

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

Atherton • Belmont • Brisbane • Burlingame • Colma • Daly City • East Palo Alto • Foster City • Half Moon Bay • Hillsborough • Menlo Park
Millbrae • Pacifica • Portola Valley • Redwood City • San Bruno • San Carlos • San Mateo • San Mateo County • South San Francisco • Woodside

TASK ORDER FORM

Date/Start Date: July 1, 2024

Consultant Name: EOA, Inc.

Contract: Countywide Water Pollution Prevention Program Technical Support – On-Call Contracts

Task Order No.: EOA-17

Task Order Name: Municipal Stormwater NPDES Permit Compliance Assistance

Scope of Work: General Technical Support, Subcommittee Support, Annual Reporting, Green Infrastructure and Regional Collaborative Program Planning, Public Information and Outreach, Water Quality Monitoring, Trash Load Reduction, PCBs and Mercury Load Reduction, Exempted and Conditionally Exempted Discharges, Unsheltered Populations, Cost Reporting and Asset Management. See attached scope of work.

Deliverables: See attached scope of work

Budgeted Cost: Per attached Fiscal Year 2024-25 scope of work, not to exceed \$2,460,000. Any consultant services performed under this Task Order between July 1, 2024 and September 30, 2025, and associated expenditure of funds for such services, which shall in no case exceed the \$2,460,000 amount for Fiscal Year 2024-25, must be (1) approved by C/CAG staff in writing prior to engaging in such services, and (2) will be contingent upon the continued allocation of any remaining Fiscal Year 2024-25 funds during the annual C/CAG budget approval process for Fiscal Year 2025-26.

Completion Date: September 30, 2025

The parties indicated herein agree to execute this Task Order per the scope indicated above. No payment will be made for any work performed prior to the execution of this Task Order. Unless otherwise indicated, receipt of this executed Task Order is your Notice to Proceed with the work specified herein.

C/CAG

EOA, Inc.

Sean Charpentier
Executive Director

Date

Date

Municipal Stormwater NPDES Permit Compliance Assistance

FY 2024/25 Scope of Work and Budget

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



May 31, 2024



Prepared by EOA, Inc. in association with Geosyntec Consultants, Paradigm Environmental, SGA Marketing, Kinnetic Environmental, and SCI Consulting Group



INTRODUCTION

EOA, Inc. (EOA) prepared this scope of work (scope) and budget to provide permit compliance services to the San Mateo Countywide Water Pollution Prevention Program (Countywide Program or SMCWPPP). For these services, EOA has assembled a highly experienced and qualified project team (EOA Team) comprised of EOA, Geosyntec Consultants (Geosyntec), Paradigm Environmental (Paradigm), S. Groner Associates (SGA), Kinnetic Environmental, Inc. (KEI), and SCI Consulting Group (SCI).

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 which is comprised of Order Nos. R2-2022-0018 (adopted in May 2022) and R2-2023-0019 (amendments adopted in October 2023), and commonly referred to as the Municipal Regional Permit (MRP 3.0). The following sections describe EOA's tasks, budgets, and deliverables for FY 2024/25 (i.e., July 2024 – June 2025).

The below table summarizes the tasks included in the scope and associated budgets. The subsequent sections describe subtasks, estimated labor hours and hourly rates for EOA staff, and estimated subcontractor and expense budgets. Please note 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 3, 2022. The total budget of \$2,460,000 will not be exceeded without C/CAG's authorization.

Summary of EOA Team FY 2024/25 tasks and budgets.

Task No.	Task Name	EOA Team Budget FY 2024/25
SMC611	General Technical Support	\$161,986
SMC612	Subcommittee Support	\$144,648
SMC613	Training	\$39,968
SMC614	GI and Regional Collaborative Program Planning	\$285,649
SMC615	Public Information and Outreach	\$163,136
SMC616	Annual Reporting	\$68,305
SMC617	Water Quality Monitoring	\$882,975
SMC618	Trash Load Reduction	\$358,816
SMC619	PCBs and Mercury Load Reduction	\$252,806
SMC620	Exempted and Conditionally Exempted Discharges	\$17,579
SMC621	Unsheltered Populations	\$37,437
SMC622	Cost Reporting	\$5,012
SMC623	Asset Management	\$19,988
SMC624	Overall Contingency	\$21,695
	Total	\$2,460,000

TASK SMC611 – GENERAL TECHNICAL SUPPORT

For General Technical Support, the following sections describe EOA’s understanding of the task and approach, the roles and expertise of our project team members, and the scope-of-work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

For 25+ years EOA has assisted C/CAG staff with the planning, budgeting, and management of the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP). During that time, EOA facilitated C/CAG’s efforts to assist San Mateo County Permittees to comply with all aspects of the Municipal Regional Permit (MRP). This has included helping C/CAG staff to facilitate the Stormwater Committee, which is mainly composed of director-level municipal staff, and a number of technical subcommittees and workgroups that focus on various provisions of the MRP. EOA has also assisted with implementation of many compliance activities under MRP that are managed at the regional level via joint funding and/or by participating with other countywide stormwater programs. These efforts are currently coordinated through the Bay Area Municipal Stormwater Collaborative (BAMSC). EOA staff routinely participates in BAMSC Steering Committee meetings and its various subcommittees on behalf of C/CAG, often providing a leadership role. For example, during the most recent reissuance of the MRP, EOA staff played key roles in negotiations with San Francisco Bay Regional Water Quality Control Board (Water Board) staff, coordination among Bay Area Permittees and countywide stormwater programs, and provided testimony directly to the Water Board on behalf of C/CAG and the broader stormwater community in the Bay Area. As a result, EOA is intimately familiar with each provision in the reissued permit (MRP 3.0).

EOA’s Project Manager (Bonnie de Berry) will continue to serve as a central point of contact to C/CAG staff and will also remain available to assist member agency staff, by providing support and answering questions directly or by referring issues to the appropriate EOA specialist in the relevant topic area.

In addition to the ongoing routine committee, subcommittee, and workgroup meetings, this scope includes holding an annual combined Stormwater Committee and NPDES Technical Advisory Committee (TAC) meeting in the late spring. The purpose is to engage mid-level and other municipal staff in discussing lessons learned in the previous fiscal year and to plan for the upcoming fiscal year. In addition to the higher-level Stormwater Committee members, it is important to coordinate with other municipal staff that more directly conduct stormwater related activities and annual reporting.

PROJECT TEAM ROLES AND EXPERTISE

As part of continuing her overall role as EOA’s Project Manager for providing municipal stormwater permit compliance support to C/CAG, Bonnie de Berry, CPSWQ, will serve as the task leader. Jill Bicknell, Chris Sommers, and other EOA staff will also assist with this task as appropriate. EOA does not plan to use subcontractors for this task.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for General Technical Support are described in Table 1.1. Table 1.2 provides the schedule for each subtask. The schedule is based on our current understanding of MRP 3.0 requirements and C/CAG and San Mateo County Permittee needs. EOA will work closely with the C/CAG Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 1.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

Table 1.1 Descriptions, deliverables, and cost estimates for General Technical Support subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC611.01: GENERAL SUPPORT			
FY 2024/25	EOA will provide general support to assist C/CAG staff in managing the Countywide Program, including planning budgets, scheduling committee and subcommittee meetings, strategic planning for regional vs. countywide projects, ensuring that permit compliance dates and deliverables are met, and other types of general technical and regulatory support. This subtask includes on-call assistance to municipal staff members by responding to their emails and telephone calls. It also includes preparing for and participating in check-in calls with the Program Director (generally every other week) and conducting follow-up actions and other communications as needed. It also includes overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff working on various components of the Countywide Program. Finally, this subtask includes preparation of monthly invoices, and as needed, annual update of EOA's tasks and budgets. While this subtask includes working with the Program Director to identify and evaluate opportunities for grant funding, it does not include preparing grant funding applications, since the level of effort would vary widely depending on the specific grant funding opportunity.	<ul style="list-style-type: none"> • General technical and regulatory support to C/CAG staff. • On-call communications with municipal staff. • Preparing for and participating in check-in calls with Program Director (generally every other week) and conducting follow-up actions and other communications as needed. • Overall project management and oversight of EOA's tasks, including facilitating coordination among EOA staff and subcontractors working on various components of the Countywide Program. • 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. • Annual update of EOA's tasks and budgets (spreadsheets and narrative). 	\$93,820
SUBTASK SMC611.02: STORMWATER COMMITTEE SUPPORT			
FY 2024/25	EOA will provide support to the Program Director in facilitating C/CAG's Stormwater Committee, including assistance in preparing agenda and minutes and providing presentations. For the purposes of budgeting, we are assuming that EOA will participate in nine meetings per year, with presentations (or development of presentation materials) provided by an EOA manager at three of those meetings on high priority topics such as trash controls, mercury/PCBs controls, monitoring, and Green Infrastructure. EOA will also assist the Program Director to facilitate an assumed two meetings per year 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, mercury/PCBs controls, and associated compliance issues.	<ul style="list-style-type: none"> • Assistance with agenda and minutes and participation in nine Stormwater Committee meetings per year. • Presentations by EOA managers on high priority topics provided at three Stormwater Committee meetings per year. • At nine meetings of the Stormwater Committee per year, EOA staff will take notes, and develop a draft meeting summary focusing on important outcomes and action items. • Assistance with agenda and participation in two meetings per year of the Stormwater Committee ad hoc permit implementation workgroup. 	\$26,756

Table 1.1 Descriptions, deliverables, and cost estimates for General Technical Support subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC611.03: NPDES TECHNICAL ADVISORY COMMITTEE SUPPORT			
FY 2024/25	Provide support to the Program Director for NPDES Technical Advisory Committee (TAC), including preparing a quarterly digest that summarizes the schedule for upcoming meetings and trainings and compiles summaries of the previous month's subcommittee and workgroup meetings. We are assuming that communications with the NPDES TAC will continue to be conducted primarily via email. However, this scope includes an annual combined Stormwater Committee and NPDES TAC meeting in the late spring to engage mid-level and other municipal staff in discussing lessons learned in the previous fiscal year and to plan for the upcoming fiscal year. In addition to the higher-level Stormwater Committee members, it is important to work with other municipal staff that more directly conduct stormwater related activities and annual reporting. EOA will assist the Program Director to facilitate this meeting, including assistance in preparing the agenda and minutes and providing presentations as needed.	<ul style="list-style-type: none"> • Four quarterly digests. • Facilitation of one combined Stormwater Committee and NPDES TAC meeting per year. This effort is mainly budgeted above under Subtask SMC611.02 (Stormwater Committee Support). 	\$5,788
SUBTASK SMC611.04: BAMSC STEERING COMMITTEE ACTIVITIES SUPPORT			
FY 2024/25	EOA will support the Program Director with participating in monthly meetings of the BAMSC Steering Committee, including reviewing agenda packages and providing comments as needed. EOA will also support the Program Director with general coordination between BAMSC and Countywide Program activities.	<ul style="list-style-type: none"> • Review and comment on agenda packages and participation in monthly BAMSC Steering Committee meetings. 	\$8,682
SUBTASK SMC611.05: REGIONAL COLLABORATION SUPPORT			
FY 2024/25	Occasionally the need has arisen for implementation of projects that are more cost-effectively conducted via a collaboration among MRP Permittees from the various Bay Area counties. SMCWPPP and/or San Mateo County Permittees may wish to participate in future regional projects by providing in-kind services through consultant staff. EOA will provide support to the Program Director in planning for and supporting implementation of any regional collaborative projects, including preparation of budget projections, coordinating C/CAG's role, tracking C/CAG's budget share of all regional projects to which C/CAG is a participant, and participating in review and comment of BAMSC-developed or other related documents, including annual reporting materials. The budget for this subtask includes about \$20,000 for EOA staff to provide in-kind participation towards C/CAG's share of regional collaborative efforts such as participation in the "Annual Stormwater Meeting" scheduled for November 2024 and coordinated development of FY 25/26 Annual Report forms (this budget would only be expended with authorization by Program Director).	<ul style="list-style-type: none"> • Preparation of budget projections for any regional collaborative projects. • Coordinating C/CAG's role and tracking C/CAG's budget share of all regional collaborative projects to which C/CAG is a participant. • Participating in review and comment of BAMSC-developed or other documents related to regional collaborative efforts, including Annual Reporting materials. • In-kind participation in regional collaborative project(s), as needed and authorized by the Program Director. • Participation in "Annual Stormwater Meeting," as authorized by the Program Director 	\$26,940

Table 1.2. Schedule for completing General Technical Support subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25											
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
SMC611.01	General Support												
SMC611.02	Stormwater Committee Support												
SMC611.03	NPDES TAC Support	•			•			•			•		
SMC611.04	BAMSC Steering Committee Activities Support	•	•	•	•	•	•	•	•	•	•	•	•
SMC611.05	Regional Collaboration Support												

Table 1.3. Estimated costs for completion of General Technical Support subtasks and deliverables.

Subtask	Hourly Rate:	EOA Staff Position													EOA Expenses	Budget		
		Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant			Technician	Clerical
FY 2024/25																		
SMC611.01	General Support	16	--	368	--	--	--	--	--	--	--	--	--	--	24	--	\$100	\$93,820
SMC611.02	Stormwater Committee Support	8	--	64	--	--	--	--	--	--	54	--	--	--	--	--	\$500	\$26,756
SMC611.03	NPDES TAC Support	--	--	24	--	--	--	--	--	--	--	--	--	--	--	--	\$100	\$5,788
SMC611.04	BAMSC Steering Committee Activities Support	--	--	36	--	--	--	--	--	--	--	--	--	--	--	--	\$150	\$8,682
SMC611.05	Regional Collaboration Support	8	--	32	--	40	--	20	--	20	--	--	--	--	--	--	\$500	\$26,940
		32	0	524	0	40	0	20	0	74	0	0	0	0	24	0	\$1,350	\$161,986

TASK SMC612 – SUBCOMMITTEE SUPPORT

For Subcommittee Support, the following sections describe EOA’s understanding of the task and approach, our project team member roles and expertise, and the scope-of-work (including subtask deliverables and budgets).

UNDERSTANDING AND APPROACH

EOA has extensive experience supporting Bay Area countywide municipal stormwater program committees that focus on specific MRP compliance areas. The overall goal is to provide regular forums for engagement with member agency staff on key permit implementation issues. Since the early 1990s, EOA has assisted with staffing and facilitating most of the Countywide Program’s various technical subcommittees and workgroups that address “core” permit requirements including municipal operations, new and redevelopment, industrial and commercial site controls, illicit discharge detection and elimination, construction site control, pesticide toxicity control, copper control, and conditionally exempted discharges. Typical services include 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.

The Countywide Program’s subcommittees are generally chaired by staff from one of the member agencies who volunteered for the position. EOA understands the importance of and has extensive experience in working 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. C/CAG member agencies require a higher level of support and guidance during the early part of the reissued permit term to understand and comply with new or revised requirements in the recently reissued permit. Early in the permit term, subcommittee meetings focus on providing guidance to municipal staff regarding important changes in the reissued permit and implications for member agency compliance activities. Participation in BAMSC meetings related to Provisions C.8/11/12 Monitoring/Mercury/PCBs, C.15.b.iii. Firefighting Discharges, C.17 Unsheltered Homeless Populations, C.20 Cost Reporting, and C.21 Asset Management are included in Tasks SMC617, SMC620, SMC621, SMC622, and SMC623, respectively. Trainings are included in Task SMC613.

PROJECT TEAM ROLES AND EXPERTISE

Subcommittee coordination will be provided by EOA staff members with specific expertise in the topic areas associated with each subcommittee, with overall coordination from Bonnie de Berry, EOA’s project manager for C/CAG work. The EOA lead for each subcommittee is described below with each corresponding subtask description. SGA, a subcontractor to EOA, will facilitate the Public Information and Participation Subcommittee.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for Subcommittee Support are described in Table 2.1. Table 2.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 2.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

SUBTASK SMC612.01: MUNICIPAL MAINTENANCE SUBCOMMITTEE

In FY 2024/25, EOA will facilitate and provide staff support to one annual meeting of the Countywide Program’s Municipal Maintenance Subcommittee, with a focus on compliance with MRP Provisions C.2 (Municipal Operations), and additional support for implementation of C.15.b.iii. (firefighting discharges containment and cleanup) and C.10 (Trash Controls), as needed. Municipal Maintenance Subcommittee meetings are typically one hour held over lunchtime on the fourth Wednesday of the month. A large portion of the meeting time will be dedicated to information sharing, the most important aspect for this subcommittee. Municipal maintenance staff from the various municipal agencies in San Mateo County will have the opportunity to ask questions, share problems and solutions, discuss issues, and share important information and feedback at the annual meeting.

The most significant change to Provision C.2 under MRP 3.0 was the addition of training requirements. Training for municipal staff is described later in Subtask SMC613.01. A priority for the Municipal Maintenance Subcommittee will be helping with responses to Regional Water Board staff questions on corporation yard Stormwater Pollution Prevention Plans (SWPPPs) submitted with the FY 23/24 Annual Reports and updating SMCWPPP templates as needed. This subcommittee will also serve as a forum to discuss containment and cleanup BMPs and SOPs related to emergency firefighting discharges (Provision C.15.b.iii.) and discharges from unsheltered homeless populations (Provision C.17 and C.2.b). The EOA task lead will assist the subcommittee to coordinate with the regional Firefighting Discharges Working Group and other relevant SMCWPPP Work Groups. Further details regarding this subtask's description, deliverables, and budget are provided below in Table 2.1.

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. Kristin has extensive experience with facilitating this subcommittee for the Countywide Program and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara).

SUBTASK SMC612.02: NEW DEVELOPMENT AND CONSTRUCTION SUBCOMMITTEE

In FY 2024/25, EOA will facilitate and provide staff support to two virtual 2-hour meetings of the Countywide Program's New Development and Construction Subcommittee (NDS), with a focus on compliance with MRP Provisions C.3 (New Development and Green Infrastructure), C.6 (Construction), C.13.a. (Architectural Copper) and C.21 (Asset Management). Attendees are generally C/CAG member agency staff from planning, building, engineering, and public works departments in the various municipal agencies in San Mateo County. Guidance documents such as the C.3 Regulated Projects Guide (C3RPG), project checklists and other information related to development projects and updates on countywide and regional activities are the typical items on the agenda. The NDS is also a forum for GI-related topics. This can include discussing and providing input to Task SMC614 (GI and Regional Collaborative Program Planning), such as reviewing possible future updates to the GI Design Guide (GIDG). NDS meetings provide opportunities for member agency staff to ask questions, share information, and discuss problems and solutions related to Provisions C.3 and C.6 implementation. EOA will also provide technical on-call support for permittee staff on development related issues (C.3, C.6 and C.13.a) via email and phone, up to the available budget for this Subcommittee.

Peter Schultze-Allen, CPSWQ, will continue to serve as EOA's lead for facilitation of the NDS and related work under this subtask. Jill Bicknell, P.E., will work closely with Peter on this subtask to bring in her extensive experience in implementation of Provision C.3 requirements and to ensure integration with Task SMC614 (GI and Regional Collaborative Program Planning), for which Jill is EOA's lead. Peter has extensive experience with facilitating the NDS for the Countywide Program and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara and Alameda). As a former City of Emeryville staff, he understands the needs of municipal staff and the internal processes of municipal governments. He attends the BAMSC Development Subcommittee and shares information from those meetings with C/CAG member agencies with NDS members.

SUBTASK SMC612.03: COMMERCIAL/INDUSTRIAL/ILLICIT DISCHARGE SUBCOMMITTEE

In FY 2024/25, EOA will facilitate and provide staff support for two meetings of 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), C.13.b. and c. (Copper Controls) and C.15 (Exempted and Conditionally Exempted Discharges). A portion of the meeting time is dedicated to general information sharing. Municipal staff from the various municipal agencies in San Mateo County can ask questions, share information, and discuss problems and solutions among themselves.

Please note that during FY 2023/24, this subtask did not include development of or updating outreach material, forms, or tracking templates, development of materials and coordinating with the PIP Subcommittee for countywide activities for mobile business outreach, updating website business inspector or illicit discharge contact lists, or on-call support to municipal staff. These activities are also not included in FY 2024/25 budget.

To assist Permittees with compliance of MRP C.5.e Control of Mobile Sources, EOA maintains a countywide mobile business inventory and enforcement response table with information provided by Permittees. EOA will continue to annually update these lists.

With reissuance to MRP 3.0, a significant change in Provisions C.4 and C.5 is the new C.5.f. MS4 Map requirement to develop a plan and schedule for updating Permittee storm sewer system information including missing information and the potential to identify component locations, size or specifications, materials of construction, and condition. EOA will include discussions of this reporting requirement in the CII Subcommittee; however, it may be that guidance and assistance to C/CAG member agencies is developed in conjunction with other committees. Tasks related to this requirement should begin in FY 2024/25 since the plan must be submitted in September 2026.

Provision C.15.iii.(3)(c) has requirements for Permittees to evaluate the adequacy of large industrial sites' (such as IGP sites, gas plants, gas concentration facilities and chemical plants) BMPs and SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters, and cause those BMPs and SOPs to be improved as appropriate. Permittees may require guidance on implementing this requirement that is not specifically addressed in the Regional Firefighting Discharges Report being developed through Task SMC620.

Kristin Kerr, P.E., will continue to serve as EOA's lead for facilitation of the CII Subcommittee and related work under this subtask. Kristin has extensive experience with facilitating this subcommittee for the Countywide Program and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara and Alameda). Further details regarding this subtask's description, deliverables, and budgets are provided below in Table 2.1.

