.0. Municipal staff has also requested workshop topics related to the State Industrial Stormwater General Permit. Since SMCWPPP is a CWEA approved training organization, municipal inspectors can receive continuing education hours needed to keep certifications current.

For the past several years, SMCWPPP has assisted municipalities meet the annual MRP training requirement by conducting an annual CII training, alternating in-person, half-day training workshops with smaller focused training activities. The last training workshop was budgeted for FY 2019/20 and held in September 2020. During FY 2021/22, EOA will work with the CII Subcommittee to hold a half-day training workshop. This workshop may be the first workshop after the adoption of MRP 3.0. Therefore, time and resources will be dedicated to providing guidance on the Provision C.4 and C.5 changes.

**Deliverables:**

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

**Budget: \$15,880**

**SUBTASK SMC313.02: NEW/REDEVELOPMENT AND CONSTRUCTION SITE MANAGEMENT TRAINING PROGRAM**

MRP 2.0 expanded the focus of Provision C.3 by including GI planning requirements in Provision C.3.j. and by linking it to implementation of GI in both private and public areas in Provisions C.10, C.11, and C.12 to reduce pollutant loadings to San Francisco Bay. EOA will work with the New Development Subcommittee (NDS) and Municipal Maintenance Subcommittee to design a training program that meets their needs and assists Permittees with MRP compliance. As Permittees implement their individual municipal GI Plans, new training needs may be identified. Additionally, as the new requirements of MRP 3.0 become apparent, the EOA will work with the NDS to identify new training materials as needed.

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

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

- GI Plan implementation mechanisms (C.3.j.);
- GI Plan integration with other municipal plans (C.3.j.);
- Design review of GI projects and use of the Green Infrastructure Design Guide (C.3.j.);
- Typical GI detail development and use and updates to the C.3 Regulated Projects Guide (C.3.j.);
- Compliance review of regulated projects (C.3);
- Inspection of LID systems during construction (C.3);

- Parks, landscaping, and urban forestry opportunities for LID (C.3);
- New approaches and technologies for LID and GI (C.3);
- Inspection of LID systems at the completion of construction and on-going (C.3.h.);
- Requirements for third-party inspections of vault-based systems (C.3.h.);
- Inspection and enforcement of construction phase controls with site visits and vendor demonstrations (C.6 and the statewide CGP);
- Field inspections and BMP demonstrations (C.6);
- Litter management at existing and new development projects (C.10);
- Architectural copper issues (C.13.a.);
- Maintenance of stormwater control measures and sustainable landscaping principles and practices, such as those from ReScape California; and
- Example projects and case studies.

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

- Workshop location coordinated;
- Workshop registration;
- Draft and final workshop flyer and agenda;
- Workshop materials (e.g., folders with various handouts including evaluation forms);
- Food catering services;
- Staffing of the workshop;
- Presentations by EOA staff and outside speakers;
- Field and/or classroom sessions as appropriate and recommended by the NDS;
- Summary of the completed evaluation forms; and
- Workshop materials submitted for posting on the Countywide Program's website.

**Deliverables:**

- Presentation at a CALBIG meeting on construction site controls.
- Facilitation of the FY 2021/22 annual C.6 construction site inspector training, which will be about a half-day workshop.
- Facilitation of the FY 2021/22 annual C.3 training, which will be about a six-hour workshop. This subtask also includes budget for conducting the FY 2020/21 annual C.3 training, which was postponed until August 2021.

**Budget: \$56,574**

**SUBTASK SMC313.03: PESTICIDE TOXICITY REDUCTION TRAINING PROGRAM**

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

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

During FY 2021/22, EOA will work with the PM&IPM Workgroup to plan and conduct a half- day landscape IPM training workshop. The Landscape IPM workshop will include guest speakers from vendors, local pest control contractors implementing IPM, and/or the UC Cooperative Extension. Example topics will include pesticides and water quality, update on MRP 3.0 requirements, new IPM techniques for pest control, information on alternatives to pesticides of concern, respirator regulatory refresher, and online pesticide use reporting.

**Deliverables:**

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

**Budget: \$10,796**

## TASK SM314 – TRASH LOAD REDUCTION

The development and implementation of stormwater trash control programs is a high priority component in the MRP. These programs are designed to significantly reduce trash and litter discharged from municipal stormwater systems and protect local creeks and San Francisco Bay. MRP 3.0 is anticipated to stipulate challenging trash reduction goals over an aggressive timeframe, potentially including the following:

- 2023 - 90% trash load reduction
- 2025 - 100% trash load reduction / “Low Trash Generation”

Additionally, the creditable trash load reduction actions will likely be modified/reduced in MRP 3.0, creating an increased need by San Mateo County municipalities to identify alternative compliance strategies to achieve these goals.

San Mateo County municipalities are striving to achieve trash load reduction goals through the cost-effective implementation of control measures. To assist municipalities in achieving the goals, EOA will continue to conduct tasks conducted in previous years and provide support on identifying additional cost-effective trash reduction strategies. The tasks described in this section will be conducted under the oversight of the Trash Subcommittee, a forum to share information on trash controls among San Mateo County Permittees, present approaches to compliance with trash reduction goals, and coordinate the implementation of MRP required studies and projects (see Subtask SMC312.04 above). Tasks that will be completed by EOA in FY 2021/22 include:

- Assisting with identifying cost-effective control measures, and updating and implementing long-term Trash Reduction Plans, including revising baseline trash generation and trash full capture maps;
- Identifying optimal locations for trash full capture devices;
- Conducting effectiveness assessments for existing source control actions (i.e., single use plastic bag bans and polystyrene food ware bans) and characterizing the types and magnitudes of trash found in stormwater;
- Supporting the Litter Work Group, which focuses on reducing the stormwater impacts of illegal dumping and inadequate waste management practices in San Mateo County;
- Developing and implementing trash assessment strategies, including conducting on-land visual trash assessments (OVTAs) for San Mateo County Permittees and managing OVTA data in a centralized data management system;
- Annual reporting and data collection guidance and assistance for reporting trash reductions associated with creek and shoreline cleanups at hot spots and other locations;
- Calculating and reporting trash load reductions to the Regional Water Board in compliance with the MRP;
- Revising the OVTA program to incorporate revisions consistent with MRP 3.0.

