



Stormwater Committee Presentations

C/CAG Stormwater Committee Meeting – March 21, 2024





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



Item 2 – Public Comment



Item 3 (ACTION) – Review and approve January 18, 2024 Stormwater Committee Special Meeting minutes



**Item 4 (INFORMATION) –
Receive information on
stormwater related
announcements.**

Revised Old Industrial Control Measures Plan for PCBs/Mercury (OICMP)

MRP 3.0 Requires San Mateo County permittees:

- Address 445 acres treated/81g PCBs reduced in old industrial areas that have moderate to high concentrations of PCBs
- Concentrated in about half of the municipalities (Old Industrial Work Group), though compliance is assumed at countywide scale
- Submitted initial OICMP in March 2023
- WB requested significant changes
- SMCWPPP OI WG meeting since Oct to address changes

Revised Old Industrial Control Measures Plan for PCBs/Mercury (OICMP)

Revised OICMP approach:

1. Targeted Control Measures

- Enhanced monitoring in priority catchments + onsite monitoring on potential moderately contaminated properties
- Ongoing source property referral and abatement
- Targeted actions in drainages associated with mod-high PCBs (enhanced O&M, green infrastructure, POTW diversions)

2. Non-targeted Control Measures

- Opportunistic implementation of sw controls (GI, trash capture, high-flow media systems) – in OI areas that may not be verified yet through monitoring
- Additional documentation for credit claimed on opportunistic controls

Revised Old Industrial Control Measures Plan for PCBs/Mercury (OICMP)

Revised OICMP approach:

3. Implementation schedule for enhanced monitoring and control measures implementation (see Appendix A high priority catchment factsheets)
4. Estimates of load reduction calculations (maximum and best estimate – proportions of LID projects completed, GI retrofit, etc.)
5. Appendices:
 - Appendix A – High Priority PCBs Catchment factsheets (maps of areas for enhanced monitoring and program implementation and schedule of actions)
 - Appendix B – Outreach materials (PCBs/Hg Factsheet and Sediment BMPs Factsheet + Inspection Letter Template and Draft PCBs Sediment Control Plan Template)

Table 6.1. Anticipated schedule for control measure planning and implementation tasks in old industrial areas with moderately to highly elevated PCBs areas during MRP 3.0.

Control Measure - Planning and Implementation Tasks			MRP 3.0 Year				
			FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
Targeted Control Programs	Verification Monitoring and Source Area Investigations	Develop MRP 3.0 PCBs source area investigation and monitoring plan					
		Conduct Verification Monitoring in medium priority catchments to confirm moderately/highly elevated PCBs to identify catchments/parcels with elevated PCBs for further investigation					
		Conduct public ROW sampling in screened areas that have elevated PCBs					
		Develop new on-site inspection and sampling procedures					
		Conduct on-site inspection and sampling investigations					
		Review investigation results and identify new (moderately and highly elevated) PCBs source properties					
	Controls for Moderately Elevated PCBs Source Properties	Develop the new program to control MPCPs					
		Implement the new program to control MPCPs					
	Program to Abate Highly Elevated PCBs Source Properties	For existing source property (1.3 acres identified previously), follow-up with owner on implementation of property abatement.					
		For new high PCBs source properties identified during MRP 3.0, evaluate options and develop plans for abatement and enhanced O&M.					
		Submit referrals for new highly elevated PCBs source properties to Water Board and begin enhanced O&M in public ROWs					
	Document PCBs loads reduced during permit term for all referred and/or abated moderately to highly elevated PCBs source properties						
Other Control Measure Programs	Green Infrastructure	Continued municipal oversight and review to ensure all C.3 Regulated Project requirements are met. Continued inspections and tracking of all C.3 Regulated Projects.					
		Continued planning and implementation of municipal agency GI Plans.					
		Complete construction of Orange Memorial Park regional stormwater capture facility					
		Ongoing planning to identify public C.3.j. project sites, develop funding sources, design, and construct projects					
	Document PCBs and mercury loads reduced during permit term for all constructed GI/LID projects						
	Other Stormwater Treatment Systems	Plan, design, and construct planned high-flow capacity stormwater treatment systems and inlet-based stormwater screening devices in the County					
		Conduct additional GIS analysis to identify candidate catchments for high-flow capacity stormwater treatment systems and inlet-based stormwater screening devices to achieve multiple benefits					
		Ground-truth candidate catchment locations and identify final selection for funding					
		Conduct planning to implement additional high-flow capacity stormwater treatment systems and inlet-based stormwater screening devices					
	Document PCBs and mercury loads reduced during permit term for all constructed/installed stormwater treatment systems/devices						

Revised Old Industrial Control Measures Plan for PCBs/Mercury (OICMP)

Finalization Next Steps:

- Comments from the OI Workgroup were due March 20
- OICMP will be finalized and C/CAG staff will request DAR approval with other DAR approvals this week
- C/CAG staff will submit to the Regional Water Board by April 2
- Agencies with Priority Catchments/Factsheets will begin implementing enhanced monitoring and inspection program this FY with support from SMCWPPP
- To support ongoing enhanced monitoring, working with BAMSC on EPA R9 SF Bay Program Office Grants



Item 5 (INFORMATION) – Receive information on potential changes to Countywide Stormwater Program certification and submittal process for the MRP

Background on MRP Countywide/Regional Submittals

Standard Provisions – Reporting (Attachment G of the MRP)

“All reports required by this Order and other information requested by the Water Board, State Water Board, or U.S. EPA shall be signed by a person described in Standard Provisions – Reporting Part V.B.2 above, or by a duly authorized representative of that person.”

