

FY 2023 / 2024 Annual Report



SAN MATEO COUNTYWIDE
**Water Pollution
Prevention Program**

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DRAFT August 30, 2024



Credits

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**San Mateo Countywide Water Pollution Prevention Program (SMCWPPP)
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A Program of the City/County Association of Governments (C/CAG)

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- CASQA FY 2023-24 Our Water Our World (OWOW) Report, California Stormwater Quality Association, August 2024.

LIST OF ACRONYMS

AGOL	ArcGIS On-line
BAMSC	Bay Area Municipal Stormwater Collaborative
BASMAA	Bay Area Stormwater Management Agencies Association
BAWSCA	Bay Area Water Supply and Conservation Agency
BMPs	Best Management Practices
BSM	Biotreatment Soil Mix
C3TG	C.3 Stormwater Technical Guidance
CALBIG	California Building Inspectors Group
CASQA	California Stormwater Quality Association
C/CAG	City/County Association of Governments of San Mateo County
CII	Commercial/Industrial/Illicit Discharge
DIY	Do-It-Yourself
DO	Dissolved Oxygen
DPR	Department of Pesticide Regulation
ECWG	RMP Emerging Contaminant Work Group
EHS	San Mateo County Environmental Health Services
EPA	Environmental Protection Agency
FSLRRD	San Mateo County Flood and Sea Level Rise Resiliency District
FY	Fiscal Year
GSRD	Gross Solids Removal Device
GI	Green Infrastructure
GIS	Geographic Information System
HHW	Household Hazardous Waste
IPM	Integrated Pest Management
JPA	Joint Powers Authority
LID	Low Impact Development
MRP	Bay Area Stormwater NPDES Municipal Regional Permit
MS4	Municipal Separate Storm Sewer System
NDS	New Development Subcommittee
NPDES	National Pollutant Discharge Elimination System

O&M	Operations and Maintenance
OFEE	Oil-filled Electrical Equipment
OICMP	Old Industrial Area Pollutant Control Measure Plan
OVTA	On-land Visual Trash Assessment
OWOW	Our Water Our World
PCBs	Polychlorinated Biphenyls
PIP	Public Information and Participation
PLDA	Private Land Drainage Area
POC	Pollutants of Concern
POTW	Publicly Owned Treatment Works (sewage treatment plants)
QAPP	Quality Assurance Project Plan
QSD/QSP	Qualified Stormwater Pollution Prevention Plan Developer/Practitioner
RAA	Reasonable Assurance Analysis
RMP	San Francisco Estuary Regional Monitoring Program
SAP	Sampling and Analysis Plan
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SFEP	San Francisco Estuary Partnership
SFEI	San Francisco Estuary Institute
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SOP	Standard Operating Procedure
STLS	Small Tributaries Load Strategy
SWRP	Stormwater Resource Plan
SWPPP	Stormwater Pollution Prevention Plan
TAC	Technical Advisory Committee
TIP	Trash Inspection Program
TMA	Trash Management Area
TMDL	Total Maximum Daily Load
UCMR	Urban Creeks Monitoring Report
VSQG	Very Small Quantity Generator
WARP	Workgroup Advancing Regional Projects
WLA	Waste Load Allocation
WOW	Watching Our Watersheds
WY	Water Year

EXECUTIVE SUMMARY

INTRODUCTION

This FY 2023/24 Annual Report was developed in compliance with the reissued National Pollutant Discharge Elimination System (NPDES) Municipal Regional Permit (referred to as the MRP)¹ for stormwater runoff discharges from San Mateo County and certain other San Francisco Bay Area communities. It summarizes stormwater management activities implemented by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP or Countywide Program) in FY 2023/24. SMCWPPP's activities benefit 22 municipal agencies in San Mateo County: 15 cities, five towns, the County of San Mateo, and the San Mateo County Flood and Sea Level Rise Resiliency District (FSLRRD, also referred to as OneShoreline). Each of these agencies also separately submits an individual Annual Report to the San Francisco Bay Regional Water Quality Control Board (Water Board) focusing on that agency's stormwater management activities during FY 2023/24.