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

#### **SUBTASK SMC314.01: LONG-TERM TRASH LOAD REDUCTION PLAN SUPPORT**

During this permit term, EOA has provided guidance on long-term trash planning, including trash mapping and data management services, and revisions to trash generation, full capture system, and hot spot GIS data layers. During FY 2021/22 EOA will continue to:

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

#### **Deliverables:**

- On-call guidance and participation in meetings/calls to discuss long-term plan implementation, provide perspectives on control actions for trash management, and discuss assessment results and other pertinent topics.
- Updated/revised trash generation and full capture system maps and GIS data layers in preparation for FY 2021/22 Annual Report submittals.

**Budget: \$47,436**

#### **Amendment No. 1 Additional Scope:**

EOA will assist the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) via C/CAG with identifying potential locations for large (high-flow capacity) trash full capture systems and developing conceptual designs and cost estimates to support potential funding agreements with Caltrans. This project will assist SMCWPPP member agencies with addressing stormwater trash reduction targets mandated by the MRP for stormwater discharges in the San Francisco Bay Area and provide the planning necessary to identify trash full capture projects that could receive funding from Caltrans to support the installation of these systems.

#### *Background*

In 2018, the Regional Water Board requested that MRP Permittees provide locations/opportunities where trash full capture systems could potentially be installed to address Permittee and Caltrans trash generating areas. EOA conducted a county-wide desktop analysis for SMCWPPP to identify potential locations/opportunities. The results were submitted to the Regional Water Board, who subsequently forwarded them to Caltrans, who subsequently used the results to identify funding priorities for collaborative trash capture projects in San Mateo County.



The list of locations/opportunities developed in 2018 has generally been exhausted. A number of large trash full capture systems have been constructed or are planned for construction at locations identified via this 2018 analysis. The construction of these systems has benefited both Permittees and Caltrans towards achieving their mandated trash load reduction goals. Additionally, many locations were identified as infeasible or not directly associated with Caltrans right-of-way (ROW). The 2018 analysis however was not exhaustive, as it did not consider areas already treated by small (inlet-based) trash full capture systems or drainage areas less than 30 acres in size.

Caltrans continues to request additional locations from Bay Area cities/counties where large trash full capture systems can be constructed and is willing to provide funding towards the construction of these devices should they address significant trash generating areas with Caltrans' ROW. Caltrans prefers to fund large-scale capture systems instead of small (inlet-based) devices due to the lifespan of the small devices and maintenance concerns with placing small devices in Caltrans' ROW. To date, SMCWPPP member agencies have largely installed small (inlet-based) devices to achieve mandated trash reduction goals.

### *Scope of Work*

This project would expand the analysis conducted in 2018 by EOA in an attempt to identify feasible locations for large (high-flow capacity) systems within San Mateo county. The analysis will expand the 2018 analysis to include trash generating areas within SMCWPPP member agency jurisdictional areas that are currently addressed by small (inlet-based) full capture devices, address catchment areas greater than 20 acres, and drain significant trash generating areas identified by Caltrans. The analysis will include conducting desktop approaches, in collaboration with SMCWPPP Permittee staff, to identify potential locations where large full capture systems could be installed and address both Permittee and Caltrans trash reductions goals. Field work to ground-truth locations identified via the desktop analysis will be conducted. Conceptual designs and sizing of systems verified in the field as potentially feasible will also be conducted to further facilitate the planning for large capture system construction in San Mateo county.

EOA will provide assistance to SMCWPPP (via C/CAG) by completing the tasks described in this section. Cost estimates for each task are included at the end of this scope of work in Table 1.

#### *Task 1. Desktop Analysis and Preliminary Site Identification*

As a first step in the project, EOA will conduct a county-wide desktop analysis to identify potential locations of sites where large (high-flow capacity) trash full capture systems may be feasible to construct and maintain. The desktop analysis will utilize existing GIS data layers depicting member agency baseline trash generation levels, storm drain conveyances, land elevations, water bodies, existing and planned trash full capture systems, Caltrans ROW and significant trash generating areas, and other applicable information. The desktop analysis will focus on locations that drain moderate, high, or very high trash generating areas within member agency jurisdictional areas that are not already treated (or planned for treatment) by large full capture systems; and drain Caltrans ROW and significant trash generating areas depicted in Caltrans data layers. As an outcome of this task, EOA will develop a list and GIS data layers of all potential locations identified, as well as estimated drainage areas, member agency and Caltrans trash generating areas addressed, and trash load reduction benefits. The list and GIS data layers will serve as the starting point for reviewing and discussing these locations with member agency staff and further exploration during Task 2. The budget for Task 1 is \$25,667.

*Task 2. Communication with Member Agencies and Field Visits to Preliminary Sites*

After the completion of Task 1, EOA will contact staff from each SMCWPPP member agency where potential locations for large full capture systems were identified through the desktop analysis (Task 1). EOA will facilitate calls/meetings with each applicable member agency to review and discuss the locations identified and receive input from member agency staff. The budget assumes that locations in the jurisdictional areas of roughly 10 member agencies will be identified during Task 1. Additionally, it is assumed that each meeting/call (roughly 10 in total) will be approximately one-hour each.