SUBTASK SMC612.04: TRASH SUBCOMMITTEE

EOA will continue to facilitate and provide staff support quarterly meetings of the Countywide Program's Trash Subcommittee, which are intended to provide a forum for sharing information among member agencies related to trash reduction in San Mateo County and discuss compliance activities required by the MRP. As the Subcommittee Coordinator, EOA will develop and distribute meeting agendas, prepare meeting materials as needed, participate in the meetings, and prepare and distribute meeting summaries. 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 3.0 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 such as John Fusco. Chris has extensive experience with facilitating this Subcommittee for the Countywide Program and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara and Alameda). For continuity, Chris will also represent the Countywide Program on the BAMSC Trash Subcommittee.

SUBTASK SMC612.05: WATERSHED ASSESSMENT AND MONITORING SUBCOMMITTEE

EOA will continue to facilitate and provide staff support to the annual meeting of the Countywide Program's Watershed Assessment and Monitoring (WAM) Subcommittee, with a focus on compliance with MRP Provision C.8 (Water Quality Monitoring) and portions of Provisions C.11/12 (Mercury/PCBs Controls). WAM Subcommittee meetings are typically two hours in length during which the complex monitoring requirements of the MRP are described, recent monitoring results are presented (often within the context of historical and/or regional results), and the relationship between Pollutants of Concern Monitoring and Mercury/PCBs load reduction targets are explored. Interested staff from the various C/CAG member agencies can ask questions, share problems and solutions, and provide important information and feedback among themselves. Further details regarding the description, deliverables and budget for this subtask are provided below in Table 2.1.

Bonnie de Berry will continue to serve as EOA's lead for facilitation of the WAM Subcommittee and related work under this subtask. Bonnie has extensive experience with facilitating this subcommittee for SMCWPPP and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara).

SUBTASK SMC612.06: PARKS MAINTENANCE AND INTEGRATED PEST MANAGEMENT (IPM) WORKGROUP

EOA will continue to facilitate and provide staff support to one annual 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 member agencies to share information related to implementing pesticide toxicity controls. Currently, the Workgroup is mostly attended by parks maintenance staff, and focuses on pest management issues in municipal parks, landscapes, and rights-of-way. In addition, EOA utilizes these meetings to provide guidance on all of the requirements in C.9 and the associated reporting needs, including requirements for:

- IPM Policies;
- tracking and reporting quantities of pesticides of concern used (MRP 3.0 add neonicotinoids to the list of pesticides of concern);
- training municipal employees and requiring contractors to implement IPM (MRP 3.0 continues to focus on pesticides that are used for structural pest control, e.g., addressing pests such as rodents, ants, and cockroaches in municipal buildings);
- interfacing with County Agricultural Commissioners;
- public outreach;
- track and participate in relevant regulatory processes; and
- evaluating pesticide source control actions.

EOA will also continue to provide as needed guidance on MRP requirements to C/CAG member agencies, including review of IPM policies, guidance on pesticide use on municipal properties, etc.

MRP Provision C.9.g. requires Permittees to evaluate the effectiveness of the pesticide control measures implemented by their staff and contractors, evaluate attainment of pesticides concentration and toxicity targets for water and sediment from monitoring data (collected by Permittees, research agencies, and/or State agencies), and identify additions and/or improvements to existing control measures needed to attain targets. The MRP states that this task is necessary to gauge how effective the implementation actions taken by Permittees are in (1) achieving TMDL targets and (2) avoiding future pesticide-related toxicity in urban creeks. Permittees are therefore required to conduct an evaluation of their IPM efforts, how effective those efforts appear to be, and how they could be improved.

With the FY 2024/25 Annual Report, Permittees are required to report the evaluation results, including an assessment of the effectiveness of their IPM efforts required in the Provisions C.9.a. – C.9.e., a discussion of any improvements made in these efforts in the preceding five years, and any changes in water quality including pesticide toxicity in urban creeks. The evaluation must also include a brief description of one or more pesticide-related area(s) the Permittees will focus on enhancing during the subsequent permit term.

As part of the PM&IPM Workgroup, in FY 2024/25, EOA will work with the Permittees to conduct this evaluation and prepare a report documenting the results. Further details regarding the description, deliverables and budgets for this subtask are provided below in Table 2.1.

Vishakha Atre will continue to serve as EOA's lead for facilitation of the PM&IPM Workgroup and related work under this subtask, including development of the Pesticide Evaluation Report. Vishakha has extensive experience with facilitating this subcommittee for the Countywide Program and similar committees for stormwater programs in other Bay Area counties (e.g., Santa Clara).

SUBTASK SMC612.07: PUBLIC INFORMATION AND PARTICIPATION SUBCOMMITTEE

SGA will lead this subtask and provide staff support for the Countywide Program’s Public Information and Participation (PIP) Subcommittee, develop the outreach sections of the SMCWPPP Annual Report, and review and provide comments on C/CAG member agency draft Annual Reports. The PIP Subcommittee will not meet in FY 2024/25, but SGA will provide the Subcommittee with quarterly updates on current outreach efforts, upcoming initiatives, and ways to participate. EOA will work closely with SGA to coordinate PIP activities with the activities of all of the Countywide Program’s other committees, subcommittees, and workgroups. Further details regarding the description, deliverables and budgets for this subtask are provided below in Table 2.1.

Table 2.1 Descriptions, deliverables, and cost estimates for Subcommittee Support subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC612.01: MUNICIPAL MAINTENANCE SUBCOMMITTEE			
FY 2024/25	EOA will facilitate one Municipal Maintenance Subcommittee meeting in FY 2024/25, including working with the chair to develop a meeting agenda, prepare meeting materials (e.g., handouts and presentations), participating in the meeting, and preparing a meeting summary that include action items agreed upon during the meeting. Between meetings, EOA will provide on-call assistance to municipal staff members 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, reminders of permit deadlines such as corporation yard inspections due), and maintain the Subcommittee contact list. EOA staff will also participate on behalf of C/CAG's member agencies in applicable BAMSC and regional groups. In addition, EOA will prepare the content for the section of the Countywide Annual Report that addresses MRP Provision C.2.	<ul style="list-style-type: none"> • Facilitation of one annual Municipal Maintenance Subcommittee meeting, including meeting agenda, other meeting materials, and meeting summary. • On-call communications with municipal staff, periodic communications to the Subcommittee of pertinent information, and updates to the Subcommittee contact list. • Participation on behalf of C/CAG's member agencies in applicable BAMSC committees. • Countywide Annual Report content addressing MRP Provision C.2. • Annually updated Municipal Maintenance Subcommittee scope/budget. 	\$9,164
SUBTASK SMC612.02: NEW DEVELOPMENT & CONSTRUCTION SUBCOMMITTEE			
FY 2024/25	EOA will facilitate two NDS meetings in FY 2024/25, 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 action items agreed upon during the meetings. EOA will maintain the NDS contact list. EOA staff will also participate on behalf of C/CAG's member agencies in the BAMSC Development Subcommittee and other pertinent regional meetings. In addition, EOA will prepare the content for the section of the Countywide Annual Report that addresses MRP Provisions C.3, C.6, C.13.a, and C.21. EOA will submit the annual report to the San Mateo County Mosquito and Vector Control District on behalf of the C/CAG member agencies. EOA will also update as needed the development-related pages of the SMCWPPP website and provide technical on-call support for permittee staff on development-related issues (C.3, C.6, C.13.a, C.21) up to the available budget.	<ul style="list-style-type: none"> • Facilitation of two 2-hour NDS meetings, including meeting agendas, other meeting materials, and meeting summaries. • Updates to the NDS contact list. • Participation on behalf of C/CAG's member agencies in the BAMSC Development Subcommittee and other C.3-related regional meetings (up to 6 total) and brief meeting summaries for C/CAG Program Director. • Countywide Annual Report content for the section addressing MRP Provision C.3, C.6, C.13.a, C.21. • Annual Report to the County Mosquito and Vector Control District (submitted each year by September 30). • Updates to the SMCWPPP website development-related webpages, as needed. • Annually updated NDS scope/budget. 	\$25,086

SUBTASK SMC612.03: COMMERCIAL/INDUSTRIAL/ILLCIT DISCHARGE SUBCOMMITTEE			
FY 2024/25	EOA will facilitate two CII Subcommittee meetings in FY 2024/25, 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 includes action items agreed upon during the meetings. EOA will maintain the CII Subcommittee contact list. EOA will also prepare the content for the section of the Countywide Program Annual Report that addresses MRP Provisions C.4, C.5, C.13.b and c., and C.15. In addition, EOA will annually update the mobile business enforcement action table and mobile business inventory on the CII section of the member's only portion of the SMCWPPP website, but only with information on businesses provided by San Mateo County Permittees.	<ul style="list-style-type: none"> Facilitate two CII Subcommittee meetings, including meeting agenda, other meeting materials, and meeting summary. Updates to the CII contact list. Countywide Annual Report content for the section addressing MRP Provisions C.4, C.5, C.13.b and c., and C.15. Updates to the mobile business enforcement action table and mobile business inventory on the CII section of the member's only portion of the SMCWPPP website, but only with information on businesses provided by San Mateo County Permittees. Annually update CII Subcommittee scope/budget. 	\$32,328
SUBTASK SMC612.04: TRASH SUBCOMMITTEE			
FY 2024/25	EOA will facilitate quarterly Trash 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 action items agreed upon during the meeting. Between meetings, EOA will provide on-call assistance to municipal staff members 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 Annual Report that addresses MRP Provision C.10. In addition, EOA will periodically provide the webmaster with the information needed to update the Countywide Program's website.	<ul style="list-style-type: none"> Participation in quarterly Trash Subcommittee meetings, meeting 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 Annual Report content for the section addressing MRP Provision C.10. Annually updated Trash Subcommittee scope/budget. 	\$22,608
SUBTASK SMC612.05: WATERSHED ASSESSMENT AND MONITORING SUBCOMMITTEE			
FY 2024/25	EOA will facilitate annual WAM 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 action items agreed upon during the meeting. Between meetings, EOA will provide on-call assistance to municipal staff members by responding to their emails and telephone calls, communicate pertinent information to the Subcommittee via email, and maintain the Subcommittee contact list. In addition, EOA will prepare the content for the section of the Countywide Annual Report that addresses MRP Provision C.8. This is typically a very short summary that is expanded upon in the Provision C.8 deliverables that are scoped and budgeted separately under Task SMC617 (e.g., Urban Creeks Monitoring Reports).	<ul style="list-style-type: none"> Participation in annual WAM Subcommittee meeting, meeting agenda, other meeting materials, and meeting summary. On-call communications with municipal staff, periodic communications to the Subcommittee of pertinent information, and updates to the Subcommittee contact list. Countywide Annual Report content for the section addressing MRP Provision C.8. Annually updated WAM Subcommittee scope/budget. 	\$5,108

SUBTASK SMC612.06: PARKS MAINTENANCE AND INTEGRATED PEST MANAGEMENT WORK GROUP			
FY 2024/25	EOA will facilitate one PM&IPM Workgroup meetings per year, including working with the chair to develop the meeting agenda, prepare meeting materials (e.g., handouts and presentations), participate in the meetings, and prepare meeting summaries that include action items agreed upon during the meeting. EOA will provide on-call assistance to municipal staff members 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.	<ul style="list-style-type: none"> • Facilitate 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 addressing MRP Provision C.9. • Updated Pesticide Tracking template. • Annually updated PM&IPM Workgroup scope/budget. • Pesticide Effectiveness Evaluation Report. 	\$4,602
	In FY 2024/25, EOA will develop the Pesticide Effectiveness Evaluation Report, which must be submitted with the subsequent Annual Report (September 30, 2025).		\$12,256
SUBTASK SMC612.07: PUBLIC INFORMATION AND PARTICIPATION SUBCOMMITTEE			
FY 2024/25	<p>The PIP Subcommittee will not meet in FY 2024/25, but SGA will provide the Subcommittee with quarterly updates on current outreach efforts, upcoming initiatives, and ways to participate. SGA will provide a materials list and support individual C/CAG member agencies with outreach material requests, twice a year within a limited timeframe. SGA will support Annual Report preparation and review, including preparation of Section 7, Section 9 (outreach), and Section 16 of the SMCWPPP Annual Report. SGA will review and edit C/CAG member agencies' Annual Reports. SGA will meet monthly with the C/CAG Program Director and complete administrative tasks for the project.</p> <p>Please note that Quarterly and Annual PIP Meetings as well as coordination and facilitation of meetings have been discontinued for this year.</p>	<ul style="list-style-type: none"> • Draft 4 quarterly updates and disseminate to SMCWPPP PIP subcommittee. • Review and comment on PIP members' Annual Reports outreach sections. • Develop SMCWPPP Annual Report sections for C.7, C.9, and C.15 requirements. • Conduct monthly updates and meetings with the C/CAG Program Director. • Annually updated PIP Subcommittee scope/budget. 	\$33,496

Table 2.2. Schedule for completing Subcommittee Support subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC612.01	Municipal Maintenance Subcommittee													
SMC612.02	New Development & Construction Subcommittee													
SMC612.03	Commercial/Industrial/Illicit Discharge Subcommittee													
SMC612.04	Trash Subcommittee													
SMC612.05	Watershed Assessment and Monitoring Subcommittee													
SMC612.06	Parks Maintenance/IPM Work Group													
	- Pesticide Effectiveness Evaluation Report													
SMC612.07	Public Information and Participation Subcommittee													

Table 2.3. Estimated costs for completion of Subcommittee Support subtasks and deliverables.

Subtask	EOA Staff Position														EOA Expenses	SGA Labor & EOA markup	Budget		
	Hourly Rate:	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant				Technician	Clerical
FY 2024/25																			
SMC612.01	Municipal Maintenance Subcommittee	--	32	--	--	--	--	--	--	--	--	8	--	--	--	--	\$100	--	\$9,164
SMC612.02	New Development & Construction Subcommittee	--	20	--	--	--	82	--	--	--	--	12	--	--	--	--	\$200	--	\$25,086
SMC612.03	Commercial/Industrial/Illicit Discharge Subcommittee	--	80	--	--	--	40	--	--	--	--	24	--	--	--	--	\$200	--	\$32,328
SMC612.04	Trash Subcommittee	32	--	--	--	--	64	--	--	--	--	--	--	--	--	--	\$400	--	\$22,608
SMC612.05	Watershed Assessment and Monitoring Subcommittee	--	--	12	--	--	4	--	--	--	--	8	--	--	--	--	\$100	--	\$5,108
SMC612.06	Parks Maintenance and IPM Work Group	--	--	2	--	12	--	--	--	--	--	8	--	--	--	--	\$100	--	\$4,602
	- Pesticide Effectiveness Evaluation Report	--	--	12	--	24	--	--	--	--	--	24	--	--	--	--	\$100	--	\$12,256
SMC612.07	Public Information and Participation Subcommittee	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	\$0	\$33,496	\$33,496
		32	132	26	0	36	190	0	0	0	8	76	0	0	0	0	\$1,200	\$33,496	\$144,648

TASK SMC613 – TRAINING

For Training, the following sections describe EOA's understanding of the task and approach, the roles and expertise of our project team members, and our scope-of-work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

EOA has planned and facilitated numerous successful technical and educational training workshops for SMCWPPP and other Bay Area clients over the past two decades. The workshops have covered the full range of municipal stormwater permit compliance topics. Through this extensive experience, EOA has developed well-established procedures for training workshop planning and implementation and a thorough understanding of municipal staff's training needs. Objectives for training include assisting member agencies to meet specific MRP requirements, educating municipal staff on new requirements in the reissued permit, informing staff about SMCWPPP policies, procedures or findings, and providing orientation or refresher trainings, especially in light of inevitable municipal staff turnover.

EOA will continue to work with the appropriate subcommittees to plan and implement a training program with a schedule that is tied to MRP compliance priorities. Based on EOA's experience working with subcommittees to plan training workshops, it is essential to leverage efforts from individual member agency representatives and the workshop facilitation approach may be adapted based on member agency staff availability. Thus, EOA staff's familiarity with the individual agencies in San Mateo County and their representatives helps us to optimize the cost-effectiveness of training workshops. EOA staff's knowledge of all MRP elements also allows us to invite EOA staff from other subject areas to present at trainings. Past examples include having water quality monitoring staff present at a CII inspector training on the health of San Mateo County creeks and how the inspectors' activities help protect creek habitat, having EOA staff involved in PCBs demolition program development present at a Construction Site Inspector training, or having EOA staff involved in Green Infrastructure (GI) present on maintenance of bioretention areas at an Integrated Pesticide management (IPM) or municipal maintenance staff training.

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 a strong knowledge of the target audience. For example, EOA understands that municipal maintenance staff respond best to training involving field exercises. Construction site inspectors and staff performing activities related to IPM desire 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, in the past we have balanced that need with cost savings of providing informal trainings in the field without formal presentations. For three FYs (FY 20/21 - FY 22/23) all training workshops were held virtually. EOA utilized both Zoom Meeting and Webinar platforms for trainings, including breakout rooms for smaller exercises or discussions. One benefit of these virtual trainings is the ability to record trainings for future use by municipal staff that cannot attend. A downside is that there tends to be less interaction with attendees during the workshops. EOA utilizes poll questions throughout virtual workshops to keep attendees engaged. Beginning in FY 23/24, with in-person trainings possible, EOA staff will evaluate the best platform for each training. For example, an in-person training may be preferred for Construction Site Inspectors to incorporate a field session and a virtual training may be preferred for a New Development training to allow a large number of both municipal staff and development consultants to attend. If appropriate, EOA will utilize a hybrid platform to encourage in-person attendance for field or group exercises but allow virtual attendance and recording of classroom style presentations.

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. In addition to evaluation forms, EOA may

utilize “before” and “after” quizzes to gauge if important topics were effectively communicated to workshop attendees.

PROJECT TEAM ROLES AND EXPERTISE

Bonnie de Berry, EOA’s project manager for C/CAG work, will serve as the overall coordination leader for the Training task. Kristin Kerr, P.E., will continue to serve as EOA’s lead for the Municipal Maintenance and Business Inspection and Illicit Discharge Training Programs. Kristin has extensive experience with facilitating trainings for the Countywide Program and similar trainings for stormwater programs in other Bay Area counties (e.g., Santa Clara). Peter Schultze-Allen will continue to serve as EOA’s lead for the New Development and Construction Site Management Training Program, with support from Jill Bicknell. Both Peter and Jill have extensive experience with facilitating C.3 and C.6 training for the Countywide Program and similar trainings in other Bay Area counties (e.g., Santa Clara). Other EOA technical experts will assist in training workshops as needed. EOA does not plan to use subcontractors for this task.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for Training are described in Table 3.1. Table 3.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 3.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

SUBTASKS SMC613.01 AND SMC613.02: SELECTED FY 2024/25 TRAININGS

Under these subtasks, EOA will conduct two selected FY 2024/25 training workshops. Early in the fiscal year EOA will work with the Program Director to prioritize potential training topics based on MRP compliance priorities and recently completed trainings, and evaluate the best use of the available budget to identify the selected FY 2024/25 training workshops. General categories of trainings to select from include the following (note that Annual Reporting training will not be conducted in FY 2024/25 and trainings related to Trash Load Reductions are included in Task SMC618):

- Municipal Maintenance Training
- Business Inspection and Illicit Discharge Training
- New/Redevelopment Training
- Construction Site Management Training
- IPM Landscape Pest Control Training

Considerations for prioritizing potential training topics include:

- Recent training accomplishments will be reviewed, such as the trainings for Annual Reporting, New/Redevelopment, Private Land Drainage Area (PLDA) trash inspections (C.10.(a).ii.(b)), Business Inspection and Illicit Discharge (C.4/C.5), and IPM (C.9) held in FY 2023/24.
- MRP Provision C.2.e. requires training related to rural roads twice within the permit term.
- MRP Provision C.2.h. is a new subprovision that requires training for relevant municipal staff on seven topic areas at least once within the 5-year permit term.
- Provision C.4.e. requires annual focused training for industrial and commercial site inspectors and illicit discharge detection and elimination (IDDE) inspectors. At a minimum, the inspection training 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 at various industrial and commercial facilities.

- Since BIPs and ERPs are jurisdiction-specific, it would be difficult to provide a countywide training for these topics. EOA has provided guidance material to the CII Subcommittee on how to meet the annual training requirements through self-training activities.
- C.15.b.iii. Emergency Firefighting Discharges requires training by June 30, 2027 for municipal staff that participate in containment and cleanup of firefighting water and foam discharges.
- Municipal Parks Maintenance staff frequently use SMCWPPP IPM training workshops to obtain continuing education credits to maintain their pesticide applicator license. In each Annual Report, Permittees are required to report on the number of staff that received training. Many Permittees use the SMCWPPP IPM training workshop to meet this requirement.

Table 3.1 Descriptions, deliverables, and cost estimates for Training subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC613.01: SELECTED FY 2024/25 TRAINING			
FY 2024/25	Conduct one selected FY 2024/25 training workshop in person. Early in the fiscal year EOA will work with the Program Director to prioritize potential training topics and identify the FY 2024/25 training workshop.	<ul style="list-style-type: none"> • Workshop deliverables (see footnote 1). 	\$20,365
SUBTASK SMC613.02: SELECTED FY 2024/25 TRAINING			
FY 2024/25	Conduct one selected FY 2024/25 training workshop virtually.	<ul style="list-style-type: none"> • Workshop deliverables (see footnote 1). 	\$19,603

¹Typical workshop deliverables include:

- Draft and final workshop flyer and agenda;
- Coordinate workshop location and provide food catering services, if relevant;
- Presentations prepared and given by EOA staff and outside speakers arranged;
- Workshop materials (e.g., folders with various handouts including evaluation forms);
- Staffing and facilitation of the workshop;
- Summary of the completed evaluation forms;
- Workshop materials submitted for posting on the Countywide Program's website.

