



Stormwater Committee Presentations

C/CAG Stormwater Committee – September 21, 2023





Item 1 – Call to Order/Roll Call/Hybrid Zoom Procedures



Item 2 – Public Comment



Item 3 (ACTION) – Review and approve April 20, 2023 Stormwater Committee meeting minutes



**Item 4 (INFORMATION) –
Review and recommend
Board approval of the
revised draft
Stormwater Committee
Guidelines to include
alternates.**



Item 5 (INFORMATION) – Stormwater Announcements



Item 6 (INFORMATION) – Receive information on MRP 3.0 Implementation Updates

Program Budget and Future Funding

■ Priority Challenges:

- Increased compliance costs going from MRP 2.0 to MRP 3.0 (especially Water Quality Monitoring)
- EO approval process to potentially increase costs to comply with some requirements even more
 - Water Quality Monitoring (Trash and LID Monitoring Plans, RWL Plan)
 - PCBs Control Programs (OILU Control Measure Plan)
 - Unsheltered Populations (Regional BMP Report)
 - Cost Reporting Framework (Framework and Guidelines)
- Lack of assured ongoing increased revenue streams for permit compliance assistance

Program Budget and Future Funding

- Accomplishments and Lessons Learned during FY 2022/23:
 - Continued to work with SMCWPPP Funding and Financing Ad-hoc WG and technical/legal experts
 - Explored potential mechanisms to increase revenue for permit compliance assistance
 - Obtained grant funding
 - WQIF Trash Monitoring - \$3,366,000
 - ICARP OneWatershed Framework - \$649,648
 - Earmark for \$2,400,000 for San Bruno Regional Project
 - Submitted earmark request for \$1.5M in Sustainable Streets Design funds

Program Budget and Future Funding

- Plans for Implementation during FY 2023/24:
 - Continue to work with Funding and Financing WG and technical/legal experts and role for C/CAG in supporting revenue options
 - Continue exploring potential mechanisms to increase revenue for permit compliance assistance
 - Continue pursuing grant funding
 - NOAA LOI submitted for \$50M in proposed "OneWatershed Climate Resilience Infrastructure"
 - WQIF for additional infrastructure/compliance?
 - State/Federal Advocacy
 - Continue adaptive management of program funds for MRP implementation support

C.3 and Green Infrastructure (GI)

- Priority Challenges:
 - Implementing requirements for lower C.3 thresholds (including frontage improvements) and new regulated project types (e.g., single family homes and road reconstruction)
 - Continuing implementation of GI Plans, including continuing to evaluate CIPs for GI opportunities
 - Meeting GI numeric retrofit targets at the local and/or regional level
 - Continuing to work with Water Board staff on methodology for quantifying “greened acres” produced by regional projects and flexible treatment approaches
 - Continuing to advance regional-scale stormwater management opportunities in San Mateo County

C.3 and Green Infrastructure (GI)

- Accomplishments and Lessons Learned during FY 2022/23:
 - Completed new/updated fact sheets, updated C.3/C.6 checklist and C.3 Regulated Projects Guide, and conducted C.3 workshop
 - Conducted GI outreach via newsletters/blogs, social media, videos, events, rain barrel distributions, and rain garden rebates
 - Completed development of an Interim MOU-Based Regional Collaborative Program and draft Interim Program Report
 - Advanced the planning and design of regional SW capture projects in Belmont, San Bruno, and Redwood City, and facilitated discussions of strategies to cost share ongoing O&M needs at Orange Memorial Park project

Interim MOU-Based Regional Collaborative Program Summary Report

- Program is intended to enable C/CAG member agencies to cost-share the implementation and maintenance of regional stormwater management projects



engineers | scientists | innovators



Interim MOU-Based Regional Collaborative Program Summary Report

Prepared for

San Mateo Countywide Water Pollution Prevention Program

A Program of the City/County Association of Governments of San Mateo County
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Project Number: CWR0769