Based to the input provided by member agency staff, EOA will develop a refined list of potential locations for large full capture systems. This refined list will be used to conduct field work, meant to further the evaluation and ground-truthing of the list of sites. Field work conducted at each site on the refined list will entail preparing for and visiting the location of each potential site, and documenting site-specific conditions, including constraints. The condition of existing stormwater system infrastructure, dimensions for device sizing and appropriate device type/model selection, and potential compatibility, restoration, upgrade, or retrofitting work that would be necessary to install trash capture devices at these sites will be documented. Additionally, an evaluation of whether there is adequate space in the right-of-way to install a trash capture device and whether there is adequate space for routine maintenance activities (typically via a vacuum system) will be conducted. Underground and overhead utility conflicts or constraints that could complicate trash capture device installation and maintenance will also be documented. Please note this task does not include detailed utility investigations, which will be included in the conceptual design work included in Task 3. Alternative locations, if applicable, will also be visited during the field work as budget allows. For budgeting purposes, we estimate that roughly two, eight-hour days of fieldwork will be needed at approximately 15 sites. This task will result in a final list of locations for large trash capture systems in San Mateo County. The budget for Task 2 is \$27,787.

*Task 3. Conceptual Designs and Cost Estimates for Likely Feasible Sites*

Once the refined list of proposed locations for large trash full capture systems is developed based on fieldwork conducted via Task 2, EOA will perform a simplified hydrological analysis based on the 1-year, 1-hour storm for the drainage area associated with each proposed location to determine the peak flow rate, which will help determine the size of the system needed to achieve “full capture.” In addition, each site will be analyzed for the County’s drainage standard level of service (10-year or 25-year depending on the drainage area) to ensure that the proposed device has a bypass to handle the 10-year or 25-year storm and note the potential increased hydraulic grade due to the proposed device. Based on the hydrological analysis, EOA will identify types and configurations/designs, treatment areas, trash reduction benefits, preliminary capital and annual operation and maintenance costs, and site-specific considerations for each potential large full capture system location. This information will be provided in a brief “fact sheet” for each system location, along with conceptual designs/drawings (11x17) in pdf. The fact sheet and design/drawing will be designed to assist with further dialogue between member agencies and Caltrans. The conceptual designs/drawings will include the drainage area to the device, flow rate, recommended device, and other pertinent information. Additionally, a cut sheet of specific devices for each location will be provided as an attachment to the fact sheet. For budgeting purposes, we estimate that fact sheets and designs/drawings will be developed for approximately 10 sites. The budget for Task 3 is \$34,291.

**Amendment No. 1 Additional Deliverables:**

- Initial list (table or spreadsheet) and GIS data layers of all potential locations identified for large full capture systems, as well as estimated drainage areas, member agency and Caltrans trash generating areas addressed, and trash load reduction benefits.
- Refined list (table or spreadsheet) and GIS data layers of all potential locations identified for large full capture systems, based on discussions with member agency staff, as well as estimated drainage areas, member agency and Caltrans trash generating areas addressed, and trash load reduction benefits.
- Final list (table or spreadsheet) and GIS data layers of all potential locations identified for large full capture systems, based on field work, as well as estimated drainage areas, member agency and Caltrans trash generating areas addressed, and trash load reduction benefits.
- One draft and one final set of “fact sheets” for each system location, along with conceptual designs/drawings (11x17) in pdf that include the drainage area to the device, flow rate, recommended device, and other pertinent information. A cut sheet of specific devices for each location will be provided as an attachment to each fact sheet.

Please note that additional details about this subtask are provided in an EOA letter proposal dated July 27, 2021.

**Additional Subtask Budget per Amendment No.1: \$87,745**

**SUBTASK SMC314.02: LITTER WORKGROUP**

In 2013 the EOA project team assisted SMCWPPP with the development of the Litter Work Group, which is intended to provide a forum for sharing trash management information among San Mateo County Permittees, solid waste haulers, county recycling and waste management program staff, and other stakeholders. During this permit term, EOA has continued to coordinate and facilitate Litter Work Group meetings, develop annual workplans, conduct annual roundtable workshops, and implement high priority tasks recommended by the Litter Work Group and/or the SMCWPPP Trash Subcommittee. Consistent with the FY 2021/22 Litter Work Group workplan, during FY 2021/22 EOA will:

- **Litter Work Group Coordination** – Facilitate two Litter Work Group meetings/calls. As part of this coordinator role, EOA will develop and distribute meeting agendas, prepare meeting materials as needed, participate in meetings, and prepare and distribute meeting summaries.
- **Coordination with Transportation Agencies** – Facilitate two coordination meetings with transportation agencies (e.g., Caltrans and Caltrain) on trash/litter issues and conduct follow up communications with agency staff (as needed) between and after the two meetings. As part of this coordinator role, EOA will develop and distribute meeting agendas, prepare meeting materials as needed, participate in meetings, and prepare and distribute meeting summaries.
- **Annual Roundtable Workshop** – Work with the Litter Work Group to hold a roundtable event for San Mateo County Permittees and other stakeholders. The event will include presenting and discussing opportunities for and barriers to enhanced coordination of trash control measure implementation. EOA will work with the Litter Work Group to select roundtable topics such as potentially using the results of the Trash Characterization Study to inform trash control measure

implementation, trash sources, trash control measure types, illegal dumping, and ongoing collaboration. The outcome of the roundtable will be determined in coordination with the Litter Work Group in accordance with the Litter Work Group workplan.

- **Stormwater Trash Characterization Study** – Work with the Litter Work Group to develop and finalize the study report for the characterization study. The draft report is planned to be completed in early FY 2021/22 and finalization is planned to occur by late 2021. The study focuses on evaluating the effectiveness of existing trash source control actions and filling information gaps on the dominant types of trash in stormwater runoff in San Mateo County. The data generated will inform future implementation of existing and future source control measures in San Mateo County.
- **Annual Workplan Development** – Work with the Litter Work Group to identify high priority tasks that should be conducted by SMCWPPP in FY 2022/23, to the extent that budget is available. After review by the Litter Work Group, a draft workplan will be distributed to the Trash Subcommittee for review.
- **Coordinate with Other Efforts** – Work with the Litter Work Group to continue to coordinate litter reduction and illegal dumping reduction efforts with the San Mateo Countywide Recycling Committee, the SMCWPPP PIP Subcommittee, the Thrive Alliance in San Mateo County, the Alameda County Illegal Dumping Task Force, the CalRecycle Illegal Dumping Technical Advisory Committee, the Santa Clara County Recycling and Waste Reduction Commission Technical Advisory Committee, and the Zero Litter Initiative in the Santa Clara Valley.