Table 3.2. Schedule for completing Training subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25											
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
SMC613.01	Selected FY 2024/25 Training	Planning	Training date TBD										
SMC613.02	Selected FY 2024/25 Training	Planning	Training date TBD										

Table 3.3. Estimated costs for completion of Training subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Budget
	Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical		
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77		
FY 2024/25																	
SMC613.01 Selected FY 2024/25 Training	--	24	8	--	--	--	24	--	--	--	32	--	--	--	13	\$1,500	\$20,365
SMC613.02 Selected FY 2024/25 Training	--	32	8	--	--	--	25	--	--	--	24	--	--	--	8	\$215	\$19,603
	0	56	16	0	0	0	49	0	0	0	56	0	0	0	21	\$1,715	\$39,968

TASK SMC614 – GI AND REGIONAL COLLABORATIVE PROGRAM PLANNING

For GI and Regional Collaborative Program Planning, the following sections describe the project team's understanding of the task and approach, the roles of our team members and their expertise, and the scope-of-work (including subtask deliverables and budgets).

UNDERSTANDING AND APPROACH

San Mateo County Permittees have been on the forefront for advancing implementation of stormwater management measures at parcel, street, and regional scales, and have recognized the value of collaboration on a countywide or watershed level. This task is focused on continuing to provide support, tools, and resources to permittees for GI/LID implementation at all scales, including public and private projects, while continuing to advance regional collaboration approaches and meet permit requirements. The recently adopted MRP 3.0 includes extensive new requirements for Regulated Projects and specifies GI greened acres retrofit targets for San Mateo County Permittees totaling 43.3 acres countywide during the permit term. EOA was instrumental in supporting C/CAG staff and representing Permittee interests throughout the MRP negotiation process and our team has a strong understanding of C/CAG's goals, needs, and challenges for the coming permit term, as described below.

Green Infrastructure Planning

C/CAG currently has a suite of exemplary tools and resources to help Permittees comply with MRP requirements. EOA developed SMCWPPP's first C.3 Technical Guidance and subsequent updates, and in 2021 completed transformation of the guidance into the C.3 Regulated Projects Guide (C3RPG), a companion document to the GI Design Guide (GIDG). EOA also contributed to the development of the GIDG. During FY 2022/23 and 2023/24, the C3RPG was updated to reflect the changes to Regulated Project requirements in MRP 3.0 (effective July 1, 2023) and current best practices for LID measure design and maintenance. The GIDG was also updated in FY 2023/24 to provide consistency with the C3RPG, MRP 3.0 and other minor edits. Plans to enhance the library of typical GI details, incorporate elements of the San Mateo Countywide Sustainable Streets Master Plan (SSMP), and include technical guidance related to regional project elements in the GIDG were put on hold due to budget limitations.

As part of the SSMP team, Paradigm led development of the groundbreaking GI Tracking Tool. Paradigm worked closely with EOA, who has years of experience supporting C/CAG and jurisdictions with annual reporting, to develop a system that provides web-based visualization and tracking of implemented GI projects and can provide essential information to aid in efficient tracking and reporting. Paradigm leveraged their experience developing the countywide Reasonable Assurance Analysis (RAA) model to enable the GI Tracking Tool to provide modeling and quantification of the benefits of individual projects, including metrics directly related to stormwater volume management goals reported by the RAA and countywide GI Plans. Presently, Paradigm and EOA are supporting C/CAG in performing updates to the GI Tracking Tool such as adding "greened acres" tracking, consistent with metrics proposed in MRP 3.0. Through this experience, we will continue supporting C/CAG with updates to the GI Tracking Tool that improve functionality and support jurisdictional and countywide efforts for GI implementation and reporting, up to the available budget for this task, while providing an important tool for communication to stakeholders and the community regarding the progress and benefits of GI implementation.

The EOA project team also includes the lead developers of C/CAG's LSPC/SUSTAIN modeling tools supporting the countywide RAA (Paradigm) and has used the tools to inform various GI implementation planning efforts within the County, including GI Plans, conceptual GI project designs, climate change analysis supporting the SSMP, flood resiliency planning, and methods used by the GI Tracking Tool to quantify stormwater capture and climate resiliency benefits of GI projects. EOA project team members served as principal authors of the Bay Area RAA Guidance Document in collaboration with the Water Board to address provisions of the MRP. With our team's strong understanding of the RAA requirements and models, we can efficiently and effectively support C/CAG with the necessary updates to the modeling system that address emerging requirements of MRP 3.0, while considering countywide GI planning goals

and initiatives. For example, as principal developers of LSPC and SUSTAIN for EPA, Paradigm staff can perform any necessary updates to model codes to address any needed functionalities for the RAA or represent the unique characteristics of countywide watersheds, pollutant sources, or planned GI projects. Our team can also ensure seamless linkages to the GI Tracking Tool to provide consistent quantification of metrics (i.e., volumes, greened acres) needed for implementation tracking and reporting.

Another essential component of GI planning is education and outreach to agency staff, elected officials, and the public. The EOA project team (EOA and SGA) will help C/CAG and Permittees increase the visibility of their GI projects, raise awareness of GI, and encourage public engagement and support for GI projects and funding. We will work with C/CAG staff to develop vibrant, easy-to-understand, and engaging presentations, visuals, and materials, up to the available budget for this task, and ensure that technical information in outreach materials and web pages is written and visualized in a comprehensible and appealing manner. Our team members have extensive experience with GI outreach and presentations, have developed C/CAG's award-winning website, and have assisted with public outreach efforts such as the rain barrel rebate program.

For cost-effective and compliant implementation, the GI Planning tasks will need to be closely coordinated with the mercury and PCBs load reduction efforts (Task SMC619), the public information and outreach program (Task SMC616), and the trash load reduction efforts (Task SMC618). The EOA project team has submitted proposed scopes for each of these tasks and is uniquely positioned to accomplish this key integration and coordination.

Regional Collaborative Program Planning

The goal of this task is to support the continuing development of a Regional Collaborative Program (RCP), building on the Advancing Regional-Scale Stormwater Management in San Mateo County project. Geosyntec developed an RCP framework as part of the project that combines an MOU and market-based approach. The RCP would promote investment in Regional Collaborative Projects to provide multiple benefits that could be translated into units of exchange. For the initial MOU based program, these units of exchange would be cost-shared by MOU participants established through program agreements. As the market-based program is rolled out, units of exchange could also be purchased by other buyers. The resulting purchases or ongoing payments would be dedicated to a Capital and Administrative Fund, which would fund infrastructure capital investments and program administration, as well as ongoing O&M of RCP infrastructure. If a market-based program is fully developed, the initial units of exchange shared through MOUs would be retired and the Program would only operate in a market-based framework. Geosyntec and EOA have been supporting the City of San Pablo in developing a Regional Compliance Program for Contra Costa County and will apply this expertise to continuing the development of the San Mateo Program.

The RCP MOU-based program and report were completed in FY 2022/23, but due to budget limitations, efforts on the market-based program have been on hold and will not be funded through the EOA project team contract in FY 2024/25. However, discussion of regional projects and programs will continue as part of a newly formed regional Long Term GI Goals Technical Working Group (TWG). The TWG will bring permittees, Water Board staff, EPA staff, and other technical advisors together to set long term GI implementation goals for the Bay Region, which will be used to set GI numeric retrofit targets for future permit terms.

PROJECT TEAM ROLES AND EXPERTISE

Effective GI planning requires an in-depth knowledge of planning practices, project design and implementation, prioritization analysis and mapping, pollutant load reduction, financing, and outreach. As demonstrated in the SOQ, EOA has assembled a highly qualified team to meet C/CAG's needs for GI and Regional Collaborative Program Planning, which includes Paradigm, Geosyntec, SGA, and SCI. The EOA project team has the interdisciplinary staff that understands and can provide competent cost-effective assistance with the tasks for C.3 compliance in San Mateo County.

Jill Bicknell, P.E. of EOA will serve as the task leader. Jill has nearly 30 years of experience in the field of stormwater quality management for land development projects and is a leader for LID/GI planning and implementation in the Bay Area. She has assisted SMCWPPP with C.3 compliance and LID/GI planning and design guidance for over 15 years. Peter Schultze-Allen, Vishakha Atre, and other EOA staff will assist with this task as appropriate. Paradigm will lead the maintenance and update of the GI Tracking Tool and LSPC/SUSTAIN modeling tools using their expertise described above. SGA (Michelle Dissel) will assist EOA with GI outreach efforts and ensure consistency in outreach products and website design. Geosyntec (Kelly Havens and Lisa Austin) will take the lead on the Regional Collaborative Planning subtasks, building on their recent work to develop the Regional Collaborative Program Framework White Paper and related efforts, with technical and workgroup coordination support from EOA. SCI (Chris Coulter) can bring expertise in municipal finance to assist with the evaluation of innovative funding and finance mechanisms for regional scale stormwater management, if needed and budget is available.

SCOPE OF WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for this task are described in Table 4.1. Table 4.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 4.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA staff labor hours and expenses, including estimated subcontractor costs.

During FYs 2022/23 and 2023/24, significant progress was made on development of the initial MOU-based RCP and analysis of its application to a case study (the Orange Memorial Park Stormwater Capture Facility). However, due to budget constraints and the need to prioritize MRP compliance tasks, the work on the market-based RCP was put on hold for FY 2024/25. The focus of the work for this task in FY 2024/25 will be: 1) maintaining and making specific updates to the GI Tracking Tool; 2) implementation of the work plan for updating the RAA model that is currently under development; 3) continued outreach to the public on GI; and 4) participation in regional Workgroups and meetings with Water Board staff on topics related to implementation of GI and regional stormwater capture projects.

Table 4.1 Descriptions, deliverables, and cost estimates by fiscal year for GI and Regional Collaborative Program Planning subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	COST ESTIMATE
SUBTASK SMC614.01: GI PLANNING – UPDATES TO GI DESIGN GUIDE AND C3 REGULATED PROJECTS GUIDE			
FY 2024/25	No tasks planned for FY 2024/25 due to budget limitations and since updates to the GIDG and C3RPG were completed in recent fiscal years.		\$0
SUBTASK SMC614.02: GI PLANNING – MAINTAIN/UPDATE GI TRACKING TOOL			
FY 2024/25	<ul style="list-style-type: none"> • Data Updates - EOA will continue to work with C/CAG member agencies to collect information on LID treatment measures on regulated projects constructed during the previous fiscal year as well as constructed GI projects, for entry into the GI Tracking Tool. The EOA Team will draw constructed project boundaries/drainage areas in GIS and ensure new data are accurately incorporated into the Tracking Tool. • Tool Maintenance/Updates – Paradigm will continue Tool maintenance and will consider the following Tool updates (described in the GI Tracking Tool Work Plan) depending on the remaining budget after updates to the RAA model are implemented (see subtask SMC614.03) and with concurrence from EOA and C/CAG staff. The following functional areas will be considered: <ul style="list-style-type: none"> ○ Communication – The Communication functional area will include updates to the GI Tracking Tool to consider additional features, strategic communication, and/or graphics to further engage stakeholders on regional investments in GI and the multiple benefits realized. ○ Reporting – The Reporting functional area provides efficiencies or automated procedures to produce summaries of GI implementation progress and metrics for each jurisdiction, each watershed, or countywide. ○ Crediting/Trading – The Credit/Trading functional area includes updates to support agencies with GI project planning and potential trading or crediting of metrics associated with regional projects to multiple jurisdictions within a project’s drainage area, in coordination with the Regional Collaborative Program. ○ Asset Management – The Asset Management functional area will provide updates/enhancements to the GI Tracking Tool that are needed to support permittees in complying with MRP 3.0 Asset Management Plan requirements. ○ Trash Load Reductions – The Trash Load Reductions functional area will provide enhancements to the GI Tracking Tool to incorporate tracking and/or modeling of trash load reduction benefits of GI at various scales (e.g., regional stormwater capture pretreatment, road, and parcel GI projects). 	<ul style="list-style-type: none"> • Completed data entry and QA (including drawing project boundaries in GIS) for FY 2023/24 constructed projects. • Completed GI Tracking Tool updates approved by the project team and C/CAG staff and within available budget. 	\$30.370

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	COST ESTIMATE
SUBTASK SMC614.03: GI PLANNING – UPDATE LSPC/SUSTAIN TOOLS FOR GI PLANNING AND RAA			
FY 2024/25	<p>Paradigm and EOA will support C/CAG with the identification and implementation of updates to the LSPC/SUSTAIN modeling system. The goal is to support C/CAG with GI planning goals and updates to the San Mateo Countywide PCB Control Measures Plan (CMP) and RAA, as needed. Most of this work will take place in FYs 2024/25 and 2025/26, in preparation for the update and submittal of the CMP, due to the Water Board on March 31, 2026.</p> <p>Paradigm is currently (FY 2023/24) preparing a work plan for updating the RAA/modeling work previously completed for C/CAG for the purpose of developing the updated CMP. In FY 2024/25, Paradigm and EOA will implement elements of the RAA/Modeling Update Work Plan approved by C/CAG. Model updates, at a minimum, will address the requirements of the MRP, including:</p> <ul style="list-style-type: none"> • Updates to Existing GI Projects – Since the development of the RAA model, C/CAG agencies have made progress towards implementing GI projects. The RAA model will be updated to incorporate the benefits of projects constructed since the RAA model was developed. • Model Recalibration – Since development of the RAA, EOA has performed further monitoring of watersheds throughout the County. Paradigm will work closely with EOA to understand the pollutant source areas addressed by these monitoring efforts and develop strategies for accurately representing these source areas within the LSPC model. Paradigm may also use the monitoring data to recalibrate the model for improved performance and accurate assessment of necessary pollutant reductions to meet TMDL goals. Additionally, the model may be recalibrated using more recent rainfall data. <p>Additional model updates may be considered if budget and schedule permit. These improvements as outlined in the work plan may consist of:</p> <ul style="list-style-type: none"> • Linkages to GI Tracking Tool – As updates to the RAA are performed, it will be critical to accurately represent implemented GI projects and current hydrologic and water quality conditions within the watersheds. Paradigm will develop tools that directly access this GI repository and automate model configuration for accurate and complete representation and accounting of implemented GI as “existing projects,” thereby reducing the amount of future planned GI necessary to meet TMDL goals. • Updates to Planned GI Projects – Jurisdictions’ GI Plans, the County’s Stormwater Resource Plan, the SSMP, and other planning efforts have identified numerous individual GI projects that can be individually configured in the modeling system to provide accurate representation of planned projects and an understanding of their combined contribution to pollutant load reductions to meet the countywide TMDL wasteload allocations. The resulting RAA update will provide a comprehensive and relevant look at the benefits of ongoing GI planning efforts and future implementation needs to meet MRP 3.0 requirements. • Regional Coordination – Paradigm may update the RAA model to integrate with other modeling efforts in the San Francisco Bay region. This may benefit C/CAG agencies by leveraging regional consensus, lessons learned, and data sharing for MRP compliance. 	<ul style="list-style-type: none"> • Meetings with C/CAG staff to identify needed updates to the RAA. • Participation in meetings with the Water Board and other countywide programs to strategize potential updates to RAA models and/or Guidance. • Updated RAA Model incorporating projects constructed since model development • Recalibrated RAA Model, including updated LSPC/SUSTAIN tools, if approved. • Additional RAA model updates as approved by project team and C/CAG. • Revised RAA report and web-based viewer documenting model updates, recalibration results, and new results to support GI Plans. • Presentations to the C/CAG Stormwater Committee to summarize progress and results of RAA updates 	\$207,393

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	COST ESTIMATE
SUBTASK SMC614.04: GI PLANNING – GI EDUCATION AND OUTREACH			
FY 2024/25	<p>SGA and EOA will help C/CAG agencies encourage the public to become more engaged and supportive of GI projects and funding. We will work with C/CAG staff to develop vibrant, easy-to-understand, and engaging materials and ensure that technical information is presented in a comprehensible and appealing manner. Specifically, SGA will conduct the following:</p> <ul style="list-style-type: none"> • Conduct outreach to find upcoming projects to support within budget; • Develop promotional campaigns or materials within allocated budget; • Develop graphics or illustrations as needed; • Continue to promote the benefit and function of GI to the public on online platforms, e-newsletters, and other collateral SGA produces • Create unique marketing and communications collateral such as one-sheets, brochures, posters, event design, evites/emails, banners, flyers, templates, and social media graphics; • Develop as-needed supplementary materials, such as handouts and creative leave-behinds; • Provide final compilation of documents in print and electronic formats as needed; • Edit and repurpose available GI videos to support campaigns; or • Provide staff support for public events related to GI. 	<ul style="list-style-type: none"> • Green infrastructure content for online platforms and e-newsletters. • Graphics and content for collateral materials. • Press releases on green infrastructure initiatives. • Staff support for public engagement events. • Booth materials and swag. 	\$11,918
SUBTASK SMC614.05: PARTICIPATE IN REGIONAL WORKGROUPS			
FY 2024/25	<p>EOA and Geosyntec will participate in regional workgroups and meetings with Water Board staff on topics related to advancement of the Regional Compliance Program (RCP) and implementation of GI and regional stormwater capture projects in general. These meetings will include continued meetings of the WARP to discuss the RCP and specific regional projects in San Mateo County, and participation in the Long-Term GI Goals Technical Working Group meetings with Water Board staff, permittees, and other stakeholders to discuss long term goals for GI retrofits that will inform requirements in future permits. Additional meetings with Water Board staff may be held to discuss the role of regional projects in attaining numeric retrofit targets for MRP 3.0, Participation in specific workgroup and meetings on behalf of C/CAG will be approved in advance by the C/CAG Program Director. This task will also include assistance to C/CAG and permittees with development of a plan for complying with MRP 3.0 GI retrofit numeric targets.</p>	<ul style="list-style-type: none"> • Participation in up to six regional workgroup meetings and additional meetings with Water Board staff as needed in FY 2024/25, up to the available budget. • Preparation of brief post-meeting summaries for reporting back to the Program Director and other SMCWPPP groups as needed (e.g., NDS and Stormwater Committee). 	\$35,969

Table 4.2. Schedule for completing GI & Regional Collaborative Program Planning subtasks and deliverables (white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC614.01	Updates to GIDG and RPG													
SMC614.02	Maintain/Update GI Tracking Tool			•										•
SMC614.03	Update LSPC/SUSTAIN Tools													•
SMC614.04	GI Education and Outreach		•					•				•		
SMC614.05	Participate in Regional Work Groups		•		•			•			•			•

Table 4.3. Estimated costs for completion of GI & Regional Collaborative Program Planning subtasks and deliverables.

Subtask	EOA Staff Position														Subconsultants (including EOA markup)			Budget		
	Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical	EOA Expenses	Paradigm		Geosyntec	SGA
	Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77				
FY 2024/25																				
SMC614.01	Updates to GIDG and RPG	--	--	--	--	--	--	--	--	--	--	--	--	--	--	\$0	\$0	\$0	\$0	\$0
SMC614.02	Maintain/Update GI Tracking Tool	--	4	--	--	12	--	--	--	8	--	54	--	--	--	\$300	\$16,500	\$0	\$0	\$30,370
SMC614.03	Update LSPC/SUSTAIN Modeling Tools	8	16	--	--	12	--	--	--	--	--	--	--	--	--	\$200	\$198,501	\$0	\$0	\$207,392
SMC614.04	GI Education and Outreach	--	4	--	--	16	--	8	--	--	--	--	--	--	--	\$50	\$0	\$0	\$5,500	\$11,918
SMC614.05	Participate in Regional Work Groups	--	64	8	--	2	48	8	--	--	--	--	--	--	--	\$326	\$0	\$5,365	\$0	\$35,969
		8	88	8	0	42	48	16	0	8	0	54	0	0	0	\$876	\$215,001	\$5,365	\$5,500	\$285,649

TASK SMC615 - PUBLIC INFORMATION AND OUTREACH

SGA will lead the Public Information and Outreach task. The following sections describe SGA's understanding of the task and approach, our project team member roles and expertise, and the scope of work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

The public education and outreach minimum control measure is one of six measures an operator of a municipal separate storm sewer system (MS4) is required to include in its stormwater management program to meet the conditions of its National Pollutant Discharge Elimination System (NPDES) stormwater permit. To assist C/CAG with managing its stormwater strategic outreach plan, SGA will continue to focus its efforts on increasing the knowledge among the target communities of the impacts of urban runoff on receiving waters, and the potential BMP and GI solutions for mitigating them, while at the same time raising the profile of the agency and the relationship of the agency to other water-related agencies and projects. The goals are to:

- Increase the knowledge among the target communities regarding MS4s, impacts of urban runoff on receiving waters, and potential BMP solutions for the target audience;
- Change the behavior of target communities to reduce pollutant releases to MS4s and the environment; and
- Decrease the discharge of pollutants to the MS4 by engaging the public.

SGA will continue to work with C/CAG to manage and implement outreach tactics that satisfy NPDES requirements, increase pro-environmental behavior changes and promote potential investment in green infrastructure projects. Its approach will continue to include the following:

- Community-Based Social Marketing (CBSM) as a model to increase environmental stewardship;
- Specific stormwater pollution prevention messages targeting barriers and motivators;
- Tactics and tasks coordinating outreach and education activities for diverse public communities;
- Strategies to maximize website visits, email address capture, and community involvement;
- Inclusion of creative art services, content direction, and strategy when developing outreach materials;
- Social media strategy and maintenance to increase presence and build followers;
- Youth outreach with stormwater pollution prevention targeting;
- Paid media strategies;
- Evaluation to measure the efficacy of outreach campaigns and to prepare a detailed media report describing the results;
- Coordination with other countywide programs regarding outreach; and
- Specialty marketing and promotional items to support community events and other projects.