September 18, 2023

FINAL

Table of Contents

TABLE OF CONTENTS

1 INTRODUCTION3

2 BACKGROUND3

2.1 Regional Collaborative Program Regulatory and Financial Drivers4

3 INTERIM MOU-BASED REGIONAL COLLABORATIVE PROGRAM5

3.1 Overview5

3.2 Interim Program Administrator6

3.3 Units of Exchange7

3.3.1 Definition and Needs for Units of Exchange7

3.3.2 Interim Program Units of Exchange.....8

3.3.3 Regional Collaborative Projects Generating Units of Exchange9

3.4 Eligible Participants9

3.5 Exchange Boundaries10

4 FINANCIAL CONSIDERATIONS10

4.1 Cost Basis for Units of Exchange10

4.2 Financial Transaction and/or Cost-Sharing Options11

5 INTERIM PROGRAM OPERATIONS12

5.1 Reporting and Tracking.....12

5.2 Operational Document12

5.3 Adaptive Management13

6 CASE STUDY14

6.1 Units of Exchange15

6.2 Cost Basis for Units of Exchange15

6.3 Financial Transactions or Cost Sharing15

7 LEGAL REVIEW PROCESS16

8 NEXT STEPS17

9 REFERENCES18

LIST OF APPENDICES

Appendix A: Supporting Memoranda

Case Study – Orange Memorial Park

- Final approval of Greened Acre units of exchange still needed from Water Board (verbal approval received).
- Project O&M is an ongoing cost that could be used for unit cost basis.
- Long-term buyers have not been identified for Case Study exchanges.
- From 2023-2025, OneShoreline will use Colma Creek Flood Zone property tax funds to cover the direct costs to maintain the project.
- After 2025, other Interim Program buyers or cost apportionments would be needed to pay for project maintenance.

Next Steps

Complete Interim Program Case Study



Further Review and Development of Interim Program (As Applicable)



Market-based Program Transition



Market-Based Program Development

C.3 and Green Infrastructure (GI)

- Plans for Implementation during FY 2023/24:
 - Continue to provide guidance to San Mateo County agencies with C.3 and GI implementation and conduct GI outreach (C.3 RPG)
 - Continue to update/improve the web-based GI Tracking Tool and add functionality as needed to assist with asset management
 - Continue advancing the Regional Project Planning and Collaborative Framework and the initial phase of proposed MOU-based program
 - Kick-off OneWatershed Framework grant project
 - Continue supporting San Bruno, Belmont, and Redwood City on advancing designs and environmental review for regional projects
 - Seek new partnership and funding opportunities to advance the next five regional project concepts from preliminary design towards implementation

C.8 Water Quality Monitoring

- Priority Challenges:
 - Costly new requirements that include types of monitoring never previously implemented in the Bay Area.
 - Monitoring Plans must be informed by Technical Advisory Groups (TAGs) and approved by the EO
 - Trash Monitoring
 - LID Effectiveness Monitoring
 - Receiving Water Limitations Monitoring (EO approval only)
 - MAJOR comments received on plans - RWB staff potentially using EO approval process to expand monitoring requirements
 - Most monitoring must be conducted during storm events
 - Many new technical challenges and potential staffing limitations

C.8 Water Quality Monitoring

- Accomplishments and Lessons Learned during FY 2022/23:
 - Development of multiple monitoring plans with regional collaboration
 - Trash Outfall Monitoring
 - LID Effectiveness Monitoring
 - Receiving Water Limitations Monitoring
 - Sites for Trash Outfall and LID Effectiveness Monitoring
 - Identified (more challenging than anticipated)
 - Permitted (City/Caltrans encroachment permits, CDFW agreement)
 - Equipment installation underway
 - C/CAG obtained WQIF grant funding for Trash Receiving Water Monitoring

C.8 Water Quality Monitoring

- Plans for Implementation during FY 2023/24:
 - Respond to RWB staff comments on Trash Outfall and LID Monitoring Plans
 - Present C.8 concerns at Oct 11, 2023 Water Board meeting
 - EO approval process is potentially expanding requirements
 - Possibly infeasible to implement requirements (storm challenges & staffing)
 - Expanding costs
 - Implement monitoring requirements
 - Trash outfall monitoring (3 storms at 2 outfalls)
 - LID effectiveness (3 storms at 2 facilities)
 - POC monitoring (storm event and dry weather)
 - Pesticide & Toxicity monitoring (dry season)

C.10 Trash Load Reduction

■ Priority Challenges:

- Trash Load Reduction Benchmarks
 - 90% by June 2023 (7 SMCWPPP Agencies did not meet the benchmark)
 - 100% by June 2025
- Siting and Installation of New Full Trash Capture Devices
 - Identifying remaining locations where devices are needed
 - Procuring vendor/construction firms
 - Project delivery within tight timelines
- Ongoing Operation and Maintenance of Full Trash Capture Devices
- Trash Inspections on Private Properties
 - New program needed to ensure trash management on private land areas draining to municipal storm drainage systems