**Deliverables:**

- Facilitation of two Litter Work Group meetings, including preparation of meeting agendas, supporting materials, and meeting summaries.
- Facilitation of two coordination meetings with transportation agencies, including preparation of meeting agendas, supporting materials, and meeting summaries.
- Planning and facilitation of a roundtable workshop with San Mateo County Permittees and stakeholders to reduce litter and/or illegal dumping.
- Completion of one draft and one final trash characterization study report, documenting the results and conclusions of the study.
- Draft and final FY 2022/23 workplan for the Litter Work Group consistent with future needs and budgets.

**Budget: \$45,384**

**SUBTASK SMC314.03: TRASH LOAD REDUCTION ASSESSMENT PROGRAM**

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

towards trash load reduction goals included in the MRP. SMCWPPP incorporated the protocols into its 2014 *Pilot Trash Load Reduction Assessment Strategy* submitted to the Regional Water Board with the San Mateo County Permittee Long-term Trash Load Reduction Plans.

During FY 2021/22, EOA will continue to implement and manage the SMCWPPP Trash Load Reduction Assessment Program, which entails annually selecting OVTA sites, conducting trash assessments at a frequency of three times per year at each site, implementing appropriate quality assurance and control procedures, and managing assessment data via the OVTA database developed by EOA. Three assessments will be conducted at each of roughly 300 OVTA sites. These may include new OVTA sites established to address new requirements anticipated in MRP 3.0. OVTAs will be conducted during both the dry and wet seasons (to the extent possible). Assessment sites will be located in high priority trash management areas identified by San Mateo County municipalities. To the extent feasible, EOA will use trained interns or technicians to conduct these assessments to reduce costs. Additionally, EOA will coordinate with San Mateo County Permittees on all assessments and incorporate any assessment data collected by San Mateo County Permittees into the OVTA database system.

**Deliverables:**

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

**Budget: \$137,810**

**SUBTASK SMC314.04: TRASH HOT SPOT CLEANUP TRACKING AND REPORTING**

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

During FY 2021/22, EOA will continue to provide guidance to San Mateo County Permittees on hot spot selection, manage the data collected by San Mateo County Permittees during hot spot cleanups, and develop standardized reporting formats populated with historical and current hot spot data for each San Mateo County Permittee to satisfy annual reporting requirements. EOA will continue to provide guidance and tools to San Mateo County Permittees, including data collection and load removal calculation tools associated with creek and shoreline cleanup activities. The guidance and tools are intended to maintain the quality and consistency of data collected via cleanup activities by San Mateo County Permittees. EOA will also input all San Mateo County Permittee data into the existing SMCWPPP trash hot spot cleanup database and manage those data on behalf of all San Mateo County Permittees. EOA will use output from the database to populate the trash hot spot cleanup sections of San Mateo County Permittees’ trash load reduction annual report forms.

**Deliverables:**

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

**Budget: \$ 17,012**

**SUBTASK SMC314.05: ASSIST WITH ANNUAL REPORTING AND LOAD REDUCTION CALCULATIONS**

The MRP requires that Permittees report annually on progress towards trash load reduction goals (e.g., 80% by 2019). Local agencies that fail to demonstrate achievement and maintenance of the 80% goal may be subject to enforcement by the Regional Water Board or lawsuits by third parties. During the previous and current permit terms, EOA assisted all San Mateo County Permittees in demonstrating trash load reductions, resulting in determinations of compliance for nearly all San Mateo County municipalities. The accounting system used during the last permit term was revised during reissuance of the MRP (2.0), necessitating ongoing guidance and assistance on load reduction accounting during the current permit term.

During FY 2021/22, EOA will continue to provide technical support to all San Mateo County Permittees on annual reporting. EOA will assist with developing each San Mateo County Permittee's trash load reduction section of its Annual Report by providing guidance for completing Annual Report forms and developing load reduction calculations for full capture systems, institutional controls (via on-land assessment results), source control actions, and creek and shoreline cleanup offsets. For those municipalities that provide draft Annual Report sections by a certain date (to be determined), EOA will review the forms and provide comments, to the extent feasible within available budget.

**Deliverables:**

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

**Budget: \$36,806**

**Amendment No. 2 Additional Scope:**

During July – September 2022, EOA will continue to provide technical support to all San Mateo County Permittees on the trash load reduction aspects of their FY 2021/22 Annual Reports. EOA will assist with developing each San Mateo County Permittee's trash load reduction section of its Annual Report by providing guidance for completing Annual Report forms and developing load reduction calculations for full capture systems, institutional controls (via on-land assessment results), source control actions, and

creek and shoreline cleanup offsets. For those municipalities that provide draft Annual Report sections by a certain date (to be determined), EOA will review the forms and provide comments, to the extent feasible within available budget.

**Amendment No. 2 Additional Deliverables:**

- Updated guidance to San Mateo County Permittees for completing the trash load reduction section of their FY 2021/22 Annual Reports.
- Draft and final calculations of trash load reductions for each San Mateo County Permittee for each fiscal year and associated draft FY 2021/22 Annual Report sections.
- Comments on trash control sections of individual municipal FY 2021/22 Annual Reports as applicable and feasible within available budget.

**Additional Subtask Budget per Amendment No.1: \$36,806**

## TASK SM315 – MERCURY/PCBs LOAD REDUCTION AND GI TRACKING

MRP 2.0 included enforceable numeric load reduction performance criteria for mercury and PCBs. Thus, the development and implementation of control programs for these pollutants has become an increasingly high priority component for Permittees.<sup>2</sup> Jon Konnan will continue to lead this task. Subtask descriptions, deliverables and budgets are provided below.