PROJECT TEAM ROLES AND EXPERTISE

Stephen Groner, P.E., will be the overall Project Director for SGA. Michelle Dissel will serve as the task leader. Michelle will be assisted by Paige Rosenberg. Paige has been assisting with managing the public education and outreach program for SMCWPPP since 2018.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables, and budgets for Public Information and Outreach are described in Table 5.1. Table 5.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and C/CAG member agencies' needs. SGA will work closely with EOA's Project Manager and the Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both

compliance and internal schedules are achieved. Table 5.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and SGA staff labor hours and expenses.

Table 5.1 Descriptions, deliverables, and cost estimates for Public Information and Outreach subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC615.01: STRATEGIC OUTREACH PLAN			
FY 2024/25	SGA will provide a review of the five-year Strategic Outreach Plan and associated tactics and periodically update as needed. SGA will also revise its annual scope of work accordingly in coordination with other EOA Team members.	<ul style="list-style-type: none"> • Supplemental report on FY 2024/25 strategy and tactics including campaigns, milestones, and measurable outcomes and evaluation points. • Revised and updated annual scope of work. 	\$3,238
SUBTASK SMC615.02: WEBSITE AND SOCIAL MEDIA			
FY 2024/25	SGA will continue managing and updating the Countywide Program’s website including: <ul style="list-style-type: none"> • Create, develop, and manage content for C/CAG’s web presence. • Maintain a consistent look and feel. • Draft topical, educational blog posts as needed. • Copyedit and proofread all web content. • Research and update events calendar. • Keep current with emerging web technologies and apply best practices. • Provide technical support and functionality fixes when needed; • Respond to community members’ questions, concerns, and comments via submitted online forms. • Support permittees by updating the PCB data submission database. • Track and report on all site metrics. SGA will continue managing the Countywide Program’s social media program: <ul style="list-style-type: none"> • Establish a consistent, trustworthy presence on all online channels. • Develop and run Facebook and Instagram regularly with local stormwater-related content, watershed partner information and images, and PIP member content. • Run Facebook/Instagram/Nextdoor ads to generate greater engagement and reach. • Research, write, and post content to social media channels and track performance. • Create and send informative seasonal e-newsletters to subscribers. 	<ul style="list-style-type: none"> • Consistent, trustworthy presence for the Countywide Program on all channels. • Editorial calendar for social media platforms with updated stormwater-related content and images with posting twice weekly on Facebook and Instagram. • Continued sustained growth in Facebook and Instagram followers. • Continued sustained growth in email subscribers. • Up to 4 blog posts. • 4 e-newsletters and 4-6 eblasts. • Approximately 80K pageviews of the website. • Ongoing website updates. • Promotional ad campaigns to promote events • Promotional ad campaigns to promote and engage on pollutants or topics of concern. 	\$58,384

Table 5.1 Descriptions, deliverables, and cost estimates for Public Information and Outreach subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC615.03: OUTREACH MATERIALS			
FY 2024/25	<p>SGA will continue with the following tasks in relation to outreach materials:</p> <ul style="list-style-type: none"> • Coordinate tasks and create creative briefs. • Design and copywriting material and collateral to support outreach campaigns and events. • Present initial concepts and first drafts to C/CAG for review. • Revise and edit material based on feedback from C/CAG. • Produce approved materials and distribute to appropriate stakeholders. • Maintain storage unit, research, order, and keep inventory of outreach materials and distribute 2 X a year in a cost-effective manner. 	<ul style="list-style-type: none"> • Digital and social media ads. • Print ads, brochures, fact sheets, flyers, newsletters, door hangers, and direct mail. • Email marketing, electronic newsletters, and website content updates Informational videos. • Social media content and contests. • Community events giveaway and swag merchandise. 	\$38,586
SUBTASK SMC615.04: EVENTS			
FY 2024/25	<p>SGA will continue to develop and implement a community engagement plan in collaboration with other organizations that includes the following:</p> <ul style="list-style-type: none"> ○ Bulk Rain Barrel Promotion program and Rain Barrel Rebate Support. ○ OWOW IPM outreach. ○ Residential Discharge: car/pool/spa/fountain. ○ School-aged outreach that includes: <ul style="list-style-type: none"> ▪ Schoolyard Greening installations of tactical GI with hands-on community workshops. ▪ Support of COE Community Grant projects. ▪ Support of COE Environmental Literacy Program. ▪ Support of San Carlos Schoolyard Greening project. ○ Outreach to pest control operators <p>SGA will continue to review existing stakeholder database and identify new stakeholders who can help promote C/CAG objectives.</p> <p>SGA will continue to distribute outreach materials and collateral.</p>	<ul style="list-style-type: none"> • 10 in-person/virtual community events/workshops. • 2 Rain Barrel/Rebate Distribution events. • 40 hours Point-of-Purchase (POP) outreach, mentoring and maintenance in stores in San Mateo County. • 2 tabling events; electronic IPM training support. • 1 Discharge Pollution Prevention BMP event; tabling/webinar/workshop. • 2-3 community-involved rain barrel/cistern installation workshops with supplies and materials for installation at school. • 2 Rain Garden/Rebate promotion webinars or workshops. • Reporting metrics and evaluation of Rain Barrel promotion and rebate redemptions. • Participation in 1 event promoting, Launching, or demonstrating GI. • Event collateral materials. • Event database. 	\$62,928

Table 5.2. Schedule for completing Public Education and Outreach subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC615.01	Strategic Plan Review	•						•						
SMC615.02	Website and Social Media	•	•	•	•	•	•	•	•	•	•	•	•	•
SMC615.03	Outreach Materials	•	•	•	•	•	•	•	•	•	•	•	•	•
SMC615.04	Outreach Events	•	•	•	•	•	•	•	•	•	•	•	•	•

Table 5.3. Estimated costs for completion of Public Education and Outreach subtasks and deliverables.

Subtask	EOA Staff Position		SGA Subcontractor												Cost Estimate		
	Hourly Rate:	Senior III	EOA Expenses	Project Director	Project Manager	Asst. Project Manager	Technical Expert	Graphic Designer	Public Relations Mngr	Multi Media Specialist	Project Coordinator	Sr. Project Associate	Project Associate	Copywriter		Outreach Specialist	SGA Expenses
FY 2024/25																	
SMC615.01		--	\$0	2	12	1	--	--	--	--	--	--	--	--	--		\$3,238
SMC615.02		--	\$0	--	55	50	--	5	--	--	3	25	95	--	100	\$3,900	\$58,384
SMC615.03		--	\$0	--	35	35	--	15	--	--	4	35	35	--	10	\$8,000	\$38,586
SMC615.04		--	\$0	2	60	80	--	20	--	10	--	--	20	--	20	\$20,143	\$62,928
		0	\$0	4	162	166		40			7	60		130	\$32,043	\$163,136	

TASK SMC616 – ANNUAL REPORTING

The following sections describe EOA’s understanding and approach towards Annual Reporting, the proposed roles of our Project Team and their expertise, and our proposed scope-of-work (including subtask deliverables and budgets).

UNDERSTANDING AND APPROACH

A key service that EOA has provided to SMCWPPP and other Bay Area municipal stormwater programs over the past two decades is assistance with annual compliance reporting. This has included the preparation of countywide program annual reports and, for individual municipal annual reports, developing guidance and templates, conducting preparation workshops, reviewing agency draft reports, and compiling and submitting reports to the Regional Water Board in compliance with the MRP. EOA’s various training and guidance efforts have been instrumental in helping Permittees reduce their exposure to Notice of Violations issued by the Regional Water Board. Our annual process of reviewing and commenting on individual draft municipal annual reports has been particularly successful.

Member agencies are also required to annually report on progress towards MRP trash load reduction benchmarks. EOA’s technical support to member agencies on this trash reporting is scoped and budgeted under Subtask SMC618.05 (Assist with Trash Annual Reporting and Load Reduction Calculations). Review of the trash control sections of member agency annual reports is also covered under Subtask SMC618.05.

PROJECT TEAM ROLES AND EXPERTISE

Bonnie de Berry will serve as the task leader for Annual Reporting, as part of her overall role as EOA’s Project Manager for providing municipal stormwater permit compliance support to C/CAG. Bonnie has extensive experience assisting the Countywide Program and San Francisco Bay Area municipal agencies with many facets of stormwater permit compliance and will be assisted by other EOA staff with relevant expertise as appropriate, including Kristin Kerr, John Fusco, and Vishakha Atre. SGA will be EOA’s subcontractor to help with public outreach aspects of Subtasks SMC616.01 (Program Annual Report) and SMC616.03 (Review Draft Permittee Annual Reports).

It should be noted that providing the services in SMC616.02 (Annual Report Guidance) and SMC616.03 (Review Draft Permittee Annual Reports) requires a thorough understanding of the various “core” permit requirements including municipal operations, new and redevelopment, industrial and commercial site controls, illicit discharge detection and elimination, construction site control, pesticide toxicity control, copper control, and conditionally exempted discharges. EOA has extensive experience and broad expertise in all municipal stormwater permit compliance areas and thorough familiarity with the MRP.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Proposed subtask descriptions, deliverables, and budgets for Task SMC616 Annual Reporting are described by fiscal year in Table 6.1. Table 6.2 provides the proposed subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and C/CAG member agency needs. EOA will work closely with the C/CAG Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 6.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

Table 6.1 Descriptions, deliverables, and cost estimates by fiscal year for Annual Reporting subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	COST ESTIMATE
SUBTASK SMC616.01: COUNTYWIDE PROGRAM ANNUAL REPORT			
FY 2024/25	EOA will prepare the Countywide Program’s Annual Report which documents all activities performed by the Countywide Program on behalf of San Mateo County Permittees during the prior fiscal year. EOA will coordinate with other C/CAG contractors, as needed, in compiling the relevant reporting information. EOA will develop a draft Annual Report for C/CAG staff and member agency review and comment and a final report for submittal by September 30th, the due date in the MRP. The budget for this task assumes that much of the content for the Annual Report will be prepared under Task SMC612 (Subcommittee Support), and that this subtask will mainly consist of obtaining, compiling, and formatting that information, preparing standard report features such as a table of contents and executive summary, and facilitating the review process.	<ul style="list-style-type: none"> • Draft of the Countywide Program’s FY 2023/24 Annual Report by September 1, 2024, and final report for submittal to Water Board by September 30, 2024. 	\$32,776
SUBTASK SMC616.02: ANNUAL REPORT GUIDANCE			
FY 2024/25	EOA will develop an annual report guidance package for member agencies to use in preparing their own 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 facets of the annual reporting process and summarizes essential dates and milestones.	<ul style="list-style-type: none"> • Annual report guidance package to member agencies and posting on Countywide Program website by mid-July 2024. 	\$9,872
SUBTASK SMC616.03: REVIEW DRAFT PERMITTEE ANNUAL REPORTS			
FY 2024/25	EOA will review and comment on draft member agency annual reports prior to submittal of final reports to the Regional Water Board. Member agencies will be required to submit a draft of their annual report to EOA by a certain date (TBD) in order to be guaranteed of the review, but as in previous years, EOA will make every effort to review and comment on draft reports that are submitted outside of the agreed upon timeframe. We assume that the planned review period will be approximately the first two weeks of September each year. SGA, as EOA’s subcontractor, will review and comment on the public outreach sections of each member agency’s annual report.	<ul style="list-style-type: none"> • Comments on Permittee draft Annual Reports. 	\$22,405
SUBTASK SMC616.04: ANNUAL REPORT SUBMITTAL PROCESS SUPPORT			
FY 2024/25	EOA will support San Mateo County Permittees with the Annual Report submittal process, including using the SMARTS system, as needed and feasible with available budget.	<ul style="list-style-type: none"> • As needed support with the Annual Report submittal process, including using the SMARTS system, as feasible within available budget. 	\$3,252

Table 6.2. Proposed schedule for completing Task 4 Annual Reporting subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC616.01	Countywide Program Annual Report	•	•	•										
SMC616.02	Annual Report Guidance	•												
SMC616.03	Review Draft Permittee Annual Reports													
SMC616.04	Submit Permittee Annual Reports			•										

Table 6.3. Estimated costs for completion of Task 4 Annual Reporting subtasks and deliverables.

Subtask	EOA Staff Position														EOA Expenses	SGA Subcontractor (including EOA markup)	Budget	
	Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician				Clerical
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77			
FY 2024/25																		
SMC616.01	Countywide Program Annual Report	--	16	32	--	--	--	--	--	--	40	--	--	--	8	\$200	\$14,192	\$32,776
SMC616.02	Annual Report Guidance	--	8	16	--	12	--	--	--	--	8	--	--	--	--	\$100	\$0	\$9,872
SMC616.03	Review Draft Permittee Annual Reports	--	24	16	--	8	12	--	--	--	40	--	--	--	--	\$200	\$1,777	\$22,405
SMC616.04	Submit Permittee Annual Reports	--	--	8	--	--	--	--	--	--	8	--	--	--	--	\$100	\$0	\$3,252
		0	48	72	0	20	12	0	0	0	96	0	0	0	8	\$600	\$15,969	\$68,305

TASK SMC617 – WATER QUALITY MONITORING

This section describes EOA's understanding of Water Quality Monitoring and describes our project team's approach to accomplishing all identified subtasks. The roles of our project team members and their expertise, and our scope-of-work (including subtask deliverables, schedules, and budgets) is also included. We will implement all aspects of the required Water Quality Monitoring activities in MRP 3.0 Provision C.8. It is important to note that Water Quality Monitoring is conducted on a water year basis. Monitoring is conducted between October 1 and September 30 of the named water year and reports presenting the foregoing water year data are submitted to the Water Board the following March. For example, for Water Year 2024 (i.e., October 2023 – September 2024) the final report is submitted March 2025. Because the fiscal year ends in the middle of the water year, field sampling associated with a particular water year may be split between two fiscal years.

UNDERSTANDING AND APPROACH

EOA has a deep understanding of the specific subtasks associated with MPR Provision C.8 compliance in San Mateo County. This understanding has been acquired through our leadership of the Workgroup that helped negotiate MRP 3.0 Provision C.8 requirements and through our 25+ years of experience managing and implementing all elements of SMCWPPP's municipal NPDES monitoring requirements with a perfect record of compliance. Although many of the monitoring requirements changed with the adoption of MRP 3.0, EOA's continuous efforts to improve monitoring efficiency and effectiveness at addressing management questions both in the short and long-term horizons set us apart. Additionally, our role in managing nearly all aspects of the MRP on behalf of SMCWPPP has allowed us to integrate water quality monitoring results with other compliance needs. For example, Pollutants of Concern (POC) Monitoring has been tailored to inform the siting of Green Infrastructure and Mercury/PCBs controls, address Provision C.11/12 requirements for investigating 1,411 acres of old industrial land uses, and implement elements of the Old Industrial Control Measures Plan (dated March 31, 2024). Over the years, EOA has built solid relationships with the municipal staff who help direct monitoring through participation in the WAM Subcommittee (see Subtask SMC612.05), provide local institutional knowledge about land use and the municipal stormwater conveyance system, and use monitoring data to inform the adaptation and evolution of stormwater management programs.

EOA's relationships outside of C/CAG and its member agencies also support Provision C.8 compliance, efficiency, and effectiveness for San Mateo municipalities. EOA manages all aspects of MRP compliance for the Santa Clara Valley Program and assists the Alameda, Contra Costa and Solano countywide programs with technical, logistical, and planning aspects of their water quality monitoring programs. The BAMSC regional partners look to EOA as the Bay Area leader in providing insightful and cutting-edge approaches to water quality monitoring. The SMCWPPP water quality monitoring program benefits from the knowledge gained from these ongoing experiences and efficiencies realized.

EOA also works closely with the San Francisco Estuary Institute (SFEI) which manages the San Francisco Bay Regional Monitoring Program (RMP), and EOA staff participates on the RMP's Technical Review Committee (TRC) and RMP Workgroups on behalf of SMCWPPP and SCVURPPP. This participation helps to ensure that RMP monitoring effectively addresses the management questions of interest to SMCWPPP and all of the BAMSC regional partners. EOA staff relationships with experts on trash monitoring (e.g., 5 Gyres) and Low Impact Development (LID) effectiveness monitoring (e.g., Southern California Coastal Water Research Project, SFEI) helps inform the development and implementation of monitoring approaches for SMCWPPP that meet the new requirements in MRP 3.0.

EOA staff is intimately familiar with the environments where water quality monitoring is conducted in San Mateo County. From the rugged and wild coastal streams draining the west side of the Santa Cruz Mountains, to the steelhead trout habitats in urban residential areas, and the engineered storm drain systems of the industrial landscape, EOA has successfully conducted monitoring in these diverse landscapes. For over 25 years, EOA staff has observed how these environments behave during storm events, respond to long-term climatic conditions, and improve as a result of stormwater management actions implemented over the years. This knowledge is leveraged to increase efficiencies in evaluating and selecting monitoring sites and to

improve the utility of water quality monitoring data. An EOA-directed monitoring program will provide multiple benefits to C/CAG member agencies beyond Provision C.8 and overall MRP 3.0 compliance.

PROJECT TEAM ROLES AND EXPERTISE

Bonnie de Berry, EOA's project manager for C/CAG work and current water quality monitoring Task Leader for SMCWPPP, will continue in this role. Bonnie is supported by a number of highly experienced senior and associate level staff at EOA, including Paul Randall, Chris Sommers, and Lisa Sabin, all with invaluable knowledge of SMCWPPP member agency needs and experience in designing and implementing water quality monitoring programs in San Mateo County. Similar to recent years, Kinnetic Environmental, Inc. (KEI) will serve as technical field work support, and Caltest, Pacific EcoRisk, Eurofins, and Enthalpy are proposed as the analytical laboratories for this task.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for Water Quality Monitoring are described below and in Table 7.1. Table 7.2 provides the subtask schedules and Table 7.3 provides a detailed cost estimate for each subtask. The scope, schedule, and costs are based on our current understanding of MRP 3.0 requirements. EOA will work closely with the C/CAG Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved.

SUBTASK SMC617.01: REGIONAL COORDINATION

Regional collaboration has been an essential part of SMCWPPP's water quality monitoring approach, is encouraged by MRP 3.0 Provision C.8.a.i, and creates opportunities for cost sharing, information exchange, and more effective planning. As we have done since before the first iteration of the MRP was adopted in 2009, EOA will assist SMCWPPP to collaborate and coordinate with other Bay Area stormwater programs on all water quality monitoring tasks during MRP 3.0 permit term. This will include representing SMCWPPP on the BAMSC Monitoring/Pollutants of Concern (MPC) Subcommittee and the LID and Trash Monitoring Workgroups, including participating in related email and telephone communications, and reviewing and developing pertinent regional documents. A major focus of these groups during FY 2024/25 will be implementation of the regionally consistent LID, Trash, and Receiving Water Limitations (RWL) Monitoring Plans that were developed in FY 2022/23 and initiated in FY 2023/24. Regionally coordinated tasks anticipated in FY 2024/25 include the development of regionally consistent Annual Trash and LID Monitoring Progress Reports, as well as continued facilitation and participating in the Trash and LID Monitoring Technical Advisory Groups (TAGs).

In accordance with Provision C.8.b, all monitoring data must be SWAMP comparable, data quality must be consistent with the SWAMP Quality Assurance Program Plan (QAPrP), and data collection and analytical methods must follow the SWAMP Standard Operating Procedures (SOPs). These requirements are included in the draft LID Quality Assurance Project Plan (QAPP) and draft Trash QAPP that were developed by the BAMS Collaborative in FY 2022/23 and FY 2023/24. For some monitoring approaches, EOA will continue to implement the BAMSAA QAPP and SOPs that were developed during MRP 1.0 and have subsequently been maintained, and the Clean Watersheds for a Clean Bay (CW4CB) QAPP. It is assumed that BAMSC RMC participants will work together in FY 2024/25 to maintain these documents throughout the term of MRP 3.0. EOA will assist with the updates on behalf of C/CAG and its member agencies. In addition, EOA will keep abreast of SWAMP procedures which are continually reviewed and updated at the State level. We will confirm that all analytical laboratories participating in the contract are using the most current requirements.

Through this task, EOA will participate in bimonthly meetings of BAMSC MPC Subcommittee and bimonthly meetings of BAMSC Trash and LID Workgroups on behalf of C/CAG and its member agencies. EOA will also work with regional partners to review pertinent policy documents and participate in related meetings. Additionally, EOA will participate in Trash and LID Effectiveness TAG meetings and contribute (via SMCWPPP in-kind consultant services), towards necessary updates to the BASMAA/BAMSC QAPPs and SOPs, the USEPA Water Quality Improvement Fund (WQIF) grant-funded Watching Our Watersheds (WOW) project, and other regional tasks needed to comply with MRP 3.0. EOA may occasionally attend relevant policy meetings (e.g., CASQA Bacteria Summit Workgroup, SWRCB Biointegrity Objectives Development,

Wetland/Riparian Policy, Caltrans Workplans) and/or commenting on related policy and/or technical documents.

SUBTASK SMC617.02: PARTICIPATE IN THE SF BAY REGIONAL MONITORING PROGRAM

Provision C.8.c requires that Permittees “participate in implementing an Estuary receiving water monitoring program, at a minimum equivalent to the San Francisco Estuary Regional Monitoring Program by contributing their fair-share financially on an annual basis.” The budget for this subtask does not include financial contributions to the RMP but does include participation by EOA on behalf of C/CAG and its member agencies in various RMP Workgroups and Strategy Teams to provide input and leadership to the RMP with the goal of identifying opportunities to direct RMP funds and monitoring activities towards meeting both short- and long-term MRP 3.0 requirements.

In recent years this subtask has included assisting with the selection, mapping, and logistical facilitation of wet weather monitoring stations where pollutants of concern (e.g., PCBs, mercury, emerging contaminants) data are collected by the RMP. The data are being used to identify watersheds where PCBs and mercury control actions are likely to have the highest load reduction benefit, and to inform regional pollutant loading and transport models (e.g., Watershed Dynamic Model).