C.10 Trash Load Reduction

- Accomplishments and Lessons Learned during FY 2022/23:
 - Supported achievement of the 90% Trash Load Reduction Benchmark by a majority of San Mateo County municipal agencies
 - Provided tools/templates/support on San Mateo County agency's updated Long-term Trash Reduction Plans (those unable to achieve the 90% benchmark)
 - Assisted with siting and installation of additional Full Trash Capture Devices
 - Supported collaborations between San Mateo County Agencies and Caltrans on Large Full Trash Capture Device planning
 - Developed templates/tools for new Trash Inspection Program focused on Private Land Drainage Areas (PLDAs)
 - Successfully implemented ongoing On-land Visual Trash Assessment (OVTA) program

C.10 Trash Load Reduction

- Plans for Implementation during FY 2023/24:
 - Assist San Mateo County agencies with responses to RWB staff comments on updated Long-term Trash Reduction Plans
 - Assist with implementation and tracking of new Trash Inspection Program for PLDAs
 - Inspection training
 - Additional tools/templates/guidance
 - Provide support on Full Trash Capture Device siting and collaborations with Caltrans
 - Implement ongoing On-land Visual Trash Assessment (OVTA) program
 - Provide ongoing trash data management and reporting assistance
 - Provide additional guidance & support towards achievement of trash load reduction benchmarks

C.12 PCBs Controls

- Priority Challenges:
 - New provision with focus on old industrial land uses requires for SM County Permittees by end of permit term:
 - 445 acres treated or
 - 81 grams per year PCBs load reduction
 - Due to new MRP 3 requirements, San Mateo County Permittees need to play greater role in taking actions to address PCBs than previous permit terms

C.12 PCBs Controls

- Accomplishments and Lessons Learned during FY 2022/23:
 - Worked with SMCWPPP PCBs workgroup to develop new “Control Measures Plan” for reducing PCBs in old industrial land uses over permit term
 - Very challenging to site regional SW capture projects in old industrial land uses based on screening processes that have been conducted to-date
 - Redevelopment is projected to continue reducing PCBs loads to the Bay
 - Continue to opportunistically site and credit full trash capture devices
 - Identifying and cleaning up source properties is challenging but seems to be most cost-effective control measure available to Permittees
 - Participated in regional project to develop guidance for enhancing program to control PCBs during building demolition
 - Implemented other PCBs control programs as required by MRP

C.12 PCBs Controls

- Plans for Implementation during FY 2023/24:
 - Continue working with SMCWPPP Old Industrial PCBs Workgroup/address Control Measures Plan comments
 - Continue assisting Permittees with source property investigation and cleanup programs, including associated sampling and analysis
 - Highly elevated PCBs concentrations (existing program) - as appropriate refer properties to state for additional investigation and cleanup
 - Moderately elevated PCBs concentrations (new program) - Permittees take lead working with property owners to reduce PCBs discharges
 - Continue assisting Permittees to implement program to control PCBs during building demolition, including new required enhancements
 - Implement other PCBs control programs as required by MRP

C.15 Emergency Firefighting Discharges

- Priority Challenges:
 - Significant number of new requirements
 - Engaging fire fighting departments/agencies
 - Engagement of agencies/organizations not previously involved in stormwater
 - Regional BMP Report due September 2025
 - RWB staff following up with individual Permittees when fire fighting discharges occur (reported in Cal OES)

C.15 Emergency Firefighting Discharges

- Accomplishments and Lessons Learned during FY 2022/23:
 - Held two Regional Work Group meetings
 - Developed BAMSC Project Profile
 - Regional Work Group focus will be information sharing - RWB and EPA staff part of Regional Work Group
 - Smaller working group (Task Force) will develop work products
 - Outreach and engagement of fire fighter representatives is crucial
 - May not be priority for fire fighter staff to participate or understand why/how water quality regulations are applicable
 - Participation in development of new/updated BMPs will lead to better acceptance and implementation

C.15 Emergency Firefighting Discharges

- Plans for Implementation during FY 2023/24:
 - Hold two Regional Work Group meetings to share information
 - Begin working with smaller task force to develop Regional Report content and BMPs
 - Provide updates through SMCWPPP CII Subcommittee