### SUBTASK SM315.01: IDENTIFY MANAGEMENT AREAS AND CONTROL MEASURES

MRP 2.0 required Permittees to demonstrate implementation of mercury and PCBs control measures in areas where benefits are most likely to accrue (i.e., “focused implementation”). Provision C.12.a. required Bay-area wide PCBs load reductions during the MRP 2.0 compliance period (established later as FY 2013/14 through FY 2019/20) of 500 grams/year by June 30, 2018 and 3,000 grams/year by June 30, 2020.<sup>3</sup> The portions of these reductions required of San Mateo County Permittees, which were based on relative population, were 60 gram/year by June 30, 2018 and 370 gram/year by June 30, 2020. However, MRP 2.0 allowed Permittees to meet the regional criterion as a group – criteria for individual counties would only apply when the regional group criterion was not met.

The estimated PCBs loads reduced during the MRP 2.0 compliance period by both San Mateo County Permittees and all MRP 2.0 Permittees combined were described in SMCWPPP’s FY 2019/20 Annual Report. San Mateo County Permittees reported a PCBs load reduction by June 30, 2020 of 323 gram/year that fulfilled most (87%) but not all of their MRP 2.0 countywide criterion of 370 gram/year. However, the PCBs load reduction reported by June 30, 2020 by all MRP Permittees combined of 3,017 grams/year met the MRP regional performance criterion of 3,000 grams/year. Thus, all MRP Permittees, including San Mateo Permittees, were reported to have complied with this MRP 2.0 PCBs load reduction requirement.

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<sup>2</sup> For now, the general assumption will continue to apply that controls measures should be selected to reduce PCBs loads and the ancillary benefits of those measures in reducing mercury loads will be sufficient for addressing mercury.

<sup>3</sup> It is important to note that the latter requirement is distinct from the MRP 2.0 Provision C.12.c. requirement for a 3 kg/year Bay-area wide PCBs load reduction via GI by the year 2040.

This subtask will include assisting San Mateo County Permittees to continue tracking mercury and PCBs controls implemented in San Mateo County and the associated pollutant load reductions, as required by MRP 2.0. Taking credit for PCBs loads reductions associated with existing and planned activities such as redevelopment (and associated site abatement and C.3 treatment), contaminated site cleanups, and any enhanced stormwater conveyance cleanouts (e.g., channel dredging) in old urban (and especially old industrial) land uses remains an important part of achieving load reductions with optimal cost-effectiveness.

During FY 2021/22, EOA will continue to assist San Mateo County Permittees with the following tasks related to mercury and PCBs, as needed and feasible within the available budget:

- Continuing to work with municipal staff to update the types and locations of existing and new mercury and PCBs control measures (including GI and regional stormwater capture projects) and the associated pollutant load reductions.
- Quantifying mercury and PCBs load reductions using the interim accounting methodology (Permittees are required to annually report load reductions calculated for all applicable controls).
- Assisting C/CAG and Permittees with referring additional PCBs source properties to the Regional Water Board (e.g., 1411 Industrial Road in San Carlos), including completing the standard referral form and supporting documentation.
- Participating in regional POCs Steering Committee meetings, which provide a forum for information sharing and communication among staff from the Bay Area countywide stormwater programs, MRP Permittees, and Regional Water Board staff, or related meetings.
- Responding to any feedback from Regional Water Board staff on SMCWPPP's PCBs and Mercury Control Measures Plan that was submitted in September 2020 per the requirements of MRP Provisions C.11/12.d.
- Updating information on San Mateo County Watersheds Management Areas (WMAs) and associated mercury and PCBs control measures currently being implemented in the WMAs.
- Prioritizing WMAs, locations within WMAs, and types of controls for future implementation.
- Continue conducting analyses of WMAs to inform MRP 3.0 requirements, including estimated PCBs loadings, potential load reductions by existing and future control measures (including GI, trash full capture, and enhanced O&M), and potential areas to be treated to address moderate PCBs levels and associated PCBs load reductions.
- Assisting Permittee prepare to transition from MRP 2.0 to MRP 3.0 mercury and PCBs requirements.

Work that will be conducted under the Countywide Program's water quality monitoring component to identify pollutant source areas (i.e., Pollutant of Concern Monitoring) is closely related to this subtask. EOA will therefore integrate this subtask with implementation of Provision C.8.f. (see Subtask SMC317.05). Implementation of this subtask will also be informed by the Countywide Program's ongoing coordination of efforts to address mercury and PCBs with other Bay Area countywide stormwater management programs through the BASMAA Monitoring and Pollutants of Concern Committee (MPC) or equivalent.



**Deliverables:**

- Documentation submitted with the FY 2020/21 Countywide Program Annual Report of progress towards identifying priority PCBs control watersheds and management areas, specific control measures, and PCBs and mercury load reductions achieved this permit term as of June 30, 2021.
- Working with C/CAG and Permittee staff on all aspects of Provisions C.11/12 compliance and transitioning from MRP 2.0 to MRP 3.0, including as needed any of the tasks described above.

**Budget: \$32,176**

**Amendment No. 1 Additional Scope:**

A new sub-provision in the MRP will require Permittees to implement control measures in some portion of old industrial and/or other areas that generally have moderate to high PCBs concentrations. C/CAG staff is forming a workgroup of municipalities in San Mateo County that have the greatest extent of old industrial land use areas to explore how these jurisdictions could provide additional help addressing PCBs in old industrial land uses over the MRP 3 permit term. EOA will assist C/CAG staff to facilitate meetings of this Old Industrial Work Group (OIWG).

**Amendment No. 1 Additional Deliverables:**

- Facilitation of meetings of the OIWG, including coordinating meeting dates/times, preparation of agendas and other meeting materials, participation/presentations in meetings, and follow-up actions and communications as needed.