SUBTASK SMC617.03: LOW IMPACT DEVELOPMENT (LID) MONITORING

The EOA project team will perform all aspects of LID Monitoring in accordance with MRP Provision C.8.d. The primary objectives of LID Monitoring are to measure the effectiveness of LID controls on pollutant removal and hydromodification, as well as to understand the minimum levels of Operation and Maintenance (O&M) necessary to maintain performance. The EOA project team has experience designing and implementing the types of monitoring approaches required for this new monitoring requirement.

In FY 2022/23, EOA developed a LID Monitoring Plan for SMCWPPP that meets MRP 3.0 requirements, including LID TAG recommendations. The LID Monitoring Plan was submitted to the Water Board on May 1, 2023, and conditionally approved by the Executive Officer (EO) on August 23, 2023. Monitoring is conducted on a water year basis (October 1 through September 30 of the named water year) and began in WY 2024. LID Monitoring Status Reports must be submitted annually with the Urban Creeks Monitoring Report (UCMR) on March 31st. LID reporting deliverables are included in Subtask SMC617.07.

LID monitoring methods, the minimum number of water quality sample events, and analytical parameters are listed in MRP 3.0 and were clarified through LID TAG discussions and the EO conditional approval process. Flow-weighted (or time-weighted) composite samples of the LID influent and effluent must be collected using automated samplers, and continuous flow must be recorded throughout the wet season. All samples must be analyzed for total mercury, total PCBs, total suspended solids (TSS), total petroleum hydrocarbons (TPH), total and dissolved copper, total and dissolved zinc, total hardness, pH, and per and poly-fluoroalkyl substances (PFAS). Continuous soil moisture and local rainfall measurements will be collected to help develop a water balance for monitored LID facilities. In addition, in WY 2025, infiltration tests will be conducted to inform the water balance. To assess O&M, observations of LID facility integrity and function will be recorded. In San Mateo County, a total of 25 water quality sample events are required during the permit term with an annual minimum of three events. In order to meet these ambitious goals, an average of six sample events must be achieved each year. Two LID facilities in the City of Brisbane were instrumented in FY 2023/24 and will each be monitored an average of three events each year to meet the goal. EOA recommends that SMCWPPP is prepared to monitor each facility during four events each year (if rainfall conditions allow) to “bank” successful sampling events in case a future year does not produce three sampleable storm events.

Because the LID Monitoring Plan and BAMSC LID QAPP must still be updated according to the conditional approval letter and subsequently re-approved by the EO, there remains some uncertainty in LID Monitoring approaches and costs. Cost estimates associated with implementation tasks (see Table 7.3) are based on reasonable assumptions about monitoring approaches.

In accordance with Provision C.8.b, all LID monitoring data will be SWAMP comparable and data quality will be consistent with the SWAMP QAPrP and the BAMSC LID QAPP. Data collection and analytical methods will follow the SWAMP and BAMSC SOPs. EOA, on behalf of C/CAG and its member agencies, will coordinate with the BAMSC RMC partners for collection and analysis of field equipment rinsate blanks and field duplicates to capture cost savings on these quality assurance and quality control (QA/QC) samples. Validation (i.e., QA/QC review) of LID Monitoring data will be conducted according to the BAMSC Regional LID QAPP which specifies quantitative and qualitative data quality objectives (DQOs) for accuracy, precision, and completeness. Data not meeting the defined DQOs will be corrected if possible and flagged as necessary. The data validation process takes several months to complete and includes entry of field data, processing of continuous flow/rainfall/soil moisture data, detailed review of laboratory reports, and use of online SWAMP and California Environmental Data Exchange Network (CEDEN) data checkers. The resulting validated spreadsheets tabulating all LID Monitoring data will be submitted annually with the UCMRs.

SUBTASK SMC617.04: TRASH MONITORING

The EOA project team will perform all aspects of Trash Monitoring in accordance with MRP Provision C.8.e. The primary objectives of Trash Monitoring are 1) to verify whether trash control actions have effectively prevented trash from discharging to receiving waters and 2) to evaluate whether discharges of trash where full trash capture equivalency has been achieved are causing or contributing to adverse trash impacts in receiving waters. EOA is the recognized leader in trash assessment in California and will assist C/CAG and its member agencies in the development and implementation of a trash monitoring program that complies with this new MRP requirement.

In FYs 2022/23 and 2023/24, EOA worked with BAMSC to develop a Regional Trash Outfall Monitoring Plan and QAPP that meets the permit requirements, including Trash Monitoring TAG recommendations. The Trash Outfall Monitoring Plan was submitted to the Water Board on July 31, 2023, and conditionally approved by the Executive Officer (EO) on August 31, 2023. An updated Outfall Monitoring Plan addressing the conditional approval must be submitted by July 31, 2024. Monitoring is conducted on a water year basis and began in WY 2024. Trash Monitoring Progress Reports must be submitted annually with the Urban Creeks Monitoring Report (UCMR) on March 31st. Trash reporting deliverables are included in Subtask SMC617.07.

Trash Monitoring methods, site selection criteria, the minimum number of sample sites and events, and types of wet weather events to be targeted are specified in MRP 3.0. Two types of sampling sites are required: 1) MS4 outfalls and 2) receiving waters. Catchments draining to both types of sites must be controlled to the “low” trash generation level.

- Outfalls must be monitored using netting devices attached to the end of the outfall pipe, and receiving waters must be monitored using trawls, nets, or equivalent devices that capture as much of the width and depth of the cross section as is feasible and safe. In both cases, trash must be collected during storm events followed by characterization of the material collected. In San Mateo County, a total of two outfalls must be monitored during a minimum of three wet weather events per year, beginning in WY 2024. These outfalls are located in the Cities of San Carlos and Half Moon Bay and were instrumented with trash net devices in FY 2022/23 and successfully monitored in FY 2023/24 with the help of subconsultant Revel Environmental Manufacturing, Inc. (REM) to retrieve nets full of trash.
- One San Mateo County receiving water station must be monitored during a minimum of three wet weather events per year, beginning in WY 2025.

Targeted wet weather events for both types of sites must be large enough to trigger trash discharge through the MS4 (e.g., 0.25 inches over 24 hours). Ideally, each year, the first sufficient storm event should be targeted, along with at least one storm event that is forecast to be greater than the one-year, one-hour event. In addition, at all trash monitoring stations, flow must be measured continuously throughout the wet season to support calculation of trash loading estimates.

MPR 3.0 describes the receiving water monitoring element as a “pilot program.” In FY 2022/23 the BAMSC regional partners (with C/CAG as the applicant) received funding for trash receiving water monitoring through a USEPA WQIF grant. The Watching Our Watersheds project began in December 2023. In FY 2023/24 EOA

assisted SMCWPPP in participating in the WOW project by helping the WOW project team identify receiving water monitoring sites, and by reviewing project deliverables, such as the methods review report, and the Regional Trash Receiving Water Monitoring Plan and QAPP, which must be submitted by July 31, 2024. In FY 2024/25, EOA will continue to provide WOW document review and will work with municipalities to facilitate the encroachment permitting process, if needed. All trash receiving water monitoring and trash characterization for outfall and receiving water samples will be implemented through the WOW project, which also includes several outreach and information dissemination tasks.

In accordance with Provision C.8.b, all trash monitoring data must be SWAMP comparable and data quality must be consistent with the SWAMP QAPrP and the BAMSC QAPP. Validation of trash monitoring data will be conducted according to the Regional Trash QAPPs. Data not meeting the defined DQOs will be corrected if possible and flagged as necessary. The resulting validated spreadsheets tabulating all trash monitoring data will be submitted annually with the UCMRs.

The trash monitoring methods required by MRP 3.0 have never been implemented in the manner described in the Bay Area or elsewhere. Furthermore, because the Trash Outfall Monitoring Plan and QAPP must still be updated according to the conditional approval letter and subsequently re-approved by the EO, there remains some uncertainty in Trash Monitoring approaches and costs. Cost estimates associated with implementation tasks (see Table 7.3) are based on reasonable assumptions about monitoring approaches.

SUBTASK SMC617.05: POLLUTANTS OF CONCERN MONITORING

Provision C.8.f requires Pollutants of Concern (POC) Monitoring for PCBs, mercury, copper, and Contaminants of Emerging Concern (CECs). The MRP defines yearly (i.e., water year) and total (i.e., permit term) minimum numbers of samples for each POC. Six priority POC management information needs are identified including Source Identification, Contributions to Bay Impairment, Management Action Effectiveness, Loads and Status, Trends, and Compliance with Receiving Water Limitations (RWL). The MRP specifies the minimum number of samples for each POC that must address each information need. Although an overall POC Monitoring Plan is not required, a RWL Assessment Report describing planned monitoring for this information need (e.g., analytes, sampling locations) is required under Provision C.8.h.iv, was submitted to the Water Board by March 31, 2023, and conditionally approved on June 12, 2023. POC reporting deliverables are included in Subtask SMC617.07.

EOA will perform all aspects of the required POC Monitoring in FY 2024/25, which will initially focus on identification of source areas of PCBs and mercury to the MS4 and San Francisco Bay, an immediate information need that meets requirements of Provision C.8.f and C.11/12. Results of the monitoring will be used to identify watersheds and management areas where PCBs and mercury control measures will be implemented during the permit term. On average, annual POC Monitoring for PCBs and mercury will need to include seven wet and seven dry weather samples to meet the MRP requirements. POC Monitoring during the permit term will also need to address minimum sampling requirements for copper (i.e., five total samples), which will be collected opportunistically. RWL Assessment monitoring includes four wet season and one dry season sample for copper, zinc, lead, mercury, hardness, nitrate, nitrite, Total Kjeldahl Nitrogen, total phosphorus, ammonia, PCBs, and fecal indicator bacteria, with PAHs added through the conditional approval process. Requirements for CECs will be met through additional financial contributions to the RMP, which are not part of this scope of work.

The cost estimate associated with FY 2024/25 POC Monitoring is based on appropriate assumptions.

In accordance with Provision C.8.b, all POC Monitoring data will be SWAMP comparable and data quality will be consistent with the SWAMP QAPrP and other relevant QAPPs (e.g., BASMAA QAPP, CW4CB QAPP, LID QAPP). Data collection and analytical methods will follow the SWAMP, BASMAA, and BAMSC SOPs. Validation of POC Monitoring data will be conducted according to relevant QAPPs which specify quantitative and qualitative DQOs for accuracy, precision, and completeness. Data not meeting the defined DQOs will be corrected if possible and flagged as necessary. The data validation process takes several months to complete and typically occurs between August and December as field data sheets are entered, laboratory reports are received, and the online SWAMP and CEDEN data checkers are accessed. The resulting validated spreadsheets tabulating all POC Monitoring data will be submitted annually with the UCMRs.

SUBTASK SMC617.06: PESTICIDES AND TOXICITY MONITORING

EOA will perform all aspects of the required Pesticides and Toxicity (P&T) Monitoring specified in Provision C.8.g, which requires that Permittees conduct dry weather and wet weather monitoring of pesticides and toxicity in urban creeks. San Mateo County Permittees are required to sample one dry weather station per year for water column toxicity (five test organisms), sediment toxicity (two test organisms), and sediment chemistry (pesticides, PAHs, metals, total organic carbon, grain size). MRP 3.0 defines wet weather sampling requirements on a regional basis. The RMC must collect a total of 10 wet weather samples over the permit term, with a minimum of six samples collected by the end of the third water year (WY 2025). Wet weather samples must be analyzed for water toxicity (five test organisms) and water chemistry (pesticides). Wet weather monitoring requirements were satisfied in WY 2023. EOA, on behalf of C/CAG and its member agencies, will coordinate dry weather sampling with its RMC partners to capture cost savings on QA/QC samples (e.g., field duplicates, matrix spikes).

Dry weather P&T Monitoring is typically conducted in July. EOA will subcontract with KEI to conduct the sampling and KEI will contract with the analytical laboratories (Pacific EcoRisk, Caltest)

In accordance with Provision C.8.b, all P&T Monitoring data will be SWAMP comparable and data quality will be consistent with the SWAMP QAPrP and the BASMAA QAPP. Data collection and analytical methods will follow the SWAMP and BASMAA SOPs. Validation of P&T Monitoring data will be conducted according to the BASMAA QAPP which specifies quantitative and qualitative DQOs for accuracy, precision, and completeness. Data not meeting the defined DQOs will be corrected if possible and flagged as necessary. The data validation process takes several months to complete and typically occurs between August and December as field data sheets are entered, laboratory reports are received, and the online SWAMP and CEDEN data checkers are accessed. The resulting validated spreadsheets tabulating all P&T Monitoring data will be submitted annually with the UCMRs.

SUBTASK SMC617.07: PROVISION C.8 REPORTING

Provision C.8.h requires annual and comprehensive reporting of data collected pursuant to Provision C.8, in SWAMP-comparable format as appropriate for submittal to the Water Board, and submittal of applicable data to CEDEN. During the contract period, EOA will develop all required reporting materials for review and comment by C/CAG member agencies prior to Water Board submittal. Each monitoring deliverable is described below.

Electronic Monitoring Data Reports will be submitted annually (March 31) to the Regional Data Center (i.e., Moss Landing) for upload to CEDEN. The Electronic Monitoring Data reports will include all data for the preceding water year that CEDEN can accept, which is limited to receiving water data. Examples of data exempt from this requirement include upland urban sediments, MS4 outfall data, and data collected at LID facilities.

Urban Creeks Monitoring Reports (UCMRs) will be submitted annually (March 31) to the Water Board. Each annual UCMR will summarize results and provide interpretations of data collected pursuant to LID Monitoring (C.8.d), Trash Monitoring (C.8.e), POC Monitoring (C.8.f), and P&T Monitoring (C.8.g) during the foregoing water year. The bullets below describe the required UCMR reporting element for each of these provisions.

- For each LID facility (or component) targeted, the annual *LID Monitoring Status Report* must summarize methods; study designs; sample locations, dates, and results; data trends; land use and other stormwater management controls in contributing watershed; lessons learned; a statement of data quality; plans for the upcoming water year; and an evaluation of the effectiveness of control measures.
- The *Annual Trash Monitoring Progress Report* must include a narrative description of the number of sites monitored and monitoring events completed, information about the intensity and duration of storm events sampled, where on the storm hydrograph samples were collected, justification used to determine the storm event was of appropriate size, data results, statistical analyses, data QA/QC

procedures, description of land use and illegal trash sources within sampling station catchments, and plans for subsequent years. MRP 3.0 requires that the *Annual Trash Monitoring Progress Report* is a single collective regionwide report. Therefore, EOA will work with the BAMSC RMC to compile SMCWPPP information in a regional format. Reporting of trash receiving water monitoring accomplishments will be conducted separately through the WOW project, with review by EOA on behalf of C/CAG and its member agencies.

- The annual *Pesticides and Toxicity Status Report* must list monitoring site information, results for each sampled parameter, and a statement of data quality. It must also describe monitoring data relative to prior conditions and identify potential sources of impairments and follow-up actions.
- *Pollutants of Concern Monitoring Reports* will describe the allocation of sampling efforts for the forthcoming water year, what was accomplished during the preceding water year, and accounting of progress towards minimum sampling requirements. At a minimum, the reports shall include monitoring locations, purpose of sampling (information need addressed), and data results. Data interpretations will seek to address the management questions and will be used to refine POC Monitoring approaches in subsequent years. EOA will add the data to the existing GIS database which already contains PCBs collected over the past twenty years and is continually updated as new information is obtained from a variety of sources. GIS maps will be developed, and data will be analyzed using GIS tools as well as spreadsheet and statistical software.

Table 7.1 Descriptions, deliverables, and cost estimates for Water Quality Monitoring subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC617.01: REGIONAL COORDINATION			
FY 2024/25	<p>EOA will participate in six bimonthly meetings of BAMSC MPC Committee and six bimonthly meetings of BAMSC RMC Trash and LID Workgroups on behalf of C/CAG and its member agencies. EOA will also work with regional partners to review pertinent policy documents and participate in related meetings.</p> <p>EOA will participate in one Trash TAG and one LID Effectiveness TAG meeting.</p> <p>EOA will contribute (via SMCWPPP in-kind consultant services), on behalf of C/CAG and its member agencies, towards necessary updates to the BASMAA/BAMSC QAPPs and SOPs, USEPA WQIF grant materials (e.g., budget tracking), and other regional documents needed to comply with MRP 3.0.</p>	<ul style="list-style-type: none"> • Participation in meetings • Updated QAPP and SOPs, if needed • Telephone and email communications and comments on and/or contributions to pertinent regional documents. 	\$36068
SUBTASK SMC617.02: PARTICIPATE IN THE REGIONAL MONITORING PROGRAM			
FY 2024/25	<p>On an annual basis, EOA will participate in one two-day meeting of the RMP's Sources Pathways, and Loadings Workgroup (SPLWG), four quarterly meetings of the Small Tributaries Loading Strategy (STLS) Team, and two meetings of the PCBs Strategy Team on behalf of C/CAG and its member agencies. It is assumed that all of these meetings, with the exception of the annual SPLWG meeting, will be attended via Zoom (or equivalent). EOA will also assist with selection of STLS and emerging contaminant monitoring stations and review and comment on RMP-related documents and work products (e.g., modeling reports, monitoring plans, special study proposals, data reports).</p>	<ul style="list-style-type: none"> • Participation in meetings. • Telephone and email communications. • Maps and tables describing recommended sampling stations. • Comments on pertinent RMP documents. 	\$25,822
SUBTASK SMC617.03: LOW IMPACT DEVELOPMENT MONITORING			
FY 2024/25	<p>Monitoring equipment that was procured in FY 2022/23, utilized in FY 2023/24, and removed for dry season storage, will be re-installed in September 2024 in preparation for LID monitoring to begin by October 1, 2024. A minimum of three (and up to four) storm events will be targeted for monitoring at two Brisbane facilities for a total of six (or eight) paired samples in WY 2025. Samples will be submitted to contract laboratories for analysis in FY 2024/25; however, it is likely that some analytical data will not be available for the validation process until FY 2025/26. Infiltration tests will be conducted in WY 2025. Monitoring equipment will be removed at the end of the wet season for storage. Validation of WY 2024 data will be completed in FY 2024/25. Reports associated with LID monitoring are described in Subtask SMC617.7.</p>	<ul style="list-style-type: none"> • Re-install monitoring equipment. • Conduct at least three (and up to four) wet weather LID Monitoring events. • WY 2024 LID Monitoring data that has undergone QA/QC review for all required parameters. 	\$342,905

Table 7.1 Descriptions, deliverables, and cost estimates for Water Quality Monitoring subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC617.04: TRASH MONITORING			
FY 2024/25	<p>An updated Regional Trash Outfall Monitoring Plan will be submitted to the EO for approval on July 31, 2024.</p> <p>EOA will continue to maintain necessary regulatory permits for trash monitoring (e.g., Caltrans encroachment permits, CDFW Streambed Alteration Agreement).</p> <p>EOA will maintain the necessary trash outfall monitoring equipment (e.g., net devices, flow gauges). WY 2025 monitoring will begin October 1, 2024 and will target a minimum of three storm events. Flow will be measured throughout the wet season and models will be applied to complete the record. Collected trash will be retrieved, stored (e.g., at regional site). Later characterization of trash will be conducted as part of the WQIF grant. Reports associated with Trash Monitoring are described in Subtask SMC617.07.</p> <p>EOA will provide support to the WOW Trash Receiving Water Monitoring Program as part of the SMCWPPP grant match.</p>	<ul style="list-style-type: none"> • Updated Trash Monitoring Plan for EO approval (July 31, 2024). • Regulatory permits. • Purchase and install monitoring equipment. • Conduct at least three wet weather monitoring events at two outfall sites. • WY 2024 Trash Monitoring data that has undergone QA/QC review for all required parameters. 	\$142,333
SUBTASK SMC617.05: POLLUTANTS OF CONCERN MONITORING			
FY 2024/25	<p>In FY 2024/25, EOA will conduct annual POC Monitoring in compliance with minimum frequencies described in MRP 3.0 with the goal of achieving the minimum number of samples for each monitoring type by the end of the permit term. Details of where (MS4 vs. receiving water), when (wet vs. dry weather), what (water vs. sediment), how (grab sample vs. composite), and why (which of the six information needs is addressed) will be developed at the beginning of the FY. Monitoring will support overall needs of C/CAG and its member agencies to meet Provision C.8.f monitoring requirements and address C.11/12 investigation requirements.</p> <p>Reports associated with POC Monitoring are described in Subtask SMC617.07.</p>	<ul style="list-style-type: none"> • Collect and analyze up to seven wet weather and seven dry weather (or equivalent) PCBs and mercury samples. • Continue implementation of the RWL Assessment Monitoring Plan in WY 2025. • WY 2024 POC Monitoring data that has undergone QA/QC review for all required parameters. 	\$200,964

Table 7.1 Descriptions, deliverables, and cost estimates for Water Quality Monitoring subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC617.06: PESTICIDES AND TOXICITY MONITORING			
FY 2024/25	<p>EOA will communicate with contractors and regional partners in preparation for P&T sample collection.</p> <p>In July of 2024, EOA will collect one dry weather P&T sample and will conduct QA/QC review of the analytical data.</p> <p>Reports associated with P&T Monitoring are described in Subtask SMC617.07.</p>	<ul style="list-style-type: none"> • Collect and analyze one dry weather P&T sample in July 2024. • WY 2024 P&T Monitoring data that has undergone QA/QC review for all required parameters. 	\$42,211
SUBTASK SMC617.07: PROVISION C.8 REPORTING			
FY 2024/25	<p>In FY 2024/25, EOA will develop the Electronic Monitoring Data Report and UCMR describing WY 2024 monitoring. The UCMR will include the following elements:</p> <ul style="list-style-type: none"> • LID Monitoring Status Report • Annual Trash Monitoring Progress Report. EOA will work with the BAMSC RMC on this regional report. • P&T Status Report • POC Monitoring Report 	<ul style="list-style-type: none"> • WY 2024 Electronic Monitoring Data Report (Mar. 31, 2025) • WY 2024 UCMR (Mar. 31, 2025) 	\$94,672

Table 7.2. Schedule for completing Water Quality Monitoring subtasks and deliverables (meetings symbolized as white dots).