C.17 Unsheltered Homeless Populations

- Priority Challenges:
 - New Provision and complex issue/topic
 - Engaging other departments/agencies not previously involved in stormwater
 - Obtaining Point In Time Count data from County Human Services Agency
 - Obtaining information on activities/practices
 - Permittees reporting BMP effectiveness evaluation - may not have been tracking by MRP criteria
 - Portion of unsheltered population/locations served
 - Portion of unsheltered population/locations not reached
 - Regional Report must be acceptable to the EO

C.17 Unsheltered Homeless Populations

- Accomplishments and Lessons Learned during FY 2022/23:
 - RWB staff interested in being engaged in information sharing
 - Engaged County HSA for almost a year to receive 2022 PIT Count data by location
 - Created C.17 maps for Permittees
 - Completed Regional Report (September 2023)
 - Developed as reference
 - BMP Fact Sheets
 - Examples from municipalities

C.17 Unsheltered Homeless Populations

- Plans for Implementation during FY 2023/24:
 - Respond to RWB comments on Regional Report
 - Comments anticipated given responses to other reports submitted
 - Provide guidance to Permittees for 2025 Annual Report early to allow time to track BMP effectiveness by MRP criteria
 - Begin communication with County HSA for 2024 PIT Count data
 - PIT Count typically conducted early in calendar year
 - Maps due in 2025 Annual Report
 - Create opportunities for info sharing (Countywide, BAMSC, etc.)

C.20 Cost Reporting

- Priority Challenges:
 - Permittees required to annually submit a fiscal analysis of the costs to implement the MRP
 - First submittal is due with the September 2025 Annual Report
 - The costs must be reported by permit provision and in defined categories such as personnel, contractors, capital costs and O&M
 - The State Water Board has released a draft cost reporting policy that would apply to all MS4 Permittees in the State and contains different reporting categories
 - Comments on the draft policy are due on October 3rd

C.20 Cost Reporting

- Accomplishments and Lessons Learned during FY 2022/23:
 - Collaborated with other countywide programs through BAMSC to complete a Bay Area Cost Reporting Framework (Excel-based tool) and Guidance Manual.
 - Participated in the BAMSC Regional Cost Reporting Work Group that oversaw the work and provided feedback on the draft products
 - Conducted two presentations to the Stormwater Committee
 - Received conditional approval and minor comments from Water Board staff on August 11, 2023

C.20 Cost Reporting

- Plans for Implementation during FY 2023/24:
 - Finalize the Bay Area Cost Reporting Framework by addressing Water Board staff comments and support other updates as needed
 - Comment on State Water Board draft and revised draft policies and continue to work with SWB staff to get the reporting frameworks to align as closely as possible
 - Support San Mateo County Permittees in beginning to develop their first annual fiscal analyses due September 2025 by answering Permittee questions and conducting brief presentations of the methodology in appropriate forums.

C.21 Asset Management

■ Priority Challenges:

- Permittees required to develop and implement Asset Management (AM) Plans for publicly-owned, water quality-related hard assets (e.g., LID/GI and trash capture systems) by June 30, 2025 and begin implementing in FY 2025/26
- AM Plans must include O&M Plans for prioritizing and scheduling O&M/replacement based on condition assessments
- Permittees must also report annually on AM Plan implementation, starting with the FY 2025/26 Annual Report:
 - Inventory of assets (different categories of assets may be maintained in separate inventories)
 - Design information, condition, and O&M/replacement needs of assets

C.21 Asset Management

- Plans for Implementation during FY 2023/24:
 - Form a San Mateo Countywide AM Work Group to discuss member agency needs and best approach(es) for assistance from the Countywide Program and use of the GI Tracking Tool
 - Participate in a Regional AM Work Group to gain consensus on approaches to AM Plans and condition assessments
 - Develop an AM Plan template and an AM O&M Plan template for Permittees to use to develop local AM Plans during FY 2024/25

MRP 3.0 Amendment

- During MRP 3.0 adoption hearing in May 2022 several amendments were proposed with direction from Water Board members
 - C.3 Amendments (Alternative Treatment Systems and Special Projects Category C + Road Reconstruction impacts on DACs) + consideration of WQ costs and implementation
- SMCWPPP submitted Comment Letters on Admin Draft and Tentative Order MRP 3.0 Amendment
- Hearing Scheduled for October 11, 2023
 - Presentation on C.3 Amendments
 - Presentation on WQ provisions regarding implementation and cost challenges



Item 7 – Regional Water Board Report



Item 8 – Executive Director’s Report



Item 9 – Member Reports



Item 10 – Adjourn