**Additional Subtask Budget per Amendment No.1: \$19,176**

**SUBTASK SM315.02: ASSIST WITH PROGRAM TO MANAGE PCBs DURING DEMO - DATA COLLECTION/EVALUATION**

MRP Provision C.12.f. (managing PCBs during building demolition) required development of a data collection and assessment methodology program by July 1, 2019 to quantify PCBs loads reduced through implementation of the new municipal programs for controlling PCBs during building demolition, which began implementation on that date. In accordance with Provision C.12.f.iii., EOA assisted SMCWPPP to work with other Bay Area stormwater management programs through BASMAA to develop a data management system and submit the data collection and assessment methodology with its FY 2019/20 Annual Report.

With additional assistance from EOA, last year C/CAG staff worked with San Mateo County Permittees to fulfill other closely related Provision C.12.f.iii. data collection and reporting requirements. Permittees submitted with their FY 2019/20 Annual Reports a running list of applicable structures that applied for a demolition permit and those that had materials with PCBs at 50 ppm or greater.

During FY 2020/21, EOA will continue to assist C/CAG staff with providing administrative and technical support to San Mateo County Permittees for their ongoing efforts to comply with the data collection and reporting requirements under C.12.f. EOA will also assist SMCWPPP and San Mateo County Permittees as needed to continue working with other Bay Area stormwater management programs to evaluate new data from the PCBs management during demolition programs as they become available and consider potential modifications to the programs and associated reporting. This will include addressing Regional

Water Board staff requests to the extent feasible. For example, Regional Water Board staff has requested that Permittees consider including further documentation of the abatement process at demolition sites with PCBs to help confirm overall program effectiveness.

**Deliverables:**

- Assistance to C/CAG staff with providing administrative and technical support to San Mateo County Permittees for their ongoing efforts by to comply with data collection and reporting requirements under MRP Provision C.12.f.
- Assistance with working with other Bay Area stormwater management programs as needed to evaluate new data from the PCBs management during demolition programs as they become available and consider potential modifications to the programs and associated reporting, including addressing Regional Water Board staff requests to the extent feasible.

**Budget: \$9,096**

**SUBTASK SM315.03: UPDATE OF GI TRACKING TOOL DATA AND QA/QC REVIEW DURING ANNUAL REPORTING**

The SMCWPPP GI Tracking Tool was developed by Paradigm Consultants (Paradigm) as part of the San Mateo Countywide Sustainable Streets Master Plan project. It tracks constructed GI projects in San Mateo County. EOA has been separately compiling data on San Mateo County GI projects in a spreadsheet database that includes constructed projects, and also some projects that are planned or under construction. EOA uses these data to calculate estimated PCBs and mercury loads reduced by GI (and has also occasionally projected potential future load reductions), which are reported annually as part of the SMCWPPP Annual Report, per requirements in MRP 2.0.

The GI Tracking Tool currently includes GI project data that were incorporated from the EOA spreadsheet database as of its update for the SMCWPPP FY 2018/19 Annual Report. It also includes GI Project boundaries that were automatically generated for projects with valid Assessor Parcel Numbers (APNs), a subset of all GI projects. All other projects are currently located by a single point.

Following the FY 2018/19 annual reporting update, EOA has continued to compile San Mateo County GI project data and enter it into the spreadsheet database. Currently, the database has GI project data collected through September 2020. In addition, during FY 2019/20 EOA completed a GI project boundary GIS layer for all constructed GI projects in the spreadsheet database. The GIS layer does not include boundaries for planned or under-construction projects included in the spreadsheet database.

EOA is conducting tasks to update the GI Tracking Tool in two phases: (1) short-term tasks early in calendar year 2021, which are described in a separate document, and (2) additional tasks during FY 2020/21 annual reporting, which are described below. Once the short-term updates are complete, from that point onwards new project data that become available will be entered into and stored in the GI Tracking Tool, rather than adding new data to the EOA spreadsheet database.

The annual reporting activities will be conducted July through September 2021 and, as in previous years, will include contacting each San Mateo County MRP Permittee to obtain data on new GI projects in their jurisdiction as needed and any revised or updated data on existing projects, including the data needed to calculate updated PCBs and Hg load reduction estimates. The tasks and budgets presented below

assume that Paradigm will be available to assist EOA with updating the GI Tracking Tool data and related efforts.

When contacting Permittees as part of FY 2020/21 annual reporting, EOA will gather all types of data needed for updating the GI Tracking Tool. EOA will work with Paradigm and C/CAG staff to identify any adjustments needed to the types of GI project data (and associated formats) requested from Permittees during this interim period before the upcoming reissuance of the MRP.

The data fields in the GI Tracking Tool may need to be revised as a result of the permit reissuance. EOA will keep this in mind during the interim updating process (e.g., we will avoid undue efforts for data that may not be needed in the long-term under MRP 3.0). A complete evaluation of the fields needed for the long-term in the GI Tracking Tool, and which of those fields are designated as required, should be completed after FY 2020/21 annual reporting has been completed and the permit reissuance process is nearing completion or complete.

All tasks described below will be informed by the SCVURPPP's similar efforts to track GI projects. EOA worked with Santa Clara Valley MRP Permittees to assist the SCVURPPP to develop an interactive on-line data portal on stormwater treatment measures in the Santa Clara Valley, which includes LID and GI projects constructed on private properties and in the public right-of-way.

As described previously, EOA facilitates the SMCWPPP New Development Subcommittee (NDS). EOA will keep NDS members informed about progress with the below tasks. EOA will include these progress reports as an item on the agendas for selected NDS meetings. This will provide the opportunity for EOA to periodically update the subcommittee on progress with the GI tracking process and solicit questions, comments, and any feedback from NDS members.

#### *Entering New Project Data into GI Tracking Tool*

EOA will continue to enter new project data obtained from Permittees into the GI Tracking Tool using the Data Upload Template. Selected data will subsequently be exported from the GI Tracking Tool to calculate updated pollutant load reduction estimates. In addition, as part of this process EOA will continue to develop project boundary polygons for new GI projects.