No.	Task	FY 2024/25											
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
SMC617.01	Regional Level Coordination												
7.1.a	BAMSC Monitoring and Pollutants of Concern Committee meetings (1st Wed	•	•	•	•	•	•	•	•	•	•	•	•
7.1.b	BAMSC Trash and LID Monitoring Workgroups	•	•	•	•	•	•	•	•	•	•	•	•
7.1.c	Trash Technical Adviory Group (TAG) meetings								•			•	
7.1.d	Low Impact Development (LID) TAG meetings										•		
7.1.e	Update BASMC QAPP and SOPs											•	
SMC617.02	Regional Monitoring Program Participation												
7.2.a	RMP Sources, Pathways and Loadings Workgroup annual meetings (TBD)												•
7.2.b	RMP Small Tributaries Loading Strategy Team quarterly meetings (TBD)			•			•			•			•
7.2.c	RMP PCBs Sreategy Team biannual meetings (TBD)				•				•				•
SMC617.03	Low Impact Development Monitoring												
7.3.a	Re-install Monitoring Equipment		•										
7.3.b	LID Monitoring Plan Implementation				•	•	•	•	•	•	•	•	•
7.3.c	LID Data Validation									•	•	•	•
SMC617.04	Trash Monitoring												
7.4.a	Revise Regional Trash Outfall Monitoring Plan	•											
7.4.b	Trash Monitoring Plan Implementation				•	•	•	•	•	•	•	•	•
7.4.c	Trash Data Validation									•	•	•	•
SMC617.05	Pollutants of Concern (POC) Monitoring												
7.5.a	POC Field Monitoring												
7.5.b	POC Data Management & Validation									•	•	•	•
SMC617.06	Pesticides and Toxicity (P&T) Monitoring												
7.6.a	Dry Weather Sampling (WY 2024)	•											
7.6.b	P&T Data Validation				•	•	•	•	•	•	•	•	•
7.6.c	Planning for WY 2024 P&T Monitoring												•
SMC617.07	Reporting												
7.7.a	Electronic Monitoring Data Report									•	•	•	•
7.7.b	Executive Summary for Urban Creeks Monitoring Report									•	•	•	•
7.7.c	LID Monitoring Status Report									•	•	•	•
7.7.d	Annual Trash Monitoring Progress Report									•	•	•	•
7.7.e	P&T Status Report									•	•	•	•
7.7.f	POC Monitoring Report	•	•	•	•	•	•	•	•	•	•	•	•

Table 7.3. Estimated costs for completion of Water Quality Monitoring subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Subcontractors (including Laboratories) and EOA Markup	Budget
	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical			
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77			
FY 2024/25																		
SMC617.01 Regional Level Coordination	0	0	96	0	8	0	0	0	56	0	0	0	0	20	0	\$0	\$0	\$36,068
SMC617.02 Regional Monitoring Program Participation	--	--	94	--	--	--	--	--	8	--	--	--	--	--	--	\$200	\$0	\$23,822
SMC617.03 Low Impact Development LID Monitoring	0	0	64	0	32	0	0	0	168	0	40	0	0	0	0	\$700	\$285,141	\$342,905
SMC617.04 Trash Monitoring	8	--	100	--	--	180	--	--	40	12	82	76	--	--	--	\$4,600	\$40,995	\$142,333
SMC617.05 Pollutants of Concern Monitoring	0	0	60	0	60	8	0	16	120	0	145	25	0	0	0	\$1,700	\$120,283	\$200,964
SMC617.06 Pesticides and Toxicity Monitoring	--	--	12	--	--	4	--	--	12	--	42	--	--	--	--	\$125	\$29,748	\$42,211
SMC617.07 Reporting WY 2024 UCMR	2	0	120	0	64	44	0	0	140	0	100	0	0	0	0	\$0	\$2,000	\$94,672
	10	0	546	0	164	236	0	16	544	12	409	101	0	20	0	\$7,325	\$478,167	\$882,975

TASK SMC618 – TRASH LOAD REDUCTION

EOA will assist C/CAG on all trash load reduction subtasks described below. Our approach to conducting these tasks in a cost-efficient manner is provided in this section, along with our project team member roles and expertise, scope-of-work (including subtask deliverables and budgets), and cost estimate.

UNDERSTANDING AND APPROACH

The development and implementation of stormwater trash control programs is one of the highest priority components in the reissued MRP (i.e., MRP 3.0). Trash control programs are designed to significantly reduce the levels of trash and litter discharged from municipal separate storm sewer systems (MS4s) and protect local creeks and the San Francisco Bay. Under MRP 3.0, SMCWPPP member agencies are required to achieve challenging trash reduction benchmarks (i.e., 90% and 100%) over aggressive timeframes (i.e., 2023 and 2025).

Through our continued support during MRP 2.0, the EOA project team formed a clear understanding of C/CAG member agency needs and priorities related to trash load reduction tasks. At a core level, member agencies are primarily focused on addressing and achieving trash load reduction benchmarks through the cost-effective implementation of control measures, resulting in improved water quality and the quality of life in San Mateo County. To achieve this objective, EOA will continue assisting C/CAG members agencies with ongoing tasks conducted in previous years under the oversight of the Trash Subcommittee, and to conduct new tasks that will assist agencies with MRP 3.0 compliance. Tasks that will need to be completed during MRP 3.0 include providing assistance on updating and implementing *Long-term Trash Reduction Plans*, including trash generation maps; identifying optimal locations for trash full capture devices; identifying, developing and implementing trash assessment strategies, including the mapping of full capture treatment areas and conducting on-land visual trash assessments for C/CAG member agencies; and calculating and reporting trash load reductions to the Water Board in compliance with MRP 3.0. Additionally, the EOA project team will expand the scope of the Trash Subcommittee to embrace topics like illegal dumping and inadequate waste management practices that were previously covered by the SMCWPPP Litter Workgroup.

The EOA project team's approach to conducting these tasks is to coordinate directly with C/CAG member agencies, adjust our efforts accordingly based on their needs, and provide the technical and regulatory services necessary to allow member agencies to achieve compliance with MRP 3.0 requirements, including enforceable trash load reduction benchmarks.

PROJECT TEAM ROLES AND EXPERTISE

During MRP 1.0, EOA led the development of baseline trash generation rates for all MRP stormwater Permittees, which led to the development of SMCWPPP member agency specific trash generation maps. Additionally, EOA developed the framework for the trash reduction accounting system that is cited in MRP 2.0 and 3.0 and assisted all C/CAG member agencies in developing and implementing trash management and assessment strategies, including those that use EOA's *On-land Trash Visual Assessment Protocol* as a method to demonstrate trash load reductions. We have also assisted individual municipalities throughout the Bay Area by conducting full capture system cost-benefit analyses and identifying feasible locations for these devices with the greatest trash load reduction benefit and identifying other types of controls that could achieve the MRP trash reduction goal.

Chris Sommers, the current trash load reduction coordinator for SMCWPPP, will continue as the task leader for the trash load reduction task. Chris has over 20 years of consulting and project management experience, with a focus on stormwater management, NPDES permitting, program effectiveness evaluation, water quality monitoring, TMDL implementation, and trash/litter management. Chris is the leader in the State of California on stormwater trash and litter management and assessment and is supported by a number of highly experienced senior and associate level staff at EOA (e.g., John Fusco), all with invaluable knowledge of SMCWPPP member agency needs and experience in designing and implementing trash management and assessment strategies in San Mateo County.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

EOA will conduct the following subtasks to support member agencies during FY 2024/25:

1. Long-Term Trash Load Reduction Plan Support
2. Trash Load Reduction Assessment Program
3. Trash Offsets – Creek and Shoreline Cleanups
4. Full Trash Capture Device Operation and Maintenance Program
5. Assistance with Annual Reporting and Load Reduction Calculations

Subtask descriptions, deliverables, and budgets for Trash Load Reduction are described below and in Table 8.1. The subtask schedules are included in Table 8.2. Table 8.3 provides a cost estimate for subtasks included in the scope-of-work.

SUBTASK SMC618.01: LONG-TERM TRASH LOAD REDUCTION PLAN SUPPORT

Since 2010, EOA has successfully provided cost-effective technical guidance on long-term trash load reduction planning, including the identification of high trash generation areas and trash management strategies. The project team has provided mapping services to C/CAG member agencies to illustrate and calculate trash baseline generation, the extent of trash management areas, creek and shoreline hot spots, and full capture device treatment areas. EOA has efficiently constructed and managed the SMCWPPP Trash Geographical Information System (GIS) on behalf of all member agencies.

In FY 2024/25, EOA will continue providing these services by conducting a series of tasks designed to assist member agencies with the achievement of trash reduction benchmarks (i.e., 90% and 100%) required by MRP 3.0. Importantly, the 100% benchmark must be achieved without the use of source control credits or creek/shoreline clean up offsets. The following subtasks are being completed by EOA during the first three-year period of MRP 3.0 in support of C/CAG member agencies efforts to achieve the 100% trash load reduction benchmark:

- Baseline Map Reevaluation - Evaluate and revise member agency baseline trash generation maps to exclude areas that are not draining to MS4s and the improve the precision of delineated trash generating areas and existing traditional full capture systems;
- GI as Full Trash Capture Systems - Evaluate, identify, and account for applicable Green Infrastructure (GI) that achieve the full capture system design criteria for Multi-beneficial Systems, as outlined by the State Water Board;
- Control Program for Private Land Drainage Areas - Identify areas draining to storm drain inlets on private property and develop a *Model Trash Inspection Program/Plan* that identifies an approach for addressing trash on these private land drainage areas; and
- Trash Source and Control Measure Evaluation – Using existing OVTA data, identify trash sources to trash generating areas that are not achieving low trash generation and are not treated by full capture systems, and conduct a trash control measures evaluation for these areas to inform member agency trash control measure implementation.

These tasks will provide the information needed by member agencies to develop and implement their updated Long-term Trash Reductions Plans as required by MRP 3.0 and identify additional actions that will need to be implemented to achieve the 100% benchmark, without the use of credits for source controls and offsets for creek/shoreline cleanups.

Importantly, this task assumes that all reporting by member agencies on the achievement of the 100% benchmark (or lack thereof) will occur in FY 2025/26 (i.e., September 2025) and that assistance provided to member agencies by EOA would be included in tasks budgeted for FY 2025/26. As such, the FY 2024/25 task described in this section does not include assistance to member agencies for reporting on achievement of the 100% trash load reduction benchmark after June 30, 2025.

Additional details on these subtasks and associated deliverables are described in Table 8.1.

SUBTASK SMC618.02: TRASH LOAD REDUCTION ASSESSMENT PROGRAM

In FY 2024/25, EOA will assist C/CAG member agencies by continuing to implement and manage the SMCWPPP Trash Load Reduction Assessment Program initially developed by EOA in FY 2013/14. The Assessment Program is consistent with MRP 3.0 requirements and includes the use of the *On-land Visual Trash Assessment (OVTA) Protocol* developed by EOA and designed to assess the levels of trash that are generated onto streets that may enter the stormwater conveyance system. The OVTA method provides a method by which C/CAG member agencies can demonstrate progress towards trash load reduction goals included in MRP 3.0. Member agencies embraced the protocol in its 2014 *Pilot Trash Load Reduction Assessment Strategy* submitted to the Water Board with member agency Long-term Trash Load Reduction Plans.

Through implementation of this subtask, EOA will continue coordinating the countywide trash load reduction assessment program, which entails annually selecting OVTA sites, conducting trash assessments at the frequencies described in MRP 3.0 (or equivalent), implementing appropriate quality assurance and control procedures, and managing assessment data via EOA's OVTA on-line database.

Additionally, EOA will conduct two trainings for member agency staff through the implementation of this subtask. The trainings will focus on conducting OVTAs as part of Private Land Drainage Area (PLDA) Trash Inspection Programs (TIPs) being implemented by member agencies.

Subtask descriptions and associated deliverables are further described in Table 8.1 below.

SUBTASK SMC618.03: TRASH OFFSETS – CREEK AND SHORELINE CLEANUPS

MRP 2.0 required member agencies 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 were required to record the volumes of trash removed from these hot spots. These requirements have changed with the adoption of MRP 3.0. Trash hot spot cleanups are no longer required, but member agencies have an option to offset trash reduction requirements with trash removed via hot spot cleanups.

Through implementation of this subtask, In FY 2024/25 EOA will continue to manage the data collected by member agencies during optional hot spot cleanups and develop standardized reporting formats populated with historical and current hot spot data for each applicable member agency to satisfy annual reporting requirements. Subtask descriptions and associated deliverables are further described in Table 8.1.

SUBTASK SMC618.04: FULL TRASH CAPTURE DEVICE OPERATION AND MAINTENANCE PROGRAM

In FY 2014/15, EOA developed a Model Full Capture Device Operations and Maintenance Verification Program to assist C/CAG member agencies in implementing permit-compliant operations and maintenance (O&M) programs for trash full capture devices. The Model O&M program also included Standard Operation Procedures (SOPs) for maintaining both large and small full capture devices.

Through this subtask, in FY 2024/25 EOA will support member agencies in the development of agency specific O&M verification programs. Additionally, EOA will conduct one training workshop for member agency staff to coordinate MRP 3.0-required inspection and maintenance frequencies and provide a forum for discussing issues and perspectives of member agency staff. Subtask descriptions and associated deliverables are further described in Table 8.1.

SUBTASK SMC618.05: ASSIST WITH ANNUAL REPORTING AND LOAD REDUCTION CALCULATIONS

C/CAG member agencies are required to annually report on progress towards trash load reduction benchmarks and compare their load reduction progress to date against these benchmarks. If a member agency is not able to demonstrate the achievement of these benchmarks, it could result in enforcement

by the Water Board or litigation by third parties. During MRP 1.0 and 2.0, EOA assisted all C/CAG member agencies in successfully demonstrating trash load reductions resulting in determinations of compliance for nearly all San Mateo cities and the Unincorporated County. The accounting system previously utilized has been revised for MRP 3.0, so EOA has been providing San Mateo County Permittees with further guidance and assistance on load reduction accounting this permit term.

In FY 2024/25, EOA will continue to provide technical support to all C/CAG member agencies on annual reporting. EOA will assist with developing each member agency's trash load reduction section of their Annual Reports by providing guidance to municipalities 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 each member agency. For those municipalities that provide draft Annual Report sections before a certain date (to be determined), EOA will review the forms and provide comments, to the extent feasible within the available budget. Subtask descriptions and associated deliverables by fiscal year are further described in Table 8.1.

Table 8.1 Descriptions, deliverables, and cost estimates for Trash Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC618.01: LONG-TERM TRASH LOAD REDUCTION PLAN SUPPORT			
FY 2024/25	EOA will provide additional guidance on long-term plan implementation and perspectives on optimization of control actions for trash management via conference calls and meetings with C/CAG member agencies. Additionally, EOA will update each member agency's trash generation map to include the following information as required by MRP 3.0: trash management areas, private land drainage areas that will be retrofitted with full trash capture devices or equivalent, locations and associated drainage areas of full trash capture systems, and other trash control actions, and highlights of any revisions or changes from the previous map(s).	<ul style="list-style-type: none"> • 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. • Draft updated/revised trash generation and trash control measure maps and GIS data layers for FY 23/24 annual report submittal. 	\$96,780
SUBTASK SMC618.02: TRASH LOAD REDUCTION ASSESSMENT PROGRAM			
FY 2024/25	Coordinate the SMCWPPP trash load reduction assessment program including the selection of on-land assessment sites and implementation of assessments during dry and wet seasons (to the extent possible) at frequencies outlined in the MRP 3.0 Factsheet. Assessment sites will be located in high priority trash management areas identified by member agencies. EOA will annually conduct on-land visual assessments and manage the associated data in the on-land visual assessment database developed by EOA. EOA will use trained interns/associate staff to conduct these assessments to reduce per-assessment costs. Additionally, EOA will coordinate with member agencies on all assessments and compile assessment data collected by member agencies into the OVTA database system. EOA will also conduct two trainings for member agency staff on the use of OVTA to address trash on Private Land Drainage Areas (PLDAs)	<ul style="list-style-type: none"> • Completion of 700 on-land visual assessments. • Assessment results and populated OVTA Database. • On-going technical support on assessments and associated data. • Two OVTA trainings for member agency staff 	\$168,980
SUBTASK SMC618.03: TRASH OFFSETS – CREEK AND SHORELINE CLEANUPS			
FY 2024/25	Manage the data collected by member agencies during optional hot spot cleanups and develop standardized reporting formats populated with historical and current hot spot data for each applicable member agency to satisfy annual reporting requirements.	<ul style="list-style-type: none"> • Annual reporting and data collection guidance on the standardized reporting of trash reductions associated with creek and/or shoreline cleanups. • Creek and shoreline hot spot database populated with trash data collected by all member agencies. • Annual Report tables populated with hot spot cleanup data for current and previous fiscal years. 	\$16,004
SUBTASK SMC618.04: FULL TRASH CAPTURE DEVICE OPERATION AND MAINTENANCE PROGRAM			
FY 2024/25	Support member agencies in the development and implementation of agency specific O&M verification programs.	<ul style="list-style-type: none"> • Revised Trash Full Capture O&M Verification Program materials, including descriptions of requirements and tracking and reporting tables/tools. 	\$11,092

Table 8.1 Descriptions, deliverables, and cost estimates for Trash Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC618.05: ASSIST WITH ANNUAL REPORTING AND LOAD REDUCTION CALCULATIONS			
FY 2024/25	Provide technical support to all member agencies during development of their FY 2023/24 Annual Reports. EOA will assist with developing each member agency's trash load reduction section of their Annual Reports by providing guidance to municipalities 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 before a certain date (to be determined), EOA will review the forms and provide comments, to the extent feasible within the available budget.	<ul style="list-style-type: none"> • Updated guidance to member agencies for completing Trash Load Reduction sections of their FY 2023/24 Annual Reports. • Draft and final calculations of trash load reductions for each member agency for FY 2023/24 and associated draft Annual Report sections. • Comments on trash control sections of individual municipal FY 2023/24 Annual Reports as applicable and feasible within available budget. 	\$65,960

Table 8.2. Schedule for completion of Trash Load Reduction subtasks and deliverables (meetings symbolized as white dots).

No.	Task	FY 2024/25											
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
SMC618.01	Long-term Trash Load Reduction Plan Support	•											
SMC618.02	Trash Load Reduction Assessment Program	•			•								
SMC618.03	Trash Offsets - Creek and Shoreline Cleanups	•										•	
SMC618.04	Full Trash Capture Device Operation and Maintenance Program	•											
SMC618.05	Assist with Annual Reporting and Load Reduction Calculations		•	•									

Table 8.3. Estimated costs for completion of Trash Load Reduction subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Budget	
	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical			
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77			
FY 2024/25																		
SMC618.01	Long-term Trash Load Reduction Plan Support	70	--	--	--	--	140	--	--	140	--	140	--	--	--	--	\$2,700	\$96,780
SMC618.02	Trash Load Reduction Assessment Program	40	--	--	--	--	--	--	--	260	380	380	--	--	--	--	\$9,000	\$168,980
SMC618.03	Trash Offsets - Creek and Shoreline Cleanups	4	--	--	--	--	32	--	--	32	--	16	--	--	--	--	\$500	\$16,004
SMC618.04	Full Trash Capture Device Operation and Maintenance Program	4	--	--	--	--	32	--	--	--	16	--	--	--	--	--	\$500	\$11,092
SMC618.05	Assist with Annual Reporting and Load Reduction Calculations	40	--	--	--	--	80	--	--	--	80	120	80	--	--	--	\$1,000	\$65,960
		158	0	0	0	0	284	0	0	172	260	616	516	80	0	0	\$13,700	\$358,816

TASK SMC619 – PCBs AND MERCURY LOAD REDUCTION

For PCBs and Mercury Load Reduction, the following sections describe EOA's understanding of the task and approach, the roles and expertise of our project team members, and the scope-of-work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

With the adoption of MRP 3.0, the development and implementation of control programs to achieve mercury and PCBs load reductions has become an increasingly high priority component of municipal stormwater management in the Bay Area. The following sections provide detailed information regarding our team's understanding and approach relative to continue assisting C/CAG and its member agencies in implementing the requirements of the control programs outlined in MRP 3.0 Provisions C.11 and C.12.

We will work with C/CAG's member agencies on the various control programs for mercury and PCBs via the Stormwater Committee and through the Old Industrial PCBs Workgroup, which was formed to address activities related to the program for enhanced control measure implementation in old industrial areas (Subprovisions C.11.c. and C.12.c.). As needed, this workgroup's scope will be expanded to address activities related to other control programs for mercury and PCBs (e.g., source identification, PCBs in electrical utility equipment, PCBs in roadway and bridge infrastructure, and building materials management during demolition). Further, coordination of PCBs and mercury control programs at the regional level will occur through the BAMS Collaborative Monitoring and Pollutants of Concern (MPC) subcommittee.

For cost-effective implementation, this PCBs and Mercury Load Reduction task will be closely coordinated with the GI Planning efforts (Task SMC614) and the Water Quality Monitoring efforts (Task SMC617).