SMCWPPP is a program of the City/County Association of Governments (C/CAG) of San Mateo County. C/CAG is a Joint Powers Authority (JPA) that addresses issues of regional importance to San Mateo County jurisdictions such as congestion management and water quality. The C/CAG Board of Directors is comprised of a local elected city council representative from each city and town in San Mateo County, a member of the County Board of Supervisors, and representatives from the transit district and transportation authority. A 1993 amendment to the JPA Agreement made C/CAG responsible for assisting San Mateo County municipalities with complying with the municipal stormwater NPDES permit, including its latest incarnation as the MRP. Stormwater management-related activities of C/CAG and its various related committees and workgroups are described below.



C/CAG Board of Directors

Throughout FY 2023/24, the C/CAG Board of Directors received presentations, updates, and took actions on various stormwater-related issues. A significant role of the C/CAG Board of Directors regarding the Countywide Program is engaging in State legislation related to stormwater management and water quality regulations. Of note, during FY 2023/24 the C/CAG Board of Directors approved a SUPPORT letter for AB 1798 (Papan) Stormwater Runoff, which would require Caltrans and the State Water Resources Control Board, the Department of Toxic Substances Control, and the Department of Fish and Wildlife, to develop a programmatic environmental review process to prevent toxic compounds generated from vehicle tires from entering salmon and steelhead trout bearing waters. Though this bill failed to pass both houses, this action represents C/CAG's legislative policy approach to supporting cost-effective and streamlined water

¹NPDES Permit No. CAS612008 (Order No. R2-2022-0018) dated May 11, 2022. The MRP has a five-year term: effective July 1, 2022 and expires June 30, 2027.

quality programs. All C/CAG Board of Directors meeting agenda materials and minutes are available at www.ccag.ca.gov/board-of-directors):

Program Director and Stormwater Program Specialist

C/CAG's Program Director oversees the overall Countywide Program, serving as staff to the C/CAG Board and liaison among San Mateo County municipalities, technical consultants, committees, the Bay Area Municipal Stormwater Collaborative (BAMSC), the California Stormwater Quality Association (CASQA), and Regional Water Board staff. The Program Director represents San Mateo County municipalities at regional and statewide meetings and manages technical consultants that support programmatic activities. C/CAG's Stormwater Program Specialist (Specialist) supports the Program Director in implementing the Countywide Program. During FY 2023/24 the Specialist position was not filled.

Participation in Relevant Regional and Statewide Organizations and Activities

In addition to providing regular staff support, agenda reports, and presentations to the C/CAG Board and the Stormwater Committee, Countywide Program staff participated in the following activities during the FY 2022/23 reporting year:

- BAMSC: The Program Director participated in Steering Committee meetings and subcommittee meetings and workgroups focused on MRP implementation. Over the course of the fiscal year the Program Director also continued to represent stormwater programs on the San Francisco Bay Regional Monitoring Program (RMP) Emerging Contaminant Work Group (ECWG).
- CASQA: the Program Director attended and presented at the annual CASQA conference and participated in CASQA's Legislative Committee in December 2022, the Program Director was appointed by the CASQA Board of Directors to serve as a Co-chair of the Policy and Permitting Subcommittee.
- Green Infrastructure Leadership Exchange: The Program Director continued participating in the Green Infrastructure Leadership Exchange. The Program Director submitted a successful grant application with support from four partner agencies under the Regional Collaborative Grant program for \$70,000 to develop Part 2 of the Climate Resilience Resources Guide (CRRG) focused on developing decision support tools and resources to ensure greater success of implementing integrated GSI and climate resilience programs. The project was initiated in January 2023 and was completed by December 2023.
- Throughout FY 2022/23, the Program Director/Specialist gave a number of presentations, provided testimony, led efforts to obtain grant funding, and took various actions (e.g., submittal of comment letters) working with organizations such as CASQA, USEPA, the Bay Area Council, educational organizations, state and federal legislators, and Regional and State Water Boards on a variety of topics related to green infrastructure and stormwater management.