#### *Update of GI Tracking Tool C.3 Regulated Project Field*

The GI Tracking Tool includes a field for identifying whether a GI project is regulated under MRP Provision C.3. However, this field has not been populated in the GI Tracking Tool. Completing this field for all GI projects should be a priority since it is important (e.g., to Regional Water Board staff) to distinguish C.3-regulated from non-regulated, voluntary projects. EOA will work with Paradigm to populate this field as part of the GI project update during FY 2020/21 annual reporting.

EOA will initially assume that any project designated as both a Public Project and a Green Street Project is not C.3-regulated. EOA will assume that all other projects are parcel-based and will initially designate them as C.3-regulated. However, there may be parcel-based projects that are not C.3-regulated (e.g., a project on a municipal owned parcel that voluntarily added GI features to a city hall parking lot). EOA should be able to identify many of these projects by reviewing each Permittee's Green Infrastructure Plan (submitted in September 2019). EOA will follow-up with municipal representatives to confirm that the list of non-C.3-regulated parcel-based projects is complete for each Permittee.

### *General QA/QC Review of GI Tracking Tool*

The current draft version of the Data Upload Template includes GI project data, based upon Paradigm's initial attempt to migrate data from the EOA spreadsheet database (as of its update for the SMCWPPP FY 2018/19 Annual Report) into the new format.

Paradigm included the following readme text in the Data Upload Template: *"It is not expected that each agency QAs their projects/measures and provides an updated template at this time. However, it is envisioned that over time and before FY 20-21 reporting, the data will be reviewed and updated to provide a more accurate inventory."*

Without assistance and encouragement from SMCWPPP, some Permittees may neglect to conduct this review or may struggle to conduct it effectively, and the results would likely lack consistency among Permittees. Therefore, as part of the FY 2020/21 annual reporting process, EOA will assist each Permittee as needed with the review and update process. EOA will initially check with each Permittee regarding the status of its own review, if any. EOA will then review each record in the GI Tracking Tool, compare to the EOA spreadsheet database, and make revisions, working with Permittees as needed.

During the review and update process, EOA will also encourage Permittee staff to become familiar with the GI Tracking Tool and Data Upload Template, with a focus on maintaining complete and accurate data for their jurisdictions. The overall goal will be to set the stage for reducing the level of assistance needed from SMCWPPP in future years so that Permittees can use the GI Tracking Tool to add new projects and maintain GI data from their jurisdictions as independently as possible.

### **Deliverables:**

- Communication with each San Mateo County Permittee to obtain data on new GI projects and any updated data on existing projects;
- Identification of adjustments (compared to previous years) needed to the types of data (and associated formats) requested from Permittees;<sup>4</sup>
- Collection of data needed for calculating PCBs and mercury load reduction estimates and all other types of data needed to update the GI Tracking Tool in general;
- New project data obtained from Permittees entered into the GI Tracking Tool using the Data Upload Template;
- Export of selected data from the GI Tracking Tool to calculate updated pollutant load reduction estimates;
- Development of additional project boundary polygons for new GI projects;
- Addition of project boundaries to the GI Tracking Tool and existing boundaries revised as needed, with the goal of including reasonably accurate boundaries for all GI projects in the GI Tracking Tool;<sup>5</sup>

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<sup>4</sup> EOA will work with Paradigm and C/CAG staff on this task.

<sup>5</sup> Since the GI Tracking Tool currently does not include a user interface for adding/adjusting GI project boundaries, EOA staff will provide project boundary data directly to Paradigm staff to add to or replace existing data. C/CAG may wish to consider adding a project boundary user interface to the Tool so that in the future Permittee staff or other users could add or revise project boundaries themselves as needed.

- Population of the GI Tracking Tool field that identifies whether a GI project is regulated under MRP Provision C.3, including following-up with municipal representatives to confirm that the list of non-C.3-regulated parcel-based projects is complete for each Permittee;
- Assistance to each Permittee with the review and update process, including review of each record in the GI Tracking Tool, comparison to the EOA spreadsheet database, and working with Permittees as needed to make revisions;<sup>6</sup> and
- Encouragement to Permittee staff to become familiar with the GI Tracking Tool and Data Upload Template, with a focus on maintaining complete and accurate data for their jurisdictions and the overall goal of setting the stage for reducing the level of assistance needed from SMCWPPP in future years.

**Budget: \$18,876**

## TASK SM316 – ANNUAL REPORTING

EOA will continue to assist the Countywide Program with annual compliance reporting. This includes preparation of the Countywide Program annual report and, for individual municipal annual reports, developing guidance and templates, conducting preparation workshops as needed (these annual workshops are typically held only during the first few years of the permit term), reviewing agency draft reports, and compiling and submitting reports to the Regional Water Board in compliance with the MRP.

San Mateo County Permittees are required to annually report on progress towards trash load reduction goals. EOA's technical support to San Mateo County Permittees on this aspect of annual reporting is scoped and budgeted for separately under the Trash Load Reduction task (see Subtask SMC314.05, Assist with Annual Reporting and Load Reduction Calculations). EOA's review of the trash control sections of San Mateo County Permittee annual reports is also covered under Subtask SMC314.05.

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

### **SUBTASK SMC316.01: COUNTYWIDE PROGRAM ANNUAL REPORT**

EOA will prepare the Countywide Program's Annual Report, which documents all activities performed during FY 2020/21 by the Countywide Program on behalf of San Mateo County Permittees. EOA will develop a draft report annually by late August 2021 for C/CAG and San Mateo County Permittee staff review and comment and final report for submittal by the annual September 30, 2021 due date in the MRP. The budget for this task assumes that most of the content for the Annual Report will be prepared under Task SMC312 (Subcommittee Support) or by C/CAG's other consultants (e.g., public outreach content to be prepared by SGA and any remaining content related to Reasonable Assurance Analysis to be prepared by Paradigm Consultants). This subtask will consist of obtaining, compiling, and formatting that information, preparing standard report features such as a table of contents and executive summary, facilitating review of a draft of the Countywide Program's Annual Report by San Mateo County Permittees, and addressing any comments from Permittees and/or C/CAG staff.