- DARs must be authorized in writing by a person described in Standard Provisions
- DARs may be a named person or position with responsibility over the MS4/environmental compliance
- Written authorization must be submitted to the State and Regional Water Boards

Background on MRP Countywide/Regional Submittals

Current certification/submittal processes for SMCWPPP and Permittees

- Prior to FY21-22 City Managers specified DARs in letters to C/CAG and the Regional Water Board (including local agency staff names/positions and C/CAG's Stormwater Program Coordinator/Executive Director)
 - Municipal staff DARs submitted Annual Reports, etc.
 - C/CAG staff certified and submitted Program or regionally developed reports and requested DAR approval via email to do so on behalf of co-permittees
- Beginning FY21-22 transitioned to SMARTS NPDES Annual Report submittals
 - Municipal staff establish Legally Responsible Persons/DARs for Annual Report submittals via SMARTS
 - C/CAG staff or BAMSC co-chair submitting Program/regional reports on behalf of co-permittees with DAR approval via email

Options for MRP Countywide/Regional Submittals for consideration

1. Delegate approval authority to Subcommittees
 - Subcommittees review/comment on countywide and regional documents and as finalized, C/CAG program staff are authorized to certify and submit on behalf of permittees (perhaps only for standard submittals, i.e., Annual Report forms)
 - Reduced oversight, but more streamlined and efficient
2. Delegate approval authority to Stormwater Committee
 - Stormwater Committee approves compliance submittals on behalf of permittees at regularly scheduled meetings
3. Maintain existing process (email DARs for approval to certify/submit)
 - More burden on DARs given increased number of submittals for MRP 3.0
 - If it's not broken...

Next steps

1. With Committee input, C/CAG staff will proceed with maintaining existing process or take steps to develop new process for countywide/regional submittals (note – DAR submittals for Apr 2, 2024 will remain under existing process)
2. If options 1 or 2 are desired, C/CAG staff proposes drafting a joint letter indicating the options for approving and certifying/submitting compliance documents
 - Specify the process of maintaining LRPs/DARs for jurisdictional submittals as updated through the SMARTS platform (individual DARs or positions need not be listed in the letter)
 - Specify the process(es) for approving and certifying/submitting countywide/regional reports and documents via Countywide Program
 - To be signed by all Executive Management staff of permittee agencies (DocuSign)
3. If options 1 or 2 are pursued, plan to bring back draft letter for approval by the Committee in coming months



**Item 6 (INFORMATION) –
Receive information on
potential Caltrans and
San Jose Conservation
Corps and Charter School
partnership for litter
abatement efforts.**

SJCC+CS and Caltrans Partnership for litter abatement

- SJCC+CS presented in November on partnership opportunities to address litter reduction and other road maintenance needs through workforce program
- Interested in expanding work in San Mateo County
- C/CAG staff exploring opportunities to fund litter abatement through a contracting arrangement between C/CAG and Caltrans to fund work conducted by the SJCC+CS
 - Modeled from existing program in Santa Clara County funded by Clean California Initiative
 - Staff discussions with Caltrans, SJCC+CS and C/CAG's legal counsel (identified some process needs but overall feasible)
 - Contracting arrangement/encroachment from Caltrans/Cities/scope and prioritization

SJCC+CS and Caltrans Partnership for litter abatement

Relationship to MRP trash reduction goals

- 100% load reduction compliance by July 1, 2025
- MRP 3.0 withdrew all source control accounting as well as creek and shoreline credits and offsets towards 100% goal
- Few opportunities left for large full trash capture projects (including four recent projects with secured/potential funding in partnership with Caltrans – San Mateo, Pacifica, Colma/Daly City, East Palo Alto)
- Potential to shift remaining uncontrolled moderate/high/very high loading areas towards low via litter abatement and OVTAs

SJCC+CS and Caltrans Partnership for litter abatement

SMCWPPP Member Agency	Caltrans Area (Acres) Identified	% of Area Identified
Atherton	1.7	0.7%
Belmont	7.1	2.7%
Brisbane	2.9	1.1%
Burlingame	9.3	3.5%
Colma	3.5	1.3%
Daly City	30.9	11.8%
East Palo Alto	8.9	3.4%
Foster City	0.5	0.2%
Half Moon Bay	5.5	2.1%
Hillsborough	--	0.0%
Menlo Park	3.4	1.3%
Millbrae	5.3	2.0%
Pacifica	22.8	8.7%
Portola Valley	--	0.0%
Redwood City	44.4	16.9%
San Bruno	12.2	4.6%
San Carlos	5.0	1.9%
San Mateo	63.6	24.2%
San Mateo County	10.4	3.9%
South San Francisco	25.6	9.7%
Woodside	--	0.0%
Total	262.9	--

Next steps

1. With direction for the Stormwater Committee, C/CAG staff will continue working with SJCC+CS and Caltrans to develop a proposed contracting structure
2. Work with Stormwater Committee (Ad-hoc Implementation Work Group) to develop a process for identifying and prioritizing scope areas, timing, etc.
3. Bring draft scope of work and process to Stormwater Committee for consideration of a recommendation to the C/CAG Board to execute contracts



Item 7 – Regional Water Board Report



Item 8 – Executive Director’s Report



Item 9 – Member Reports



Item 10 – Adjourn