PROJECT TEAM ROLES AND EXPERTISE

Lisa Sabin will serve as the task leader for Mercury and PCBs Load Reduction. Kevin Huniu with EOA and Steve Carter with Paradigm will also play key roles. EOA has extensive experience assisting Bay Area municipalities over the past 20+ years to characterize the urban landscape and begin identifying sources and controls for mercury and PCBs. During that time, we have conducted numerous related projects for SMCWPPP and other countywide stormwater programs. EOA has also taken a lead role coordinating these efforts regionally through the former BASMAA MPC Committee, which is now the BAMSC MPC Subcommittee. EOA staff also served as key members of the C.11/12 workgroup with Water Board staff that was formed to develop the control programs for mercury and PCBs in MRP 3.0. As such we are intimately familiar with the requirements in MRP 3.0 for mercury and PCBs control programs.

Throughout MRP 2.0, EOA provided leadership and guidance on multiple BASMAA regional projects focused on mercury/PCBs controls and permit compliance. EOA led a consultant team that developed guidance materials and protocols for Bay Area municipalities implementing new programs required by the MRP to manage PCBs-containing materials and wastes during building demolition. EOA has continued to assist both SCVURPPP and SMCWPPP on implementing these programs and gathering data needed to evaluate their PCBs load reduction effectiveness. EOA also led the team that collected and analyzed infrastructure caulk samples for PCBs as required in MRP 2.0. EOA developed and implemented the work plan for the regional Stressor/Source Identification (SSID) project on PCBs in electrical utilities and prepared the final report for submission to the Water Board on behalf of all MRP permittees.

EOA project team members have continued to assist Bay Area countywide stormwater programs with all aspects of mercury and PCBs TMDL implementation including identifying source areas, updating pollutant control strategies, developing accounting systems for crediting pollutant load reductions, and conducting associated reporting required by the MRP. EOA and Paradigm worked together in developing countywide Reasonable Assurance Analyses (RAAs) for SMCWPPP and SCVURPPP. The RAAs included development and calibration of hydrologic and water quality models by Paradigm that were used to refine baseline loads of PCBs and mercury discharged to the Bay. The watershed model, based on the Loading Simulation Program in C++ (LSPC), simulated watershed hydrology and water quality processes, in combination with regional methods developed for

assigning PCBs and mercury runoff concentrations, to estimate PCBs and mercury loads associated with various land uses. The LSPC model was linked to SUSTAIN for simulation and cost-optimization of GI implementation, which aided in the determination of cost-effective GI Plans that contribute to countywide efforts to address TMDL Wasteload Allocations for mercury and PCBs. This work culminated in EOA's development of the 2020 Control Measure Plans that described the full menu of implementation actions (GI and other actions) and associated potential schedules and costs for achieving the TMDL Wasteload Allocations for San Mateo County and the Santa Clara Valley. EOA also co-authored the Source Control Load Reduction Accounting for RAA report (SCLRA) that was recently approved by the Water Board. The SCLRA presents the assessment methodologies that will be used during MRP 3.0 to quantify mercury/PCBs load reductions for pollutant control programs identified in Provisions C.11 and C.12.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for PCBs and Mercury Load Reduction are described in Table 9.1. Table 9.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 9.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

Table 9.1 Descriptions, deliverables, and cost estimates for PCBs and Mercury Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC619.01: LOAD REDUCTION ACCOUNTING			
FY 2024/25	<p>EOA will assist C/CAG member agencies to document PCBs and mercury control measure implementation (including documenting implementation from the previous permit term) and revisions, if any, to the measurement and estimation methodologies related to PCBs and mercury load reductions, consistent with Provisions C.11/12.a. EOA will document all mercury/PCBs control measures credited in the previous permit to demonstrate continued implementation at the appropriate intensity. EOA will help member agencies gather the data needed to track control program implementation during MRP 3.0 and to calculate mercury/PCBs load reductions consistent with the approved methodologies in the SCLRA report. For GI implementation, data collection and load reduction accounting will be coordinated with efforts described under Task SMC414 (GI Tracking Tool and updates to the RAA). For all other control programs (C.11.b. – C.11.d. and C.12.b. – C.12.e., C.12.g.), EOA will develop and maintain tracking and reporting spreadsheets (and associated GIS layers identifying project locations, as appropriate) designed for each control program that describe the types and locations of controls implemented each year, provide all required supporting data, and calculate the mercury/PCBs loads reduced using the accounting methodologies described in the SCLRA report. These spreadsheets will provide the required data when estimated loads reduced during the permit term are reported later in the 2026 Annual Report.</p>	<ul style="list-style-type: none"> • Control Program Tracking Spreadsheets and ongoing updates for the following control programs in Provisions C.11 and C.12: <ul style="list-style-type: none"> ○ Source Property Identification and Abatement ○ Control Measure Implementation in Old Industrial Areas ○ Mercury Collection and Recycling Implemented throughout the County ○ Controlling PCBs from Bridges and Overpasses ○ Controlling PCBs from Electrical Utilities ○ Manage PCB-containing Materials and Wastes during Building Demolition - Activities 	\$14,854
SUBTASK SMC619.02: SOURCE PROPERTY IDENTIFICATION AND ABATEMENT			
FY 2024/25	<p>EOA will plan and implement a coordinated Countywide Program for source property identification and abatement to investigate 1,411 acres of likely PCBs source properties during the permit term, consistent with Provisions C.11.b. and C.12.b. The source property identification and abatement program will involve of the following steps: (1) Verification/screening monitoring (stormwater and/or sediment sampling) to identify high priority catchments that have elevated PCBs/mercury, (2) targeted public ROW investigations including records review and public ROW surveys and sampling (stormwater and/or sediment samples), and if needed (3) on-site inspections and sampling (sediment samples) to identify properties that contribute elevated mercury/PCBs to the MS4 (i.e., moderate or high PCBs source properties). Verification/screening monitoring for PCBs/mercury will be conducted under Task SMC617, POC monitoring sub-task.</p> <p>During FY 2023/24, EOA developed a workplan that outlines the source investigation steps and proposed timeline for achieving the MRP 3.0 requirement of investigating 1,411 acres during the permit term. Each year, EOA will conduct the following tasks to implement the source investigation workplan:</p> <ul style="list-style-type: none"> • Review lab results from previous fiscal year sampling to identify any new high-priority catchments that require targeted investigations. • Conduct targeted investigations in high-priority catchments, including records review, public ROW surveys and sediment sampling in the public ROW. Additional sediment sampling costs are included in Task SMC617, POC monitoring sub-task. • Coordinate with C/CAG member agencies to conduct on-site investigation and sampling to identify moderate and high PCBs/mercury source properties. • Review outcomes of source investigations conducted during the current fiscal year to develop plans for source property investigations and other next steps during the next fiscal year. 	<ul style="list-style-type: none"> • Desktop and field investigations of high priority catchments in the public ROW and/or on-site to collect sediment samples and identify PCBs/mercury source properties. • Prepare for and attend meetings with C/CAG member agency staff to discuss next steps for newly identified source properties, as needed. • Source property referral reports and enhanced O&M plans (as needed for any new source properties identified each year). • Prepare for and attend meetings with Water Board staff (as needed) to review source property referral reports and enhanced O&M plans. • Annual Report sections on source investigations each year, including total acres investigated, source properties identified, new source property referral reports, and enhanced O&M actions associated with new and past referrals. 	\$166,939

Table 9.1 Descriptions, deliverables, and cost estimates for PCBs and Mercury Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
	<p>Each year, EOA will document the acreage of land areas investigated and the location(s) of any identified source properties. FY 2024/25 verification/screening monitoring to identify high priority catchments, and sediment sampling in public ROW areas will consist of the work described in Subtask SMC617.05, Water Quality Monitoring, Pollutants of Concern (POC) Monitoring.</p> <p>As any new source properties are identified, EOA will assist C/CAG's member agencies in determining next steps and provide guidance on referrals or enforcement/abatement actions. As needed, EOA will prepare referral reports and enhanced O&M plans associated with each source property referral and participate in meetings with Water Board staff to discuss these referrals. EOA will also track and report on all ongoing source property investigations, ongoing O&M activities associated with referrals submitted in the past, and at the end of the permit term, provide estimated loads reduced resulting from implementing this control measure.</p>		
SUBTASK SMC619.03: OLD INDUSTRIAL LAND USE CONTROL MEASURE PLAN			
FY 2024/25	<p>EOA will assist C/CAG member agencies in planning and implementing a program for control measure implementation in old industrial areas or other areas with moderate to high levels of PCBs to achieve the MRP 3.0 requirements for treating 445 acres of old industrial areas or other areas with moderate to high PCBs levels, or reducing PCBs loads by 81 grams/yr from these areas. EOA will conduct the following activities under this subtask:</p> <ul style="list-style-type: none"> • Continue to facilitate Old Industrial Workgroup (OIWG) meetings that focus on implementing the countywide plan and schedule (the Plan) for control measures in old industrial areas to achieve the required acres treated or PCBs loads reduced during the permit term. • Assist C/CAG member agencies to plan and implement PCBs control measures described in the Plan to achieve MRP 3.0 requirements for acres treated or PCBs loads reduced from these areas. It is anticipated that the member agencies may need to play a greater role in implementing PCBs controls in these areas than in past years in order to meet the MRP 3.0 requirements. This sub-task will include EOA support to C/CAG member agencies to plan and implement controls on moderate PCBs-contributing properties (MPCPs). • Document all controls implemented in old industrial areas or other areas with moderate to high PCBs at the start of the permit term and each year of the permit thereafter. • Collect data to track and report on all controls implemented each year, consistent with the Plan. Data collection will include all data needed to calculate mercury/PCBs loads reduced resulting from implementing these controls, consistent with approved SCLRA methodologies. 	<ul style="list-style-type: none"> • Prepare agenda and facilitate OIWG meetings as needed (assume 1 meeting) • Annual tracking of controls implemented in old industrial areas, including collection of all supporting data needed to estimate mercury/PCBs loads reduced. • Annual GIS updates of control measures implemented and planned in old industrial areas. • Annual Reports - summaries of the controls implemented each year consistent with the Plan. 	\$31,370

Table 9.1 Descriptions, deliverables, and cost estimates for PCBs and Mercury Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC619.04: PCBs BRIDGE REPLACEMENT/REHABILITATION			
FY 2024/25	<p>EOA will assist C/CAG’s member agencies in planning and implementing activities related to the development of a program for controlling PCBs from bridges and overpasses, pursuant to MRP Provision C.12.d. EOA will conduct the following activities under this subtask:</p> <ul style="list-style-type: none"> • Track development of a related Caltrans specification. • Participate in a regional workgroup to develop guidance for Permittees on implementing the Caltrans specification. • Guidance and tracking to assist C/CAG’s member agencies to implement the Caltrans specification during applicable replacement activities that are under the direction of the member agencies. • Collect data on use of the Caltrans specification during all instances of bridge roadway replacement or repair within member agencies’ jurisdictions. Data collection will include estimates of the volume of material managed and total PCBs mass load reduced. • Initial preparations for calculating (during FY 2025/26) PCBs mass load reduced, consistent with approved SCLRA methodologies, resulting from implementing the Caltrans specification. 	<ul style="list-style-type: none"> • In the September 2024 Annual Report, submit status of tracking the Caltrans specification. • Participate in regional workgroups to develop guidance for implementing the Caltrans specification. • Annual tracking of the use of the Caltrans specification (when available) for any applicable bridge roadway replacement or repair in the County, including all data needed to estimate PCBs loads reduced. 	\$7,703
SUBTASK SMC619.05: PCBs IN ELECTRICAL UTILITIES			
FY 2024/25	<p>EOA will assist C/CAG and its member agencies in planning and implementing a program for controlling PCBs from electric utilities. For the purposes of this subtask, we are assuming that there will not be any municipally owned utilities in San Mateo County during the permit term.</p> <p>MRP 3.0 requires that SMCWPPP and other members of the BAMSC MPC Subcommittee collaborate with the Water Board to request information from non-municipally owned electrical utilities (PG&E) and develop a report that evaluates the information (if received) to determine (a) locations of PCBs-containing OFEE, (b) improve estimates of the total baseline mass of PCBs in OFEE in the permit area, (c) evaluate the actions taken by non-municipally owned electrical utilities to reduce/prevent release of PCBs from their equipment and respond to potential releases, and (d) identify opportunities to improve the response and cleanup protocols.</p> <p>Based on discussions with Water Board staff in spring 2024, EOA anticipates that no information will be received in FY 2024/25. Therefore, no budget is allocated to this subtask.</p>		\$0

Table 9.1 Descriptions, deliverables, and cost estimates for PCBs and Mercury Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC619.06: PCBs/BUILDING DEMOLITION			
FY 2024/25	<p>EOA will assist C/CAG’s member agencies in activities associated with implementing an updated program to manage PCBs-containing materials and wastes during building demolition, per updated requirements in MRP 3.0 C.12.g. During FY 2022/23, EOA assisted with participation in a regional collaboration to update the guidance/protocols for the PCBs management demolition programs developed during MRP 2.0 to meet new MRP 3.0 requirements, including:</p> <ul style="list-style-type: none"> • Advance notification procedures for demolition activities. • Enhanced construction site inspections during demolition. • Enhancements to construction site control programs to minimize migration of PCBs into the MS4 during demolition activities. • Verification of proper disposal of demolished building materials. <p>In FY 2024/25, EOA will continue to conduct the following activities to assist C/CAG and its member agencies with the ongoing and updated programs:</p> <ul style="list-style-type: none"> • Assist C/CAG staff with providing ongoing administrative and technical support to member agencies for their ongoing efforts to comply with data collection and reporting requirements under MRP Provision C.12.g. • Answer questions from member agencies as they incorporate, implement, and report on their updated MRP 3.0 protocols for PCBs management during demolition. • Assist C/CAG staff to collect data from member agencies on a quarterly basis as needed for annual reporting on the updated protocols. 	<ul style="list-style-type: none"> • Assistance to C/CAG staff with providing ongoing administrative and technical support member agencies for their ongoing efforts by to comply with data collection and reporting requirements under MRP Provision C.12.g. • Annual reporting of the data collected on the use of the PCBs in building demolition protocol. 	\$7,552
SUBTASK SMC619.07: CONTROL MEASURES PLAN AND RAA UPDATE FOR ACHIEVING PCBs AND MERCURY TMDLS			
FY 2024/25	<p>EOA will work with C/CAG’s member agencies to prepare updates to the San Mateo Countywide Control Measures Plan (CMP) and RAA for Achieving PCBs and Mercury TMDLs for the San Francisco Bay. Work performed under this subtask will be coordinated with the efforts described under Task SMC614 that are focused on GI project tracking and updating the RAA modeling tools for GI planning. In future years, EOA will develop a workplan for updating the CMP, which will be coordinated with the workplan developed under Subtask SMC614.03 during FY 2023/24 for updating the RAA/modeling work that will be used to develop the updated CMP. The workplan will identify all the required elements of the updated RAA/CMP as identified in the MRP, including:</p> <ul style="list-style-type: none"> • Identify all technically and economically feasible PCBs control measures and provide a schedule for implementation. • Evaluate PCBs load reductions, costs, efficiency, and significant environmental impacts from implementation of these control measures. • Identify all control measures implemented during the current permit term and additional controls to be implemented in the subsequent term. Include a description of the intensity or extent of implementation, accountability metrics to track in the future, and estimates for load reductions to be achieved through implementation of controls during subsequent permit term at proposed intensity. <p>EOA will begin to implement the workplan starting in FY 2024/25 in order to prepare and submit an updated CMP/RAA in March 2026. Please note that updates to modeling tools for RAA are scoped and budgeted under Subtask SMC614.03.</p>	<ul style="list-style-type: none"> • Workplan for developing an updated CMP (in coordination with Task SMC614 RAA/modeling). • Ongoing tracking of all controls implemented/planned during the permit term to support development of the updated CMP/RAA report due in March 2026. Budgeted under Subtask SMC619.01. 	\$16,330

Table 9.1 Descriptions, deliverables, and cost estimates for PCBs and Mercury Load Reduction subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC619.08: RMP FATE AND TRANSPORT			
FY 2024/25	EOA will participate in the Regional Monitoring Program PCBs Fate and Transport Workgroup (PCBs Workgroup) on behalf of C/CAG and its member agencies. This Workgroup facilitates studies concerning the fate, transport, and biological uptake of PCBs discharged from urban runoff to San Francisco Bay margin areas. These studies are intended to fulfill the requirements of MRP Provision C.12.i. EOA will attend the PCBs Workgroup meetings. In FY2023/24, EOA coordinated with other RMP Program participants to develop a workplan that describes how the RMP studies under the PCBs Workgroup will provide understanding of in-Bay transport of PCBs discharged in urban runoff, the sediment and food web PCBs concentrations in margin areas receiving urban runoff, the influence of urban runoff on the patterns of food web PCBs accumulation, especially in Bay margins, and the identification of drainages where urban runoff PCBs are particularly important in food web accumulation. EOA will continue to attend PCBs Workgroup meetings during FY 2024/25 and update C/CAG and its member agencies on the PCBs Workgroup's projects.	<ul style="list-style-type: none"> • Participation in two meetings of the RMP's PCBs workgroup. • Annual reporting on the PCBs Workgroup's projects conducted each year. 	\$3,796
SUBTASK SMC619.09: RISK REDUCTION			
FY 2024/25	EOA will assist C/CAG and its member agencies to continue coordinating and reporting on risk reduction efforts by San Mateo County Environmental Health (CEH). EOA will compile available related data from CEH and incorporate into a section of the Countywide Program's Annual Report that addresses these MRP Provision C.12.j. reporting requirements. EOA will provide annual status reports that describe the CEH risk reduction efforts, identify actions taken, estimate the number of people reached, and why these people are deemed likely to consume Bay fish.	<ul style="list-style-type: none"> • In SMCWPPP Annual Report provide status of CEH risk reduction efforts, identify actions taken, estimate the number of people reached, and why these people are deemed likely to consume Bay fish. 	\$4,262

Table 9.2. Schedule for completing PCBs and Mercury Load Reduction subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC619.01	Load Reduction Accounting			•										
SMC619.02	Source Property Identification and Abatement			•										
SMC619.03	Old Industrial Land Use Control Measure Plan			•					•					
SMC619.04	PCBs Bridge Replacement/Rehabilitation			•										
SMC619.05	PCBs in Electrical Utilities			•										
SMC619.06	PCBs/Building Demolition													
SMC619.07	Control Measures Plan and RAA Update for Achieving PCBs/Mercury TMDLs			•										
SMC619.08	RMP Fate and Transport			•					•					•
SMC619.09	Risk Reduction			•										

Table 9.3. Estimated costs for completion of PCBs and Mercury Load Reduction subtasks and deliverables.

Subtask	EOA Staff Position													EOA Expenses	Kinnetic	Budget			
	Hourly Rate:	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I				Assistant	Technician	Clerical
FY 2024/25		\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77			
SMC619.01 Load Reduction Accounting	--	--	--	--	12	--	--	0	--	--	76	--	--	--	--	--	\$150	--	\$14,854
SMC619.02 Source Property Identification and Abatement	--	--	--	--	142	--	--	306	--	--	168	--	--	--	--	--	\$525	\$49,708	\$166,939
SMC619.03 Old Industrial Land Use Control Measure Plan	--	--	--	--	48	--	--	64	--	--	50	--	--	--	--	--	\$400	--	\$31,370
SMC619.04 PCBs Bridge Replacement/Rehabilitation	--	--	--	--	20	--	--	16	--	--	0	--	--	--	--	--	\$75	--	\$7,703
SMC619.05 PCBs in Electrical Utilities	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	\$0	--	\$0
SMC619.06 PCBs/Building Demolition	--	--	--	--	6	--	--	32	--	--	0	--	--	--	--	--	\$150	--	\$7,552
SMC619.07 Control Measures Plan and RAA Update for Achieving PCBs/Mercury TMDLs	--	--	--	--	44	--	--	32	--	--	0	--	--	--	--	--	\$150	--	\$16,330
SMC619.08 RMP Fate and Transport	--	--	--	--	16	--	--	0	--	--	0	--	--	--	--	--	\$100	--	\$3,796
SMC619.09 Risk Reduction	--	--	--	--	6	--	--	0	--	--	18	--	--	--	--	--	\$50	--	\$4,262
		0	0	0	0	294	0	450	0	0	312	0	0	0	0	0	\$1,600	\$49,708	\$252,806

TASK SMC620 – EXEMPTED AND CONDITIONALLY EXEMPTED DISCHARGES

For Exempted and Conditionally Exempted Discharges, the following sections describe EOA’s understanding of the task and approach, the roles of our project team and their expertise, and our scope-of-work (including subtask deliverables and budgets).

UNDERSTANDING AND APPROACH

MRP 3.0 Provision C.15 Exempted and Conditionally Exempted Discharges has requirements related to groundwater discharges, air conditioning condensate, residential car washing, swimming pool/hot tub/spa/fountain water discharges, irrigation water/landscape irrigation/lawn watering and emergency fire fighting discharges. With the exception of emergency fire fighting discharges, there were no significant changes to these conditionally exempt discharge requirements in MRP 3.0 compared to MRP 2.0. Therefore, with the exception of fire fighting discharges, other types of conditionally exempt discharges will be addressed by the CII Subcommittee (Subtask SMC612.03) or the Public Information and Participation Subcommittee (Subtask SMC612.07).

Requirements in Provision C.15.b.iii. Emergency Discharges of Firefighting Water and Foam were substantially revised in MRP 3.0. This subprovision requires the formation of a regionwide Firefighting Discharges Workgroup that addresses the new requirements in C.15.b.iii. This Workgroup, including representatives from the Regional Water Board and U.S. EPA Region 9, began meeting during FY 2022/23 with EOA staff representing SMCWPPP, must continue to meet at least twice per year in FY 2024/25, and then annually in the remaining years of the permit term. EOA staff will continue to participate in the Workgroup during FY 2024/25 on behalf of SMCWPPP and C/CAG’s member agencies.