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<sup>6</sup> EOA will add any pre-2018 projects missing from the GI Tracking Tool as part of this process.

**Deliverables:**

- Draft of the Countywide Program's FY 2020/21 Annual Report submitted to C/CAG staff by late August 2021 for transmittal to San Mateo County Permittees. Comments addressed and final report submitted to Regional Water Board staff by September 30, 2021.

**Budget: \$17,360**

**Amendment No. 2 Additional Scope:**

EOA will prepare the Countywide Program's Annual Report, which documents all activities performed during FY 2021/22 by the Countywide Program on behalf of San Mateo County Permittees. EOA will develop a draft report annually by September 1, 2022 for C/CAG and San Mateo County Permittee staff review and comment and final report for submittal by the annual September 30, 2021 due date in the MRP. The budget for this task assumes that most of the content for the Countywide Program Annual Report will be prepared under subcommittee support tasks conducted by EOA or other C/CAG consultants (e.g., public outreach content to be prepared by SGA). This subtask will consist of obtaining, compiling, and formatting that information, preparing standard report features such as a table of contents and executive summary, facilitating review of a draft of the Countywide Program's Annual Report by San Mateo County Permittees, and addressing any comments from Permittees and/or C/CAG staff.

**Amendment No. 2 Additional Deliverables:**

- Draft of the Countywide Program's FY 2021/22 Annual Report submitted to C/CAG staff by September 1, 2022 for transmittal to San Mateo County Permittees. Comments addressed and final report submitted to Regional Water Board staff by September 30, 2022.

**Additional Subtask Budget per Amendment No.1: \$17,360**

**SUBTASK SMC316.02: ANNUAL REPORT GUIDANCE**

EOA will develop an Annual Report guidance package for San Mateo County Permittees' use in preparing their FY 2020/21 annual reports. The package will include a version of the regional Annual Report form customized and annotated with guidance for San Mateo County municipalities, a model certification statement and cover letter, and a memorandum that explains all of the facets of the annual reporting process and summarizes essential dates and milestones. This task does not include developing the public outreach parts of the customized Annual Report form since it is assumed SGA will conduct that work.

**Deliverables:**

- FY 2020/21 Annual Report guidance package submitted to C/CAG staff by mid-July 2021 for transmittal to San Mateo County Permittees and posting on the Countywide Program website.

**Budget: \$7,826**

**Amendment No. 2 Additional Scope:**

EOA will develop an Annual Report guidance package for San Mateo County Permittees' use in preparing their FY 2021/22 annual reports. The package will include a version of the regional Annual Report form customized and annotated with guidance for San Mateo County municipalities, a model certification statement and cover letter, and a memorandum that explains all of the facets of the annual reporting process and summarizes essential dates and milestones. This task does not include developing the public outreach parts of the customized Annual Report form since it is assumed SGA will conduct that work.

**Amendment No. 2 Additional Deliverables:**

- FY 2021/22 Annual Report guidance package submitted to C/CAG staff by mid-July 2022 for transmittal to San Mateo County Permittees and posting on the Countywide Program website.

**Additional Subtask Budget per Amendment No.1: \$7,826**

**SUBTASK SMC316.03: REVIEW DRAFT PERMITTEE ANNUAL REPORTS**

EOA will review and comment on draft FY 2020/21 San Mateo County Permittee Annual Reports prior to submittal of final reports to Regional Water Board staff. San Mateo County Permittees will be required to submit a draft of their Annual Report to EOA by a certain date (to be determined) to guarantee review, but EOA will make every effort to review and comment on draft reports that are submitted late. We assume that the planned review period will be approximately the first two weeks of September 2021.

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

**Deliverables:**

- Review and comment on Permittee draft FY 2020/21 Annual Reports during about the first two weeks of September 2021. Review of the public outreach sections not included.

**Budget: \$12,328**

**Amendment No. 2 Additional Scope:**

EOA will review and comment on draft FY 2021/22 San Mateo County Permittee Annual Reports prior to submittal of final reports to Regional Water Board staff. San Mateo County Permittees will be required to submit a draft of their Annual Report to EOA by a certain date (to be determined) to guarantee review, but EOA will make every effort to review and comment on draft reports that are submitted late. We assume that the planned review period will be approximately the first two weeks of September 2022.

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

**Amendment No. 2 Additional Deliverables:**

- Review and comment on Permittee draft FY 2021/22 Annual Reports during about the first two weeks of September 2022. Review of the public outreach sections not included.

**Additional Subtask Budget per Amendment No.1: \$12,328**

**SUBTASK SMC316.04: SUBMIT PERMITTEE ANNUAL REPORTS**

EOA will electronically obtain the available final FY 2020/21 Annual Reports from San Mateo County Permittees and upload to the Regional Water Board's FTP site. If requested by Regional Water Board staff, EOA will also print a hard copy of each Annual Report and deliver to the Regional Water Board's offices in Oakland.

**Deliverables:**

- Available final FY 2020/21 Annual Reports submitted electronically to Regional Water Board staff by September 30, 2021. If requested by Regional Water Board staff, hard copies submitted by October 15, 2021.

**Budget: \$2,808**

**Amendment No. 2 Additional Scope:**

As needed and to the extent feasible with this subtask's budget, EOA will assist San Mateo County Permittees to submit final FY 2021/22 Annual Reports via the SMARTS system.

**Amendment No. 2 Additional Deliverables:**

- As needed and to the extent feasible with this subtask's budget, assistance to San Mateo County Permittees with submittal of their final FY 2021/22 Annual Reports via the SMARTS system.

**Additional Subtask Budget per Amendment No.1: \$2,808**