There are a number of requirements that must be addressed by the regional workgroup including:

- Assess adequacy of existing BMPs and standard operating procedures (SOPs);
- Assess adequacy of existing resources;
- Investigate which firefighting foams are the least environmentally harmful;
- Develop outreach materials on containment and cleanup for contractors and distribute by September 2025; and
- Discuss reporting on emergency discharges of firefighting water and foam.

A regional Firefighting Discharge Report, reporting on the items above, is due September 30, 2025. This report is being developed through BAMSC. A BAMSC Task Force, or working group, was also formed to work on the regional deliverables, including coordinating outside organization participation in the Regional Workgroup.

EOA is anticipating there may be county specific activities related to developing and distributing outreach materials on containment and cleanup for contractors by September 30, 2025. Additionally, there are activities listed under ongoing implementation that must be implemented by Permittees and reported on in annual reports. These activities include implementing recommendations of the regional report, ensure proper BMPs and SOPs are included in contracts for containment and cleanup, evaluate adequacy of large industrial site’s BMPs and SOPs for containment and cleanup of emergency firefighting discharges and train municipal staff and contractors hired by Permittees on BMPs and SOPs for containment and cleanup. These activities will be coordinated, as budget allows, through the Municipal Maintenance Subcommittee (Subtask SMC612.01), the CII Subcommittee (Subtask SMC612.03) and the Training Task (SMC613). The EOA task leader will also provide updates to the C/CAG Stormwater Committee as needed (via Subtask SMC611.02, Stormwater Committee Support).

PROJECT TEAM ROLES AND EXPERTISE

Kristin Kerr, P.E. will serve as the task leader. Kristin has extensive experience assisting SMCWPPP, ACCWP and SCVURPPP with Provision C.5 illicit discharge detection and elimination activities, and the Countywide

Program and SCVURPPP Municipal Maintenance subcommittees. Kristin also has experience with documenting and providing guidance on BMPs related to the Statewide Potable Drinking Water System Discharges General Permit. Kristin will be assisted by other EOA staff as appropriate. EOA does not plan to use subcontractors for this task.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables, and budgets for Exempted and Conditionally Exempted Discharges are described in Table 10.1. Table 10.2 provides the subtask schedules. The schedules are based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 10.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA and subcontractor staff labor hours and expenses.

Table 10.1 Descriptions, deliverables, and cost estimates for Firefighting Discharges subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC620.01: FIREFIGHTING DISCHARGES			
FY 2024/25	EOA will provide support to the countywide and regional efforts to develop the regional Firefighting Discharge Report. EOA staff will participate in regionwide Firefighting Discharges Working Group and Task Force meetings on behalf of SMCWPPP and San Mateo County Permittees. The BAMSC FY 2024/25 in-kind contribution is \$9,576	<ul style="list-style-type: none"> • Support for development of draft and final Regional Firefighting Discharge Report. • Participation in two meetings of the regional Firefighting Discharges Working Group and two meetings of the regional Task Force. 	\$9,807
SUBTASK SMC620.02: REPORTING			
FY 2024/25	EOA will assist C/CAG member agencies with ongoing implementation practices and annual reporting for Provisions C.15.b.iii.(3)(a)-(c). This includes providing status updates and working with the Steering Committee, CII Subcommittee and Municipal Maintenance Subcommittee, as needed, to provide comments on regional deliverables, recommendations and implementation guidance. This subtask includes on-call assistance to municipal staff members by responding to their emails and telephone calls, as possible within the available budget.	<ul style="list-style-type: none"> • Development of SMCWPPP reporting guidance. • On-call assistance to municipal staff members as possible within the available budget. 	\$7,772

Table 10.2. Schedule for completing Firefighting Discharges subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25														
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025			
SMC620.01	Firefighting Discharges															
	Participate in up to two regionwide Firefighting Discharges Working Group meetings annually and regionwide Task Force meetings, as needed				•	•							•	•		
	Support development of draft and final regional Firefighting Discharge Report														•	
SMC620.02	Reporting															
	Assist member agencies with implementation, as budget allows															
	Develop and update reporting guidance															•

Table 10.3. Estimated costs for completion of Firefighting Discharges subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Budget
	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical		
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77		
FY 2024/25																	
SMC620.01 Firefighting Discharges	--	22	--	--	--	--	--	--	--	--	27	--	--	--	--	\$200	\$9,807
SMC620.02 Reporting	--	16	--	--	--	--	--	--	--	--	24	--	--	--	--	\$100	\$7,772
	0	38	0	0	0	0	0	0	0	0	51	0	0	0	0	\$300	\$17,579

TASK SMC621 – UNSHELTERED POPULATIONS

For Unsheltered Populations the following sections describe EOA’s understanding of the task and approach, the roles of our project team and their expertise, and our scope-of-work (including subtask deliverables and budgets).

UNDERSTANDING AND APPROACH

Provision C.17, Discharges Associated with Unsheltered Homeless Populations, is a provision new to MRP 3.0. There are two main areas of implementation and reporting for this provision:

- Mapping of approximate locations of unsheltered homeless populations; and
- Identifying, implementing, and reporting on Best Management Practices (BMPs) to address MS4 discharges associated with homelessness that impact water quality.

Provision C.17 required that a regional BMP report be developed and submitted by Permittees with their September 2023 Annual Report. This report was developed through BAMSC. EOA assisted C/CAG to provide in-kind support to the BAMSC regional project developing the report. EOA plans on assisting with a response to Regional Water Board staff comments on the Regional Report, as needed. This task includes participation on behalf of C/CAG’s member agencies in the BAMSC Unsheltered Population Workgroup formed to help address Provision C.17 requirements.

In addition to the regional report, each C/CAG member agency must report on BMPs being implemented, including effectiveness evaluation, in their 2025 Annual Reports. Individual member agencies must also submit maps of approximate locations of unsheltered homeless populations within their jurisdictions with the 2025 Annual Reports. The maps will need to identify the locations of encampments in relation to storm drain inlets, creeks, flood control channels or other surface water bodies. C/CAG member agencies submitted similar BMP effectiveness evaluations and maps in their 2023 Annual Reports. EOA is continuing to support C/CAG member agencies in developing/updating maps of unsheltered populations for the 2025 Annual Reports. EOA has access to GIS layers for storm drain inlets, creeks, and flood control channels from work on the Sustainable Streets Master Plan and trash control planning. EOA will supplement these data layers with data from biennial point-in-time census surveys and other information provided by the member agencies to identify unsheltered homeless population approximate locations. As with the 2023 maps, EOA will coordinate with the San Mateo County Human Services Agency for the point-in-time census data.

The EOA task leader will also coordinate with the SMCWPPP Municipal Maintenance, Trash, and CII Subcommittees as needed. EOA will work with the BAMSC Unsheltered Population Workgroup to respond to Regional Water Board comments on the Regional Report, or develop guidance to assist with the development of maps and BMP effectiveness reporting. The draft mapping guidance and the draft BMP Report will be provided to SMCWPPP Permittees for review and comment.

PROJECT TEAM ROLES AND EXPERTISE

Kristin Kerr will serve as the task leader. Kristin has extensive experience assisting the Countywide Program and ACCWP and SCVURPPP with Provision C.5 illicit discharge detection and elimination activities, as well as numerous other subcommittees and workgroups. Kristin will be assisted by other EOA staff as appropriate (e.g., GIS technicians). EOA is not using subcontractors for this task.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables, and budgets for Unsheltered Populations are described in Table 11.1. Table 11.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and member agency needs. EOA will work closely with C/CAG staff to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 11.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA staff labor hours and expenses.

Table 11.1 Descriptions, deliverables, and cost estimates for Unsheltered Populations subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC621.01: MAPPING			
FY 2024/25	EOA will provide support to assist C/CAG member agencies in developing/updating maps of unsheltered populations. This task includes on-call assistance to municipal staff members by responding to their emails and telephone calls. Maps must be submitted in the September 2025 Annual Reports.	<ul style="list-style-type: none"> • GIS technical support to C/CAG's Permittees for mapping. • On-call communications with municipal staff. 	\$22,541
SUBTASK SMC621.02: REPORTING			
FY 2024/25	<p>EOA will support the countywide and regional efforts to respond to Regional Water Board comments on the Regional Report documenting BMPs and programmatic efforts to address non-stormwater discharges associated with unsheltered populations.</p> <p>EOA staff will participate in the BAMSC Unsheltered Population Workgroup on behalf of SMCWPPP. EOA will also continue to facilitate the SMCWPPP Unsheltered Population Workgroup that was convened in FY 2022/23, including preparing meeting agendas and summaries, providing updates on regional work, and developing reporting guidance for SMCWPPP Permittee September 2025 Annual Reports.</p>	<ul style="list-style-type: none"> • Participation in one meeting of the BAMSC Unsheltered Population Workgroup. • Support for development of a response to comments on the regional BMP report. • Facilitation of the SMCWPPP Unsheltered Population Workgroup. • Updated guidance for SMCWPPP Permittees on Annual Reporting for tasks related to unsheltered populations. 	\$14,896

Table 11.2. Schedule for completing Unsheltered Populations subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25														
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025			
SMC621.01	Mapping															
	Update maps of unsheltered homeless populations in Permittee jurisdictions															•
SMC621.02	Reporting															
	Participate in one BAMSC Unsheltered Populations Work Group meeting and provide support for development of the Regional BMP Report												•			
	Facilitate SMCWPPP Unsheltered Populations Work Group, as needed															
	Update Annual Reporting guidance															•

Table 11.3. Estimated costs for completion of Unsheltered Populations subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Budget
	Principal	Senior Manager I	Manager III	Manager II	Manager I	Tech Specialist I	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician	Clerical		
Hourly Rate:	\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77		
FY 2022/23 (August - June)																	
SMC421.01 Mapping	--	24	--	--	--	--	--	--	--	--	105	--	--	--	--	\$200	\$22,541
SMC421.02 Reporting	--	24	--	--	--	40	--	--	--	--	--	--	--	--	--	\$200	\$14,896
	0	48	0	0	0	40	0	0	0	0	105	0	0	0	0	\$400	\$37,437

TASK SMC622 – COST REPORTING

For Cost Reporting, the following sections describe EOA’s understanding of the task and approach, the roles of our project team members and their expertise, and the scope-of-work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

Federal NPDES regulations require descriptions of the financial resources available to municipalities and their budgets for existing stormwater programs, including an overview of a municipality’s financial resources and budget, overall indebtedness and assets, and sources of funds for stormwater programs. The regulations also require an analysis of the capital and operation and maintenance expenditures necessary to accomplish the activities of the programs, including a description of the source of funds that are proposed to meet the necessary expenditures and legal restrictions on the use of such funds. Such fiscal analysis and cost reporting can provide a useful tool for evaluating program implementation and effectiveness. Standardization of the cost reporting is essential. Consistent and reliable cost information can help Permittees to manage their assets, programs, funding strategies, and potential future credit programs and stormwater utility fees.

Provision C.20 of MRP 3.0 is a new provision, requiring each Permittee to submit an annual fiscal analysis of the capital and operation and maintenance costs incurred to comply with MRP 3.0’s requirements (listed in Provision C.20.b.(iii)). The analysis is required to include a description of the source of funds for necessary expenditures, including legal restrictions on the use of such funds, and identify any funding resources shared on a regional or countywide basis. During FY 2022/23, EOA assisted C/CAG to participate in a regional collaboration to develop a cost reporting framework and fiscal analysis methodology, in collaboration with San Mateo County Permittees, other Bay Area countywide stormwater programs, and Water Board staff. The project team is also tracking statewide efforts currently underway to develop a cost reporting framework. The Bay Area Regional Cost Reporting Framework and Guidance Manual were submitted to the Water Board by the June 30, 2023 deadline in MRP 3.0. During FY 2023/24, EOA assisted with responses to Water Board staff comments, made corresponding revisions to the Framework and Guidance Manual, and resubmitted them to the Water Board at the end of March. EOA will also provide a training to San Mateo County Permittees on the use of the Framework and how to prepare their fiscal analyses.

Subsequently, starting with their FY 2024/25 Annual Reports (per MRP 3.0 requirements), as feasible within available budget, EOA will assist Permittees to submit their fiscal analyses annually according to the accepted cost reporting framework and methodology.

PROJECT TEAM ROLES AND EXPERTISE

Jill Bicknell, P.E., will serve as the task leader for this task, assisted by Ileana Alvarado and other EOA staff as appropriate. Jill led the development of the Bay Area Regional Cost Reporting Framework and Guidance Manual and has been the point person for communication with Regional and State Water Board staff during its development. She also facilitated the BAMSC Regional Cost Reporting Workgroup, in which the Program Director and some San Mateo County Permittees participated. Ileana developed the Excel-based Framework Tool and is well qualified to provide technical assistance with use of the Tool.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for Cost Reporting are described in Table 12.1. Table 12.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and C/CAG member agency needs. EOA will work closely with the Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are achieved. Table 12.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA labor hours and expenses.

Table 12.1 Descriptions, deliverables, and cost estimates for Cost Reporting subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC622.01: DEVELOP COST REPORTING FRAMEWORK AND METHODOLOGY			
FY 2024/25	EOA will support San Mateo County Permittees to develop their first annual fiscal analysis due with the FY 2024/25 Annual Reports by answering Permittee questions, as possible within the available budget.	<ul style="list-style-type: none"> On-call support to San Mateo County Permittees during development of their first annual fiscal analysis due with the FY 2024/25 Annual Reports by answering questions, as possible within available budget. 	\$5,012

Table 12.2. Schedule for completing Cost Reporting subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25												
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	
SMC622.01	Assist with Responses to Comments on Framework and On-call Support to Permittees													

Table 12.3. Estimated costs for completion of Cost Reporting subtasks and deliverables.

Subtask	EOA Staff Position															Budget	
	Hourly Rate:	Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician		Clerical
FY 2024/25		\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77	
SMC622.01 Assist Permittees with Fiscal Analyses of Permit Compliance C	--	16	--	--	--	--	--	--	--	6	--	--	--	--	--	--	\$100
	0	16	0	0	0	0	0	0	0	6	0	0	0	0	0	0	\$100
																	\$5,012

TASK SMC623 – ASSET MANAGEMENT

For Asset Management, the following sections describe EOA's understanding of the task and approach, the roles of our project team members and their expertise, and scope-of-work (including subtask deliverables, schedules, and budgets).

UNDERSTANDING AND APPROACH

MRP 3.0 Provision C.21 requires each Permittee to develop and implement an Asset Management (AM) Plan by June 30, 2025. Requirements in C.21 are focused on managing water quality-related hard assets, primarily stormwater treatment measures and trash capture devices. The AM Plan must include: a description and inventory of assets; an Operations, Maintenance, Rehabilitation and Replacement Plan (AM O&M Plan); evaluation of implementation costs for the permit term and comparison with funding sources; and a tracking and reporting strategy. The AM O&M Plan must include a process for prioritizing and scheduling maintenance and a process for evaluating current condition and completing rehabilitation or replacement of assets as needed, based on a risk-based condition assessment and corresponding performance level and effectiveness.

The EOA project team will support C/CAG member agencies with the development of jurisdictional AM Plans, asset inventories, and AM O&M Plans per Provisions C.21.a. and C.21.b. Our approach is to help agencies build on existing data management systems and O&M guidance and procedures to the extent possible to minimize costs of this new provision. During FY 2023/24, EOA helped form an AM Workgroup with representatives from the New Development, Trash, and Municipal Maintenance Subcommittees, and other interested agency staff, to discuss agency needs and best approach(es) for building on existing systems in an efficient manner. One of the key systems available for this purpose is the San Mateo Countywide GI Tracking Tool, which may be adapted to address AM tracking and reporting needs. EOA has begun assisting C/CAG with development of regionally consistent model documents and templates for developing San Mateo County municipality AM Plans, asset inventories, AM O&M Plans, and guidance on reporting requirements for each fiscal year. Work during FY 2024/25 will continue the Workgroup meetings and build upon the draft framework to develop templates for Asset Management Plans and Asset Management O&M Plans.

As described in Task SMC614, the EOA project team (Paradigm) led development of the GI Tracking Tool and is continuing to add features to the Tool to increase its value to C/CAG member agencies. Paradigm worked closely with EOA, who has years of experience supporting C/CAG and jurisdictions with annual reporting, to develop a system that provides web-based visualization and tracking of implemented GI projects and can provide essential information to aid in efficient tracking and reporting on these and other assets. EOA also has significant expertise in development of facility management and inspection data systems, from tracking spreadsheets to cloud-based data storage, mapping, and analysis, such as the Access ACCWP Facility Stormwater Inspection database and the web-based SCVURPPP Stormwater Treatment Measure Data Portal. EOA has also developed guidance and conducted training on stormwater treatment measure and trash capture device maintenance which can be incorporated into the AM model documents and templates.

PROJECT TEAM ROLES AND EXPERTISE

Jill Bicknell, P.E. will serve as the task leader for Asset Management, bringing her experience with LID/GI design and O&M and workgroup facilitation, and will help coordinate this task with Task SMC414 GI Planning activities and products. Kristin Kerr, Lisa Sabin, and other EOA staff with data management experience will assist with this task as appropriate. Steve Carter, Chris Carandang, and others at Paradigm will lead the planning and implementation of updates to the GI Tracking Tool to provide AM capability as needed, using their expertise described above.

SCOPE-OF-WORK, SCHEDULE, AND DETAILED COST ESTIMATE

Subtask descriptions, deliverables and budgets for Asset Management are described in Table 13.1. Table 13.2 provides the subtask schedules. The schedule is based on our current understanding of MRP 3.0 requirements and C/CAG member agency needs. EOA will work closely with the Program Director to review and (as necessary) modify the schedule prior to initiating subtasks, to ensure that both compliance and internal schedules are

achieved. Table 13.3 provides a detailed cost estimate for each subtask including a breakdown of estimated EOA staff labor hours and expenses.

Table 13.1 Descriptions, deliverables, and cost estimates for Asset Management subtasks.

FISCAL YEAR	SUBTASK DESCRIPTION	DELIVERABLES	BUDGET
SUBTASK SMC623.01: DEVELOP ASSET MANAGEMENT PLAN MODEL DOCUMENTS/TEMPLATES			
FY 2024/25	EOA will continue to assist C/CAG member agencies with the development of Asset Management (AM) Plans, asset inventories, and Operations and Maintenance, Rehabilitation and Replacement Plans (AM O&M Plans) to meet the requirements of Provision C.21. It is assumed that there will be some level of regional collaboration on AM approaches, and EOA will attend regional workgroup meetings on behalf of C/CAG. EOA will also continue to convene, as needed, the San Mateo Countywide Asset Management Workgroup formed during FY 2023/24 to continue discussions of member agency needs and best approach(es) for assistance from the Countywide Program. Building on the draft framework completed in FY 2023/24, EOA will develop an AM Plan template and an AM O&M Plan template for Permittees to use to develop local Plans during FY 2024/25.	<ul style="list-style-type: none"> Representation of C/CAG at up to two regional collaboration meetings on AM planning. Facilitation of up to two meetings of a San Mateo AM Workgroup, including agendas, handouts, and meeting notes. Draft AM Plan template. Draft AM O&M Plan template. On-call support to San Mateo County Permittees during development of their AM Plans due with the FY 2024/25 Annual Reports by answering questions, as possible within available budget. 	\$19,988

Table 13.2. Schedule for completing Asset Management subtasks and deliverables (symbolized as white dots).

No.	Task	FY 2024/25											
		Jul 2024	Aug 2024	Sep 2024	Oct 2024	Nov 2024	Dec 2024	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025
SMC623.01	Develop Asset Management Model Documents/Templates				•			•		•		•	

Table 13.3. Estimated costs for completion of Asset Management subtasks and deliverables.

Subtask	EOA Staff Position															EOA Expenses	Budget		
	Hourly Rate:	Principal	Senior Manager	Manager III	Manager II	Manager I	Tech Specialist	Senior III	Senior II	Senior I	Associate III	Associate II	Associate I	Assistant	Technician			Clerical	
FY 2024/25		\$252	\$244	\$237	\$234	\$231	\$221	\$212	\$188	\$168	\$160	\$157	\$128	\$116	\$103	\$77			
SMC623.01	Develop Asset Management Model Documents/Templat	4	24	8	--	8	--	20	--	30	--	--	--	--	--	--	--	\$100	\$19,988
		4	24	8	0	8	0	20	0	30	0	0	0	0	0	0	0	\$100	\$19,988

TASK SMC624 – OVERALL CONTINGENCY

A Contingency is included to allow for quick response to shifting project needs and MRP requirements. During MRP 3.0, Regional Water Board staff and the Executive Officer (EO) have added requirements for monitoring, investigations, and reporting through the EO approval process and via comment letters on various SMCWPPP and regional reports. Example subtasks that may be included in Task SMC613 include, but are not limited to:

- The BAMSC Steering Committee may recommend authorization of regional collaborative projects that exceed the budget included in Subtask SMC611.05. These may allow for timely work plans that support regional grant funding, such as through the USEPA's San Francisco Bay Water Quality Improvement Fund.
- C/CAG staff may request additional trainings in response to Permittee requests or other needs identified through Subcommittee discussions.
- Task SMC617 Monitoring needs may expand if unexpected climatic conditions are encountered and/or if the novel monitoring methods implemented during MRP 3.0 require modification.

This Contingency provides C/CAG staff with the option to approve, on an as-needed basis, such in-kind participation in any countywide or regional collaborative projects related to MRP compliance that may arise, up to the overall task budget of \$21,695. Staffing, scope, and budget details under this task will be developed as part of any authorization from C/CAG staff. For the purpose of this scope of work, it is assumed this budget would be expended during the 12-month FY 2024/25 time period.