Grant-funded Project Activities

The Program Director/Specialist continued advancing several grant-funded projects in support of SMCWPPP's countywide planning and implementation efforts. In FY 2022/23 the Program Director worked with the participating BAMS Collaborative countywide stormwater programs partnering on the Watching Our Watersheds (WOW) Regional Trash Monitoring Program to submit a revised Work Plan to Region 9 USEPA to support the US EPA's funding recommendation to award the project \$3,366,000 under the Fiscal Year 2024 San Francisco Bay Water Quality Improvement Fund program, with \$3,366,000 in in-

kind matching contributions from the countywide program partners. The Program Director submitted the revised Work Plan in March and received a notice of award from the US EPA on June 28, 2023. In August 2023, C/CAG issued a Request for Proposal and selected a consultant team to implement the WOW project. The consultant team began implementing the project on December 15, 2023. In FY 2023/24 the consultant team completed tasks related to submittal of semi-annual progress reports to EPA, completion of the Stormwater Outfall Trash Monitoring Plan and the Quality Assurance Project Plan (QAPP), conducting trash monitoring during three separate storm events at ten locations, holding two Trash Technical Advisory Group meetings, completing the Draft Receiving Water Trash Monitoring Plan and QAPP, selecting six monitoring locations for FY 2024/25 sampling and completion of the Sampling and Analysis Plan (SAP) and QAPP for the Single-Use Plastic Source Control Ordinance Effectiveness Evaluation Project.

The Program Director worked with a group of regional partners in San Mateo County to submit a successful grant application under the Integrated Climate Adaptation and Resilience Program administered by the Governor's Office of Planning and Research for an Adaptation Planning Grant Program grant of \$649,648 to develop the San Mateo County OneWatershed Climate Resilience Framework and Community-Led Plan. This project will convene regional stakeholders and partners within San Mateo County to develop a community-based planning framework supportive of identifying and prioritizing new and planned green stormwater infrastructure projects for climate resilience, community adaptive capacity and environmental and water quality benefits. The project will develop a framework in collaboration with project partners and a community led OneWatershed climate resilience plan in the San Bruno Creek Watershed as a pilot study. The project will support additional policy and project concept development as well as the prioritization framework and methodology for addressing shared risk to climate change impacts for water infrastructure in the county. C/CAG received the notice of award on June 8, 2023 and the grant agreement was executed in October 2023. The Technical Advisory Committee and Equity Priority Community Group (EPC Workgroup) met twice during this fiscal year focusing on the project goals, community engagement and development of the OneWatershed Framework risk-based assessment methodology. The San Bruno Climate Change Community, which is a community centered advisory group focusing on the development of the pilot San Bruno Creek OneWatershed Climate Resilience Plan, will meet monthly during the project.

Under the Fiscal Year 2022/23 National Defense Authorization Act with Congresswoman Jackie Speier's leadership, C/CAG secured \$2.4 million in a Member Directed Funding Request to fund planning and design for the San Bruno Regional Stormwater Capture Project at I-280/I-380. The project, which was originally envisioned through a concept design as part of C/CAG's Countywide Stormwater Resource Plan, would manage an estimated 226 acre-feet of stormwater annually from 942 acres in the San Bruno Creek Watershed via a storm drain diversion into a large subsurface retention basin underneath the existing Caltrans maintenance yard at the interchange. The project is projected to provide full infiltration of captured stormwater into an actively used underlying groundwater basin (Westside Groundwater Basin) and would also provide some relief on the downstream storm drain system during wet weather.

Under the Fiscal Year 2023/24 Federal Appropriations Budget, the Program Director worked with C/CAG to secure \$850,000 in federal funding via the U.S. Department of Transportation Community Project Grant Program to fund the proposed Sustainable Streets Design Pilot in San Mateo County. The pilot design project will support the implementation of up three sustainable streets projects identified and conceptualized in the 2021 Countywide Sustainable Streets Master Plan (i.e., projects focused on underserved and at-risk communities in East Palo Alto, Colma, Daly City). The project sponsors are slated

to have funding agreements in place with Caltrans (the implementing agency) during Fiscal Year 2024/25.

Stormwater Committee

C/CAG's stormwater management-related decisions are generally made in consultation with the NPDES Stormwater Committee. At its November 2012 meeting, the C/CAG Board authorized reconvening this committee to include director-level appointees with decision-making authority for implementing stormwater management programs within San Mateo County municipalities in compliance with requirements in the MRP. The Committee meets on an approximate bimonthly basis (depending on need) on the third Thursday of the month, at the San Mateo County Transit District Office in San Carlos. The Stormwater Committee meetings are hybrid, meeting both in-person and by videoconference. Public notices for Committee meetings are posted in accordance with Brown Act requirements in C/CAG's designated kiosk located at 555 County Center, Redwood City.

The Stormwater Committee met 5 times during FY 2023/24 (September, November, January, March, and May) to assist with planning and organizing SMCWPPP's stormwater management activities including MRP compliance actions. Appendix 1 includes a table summarizing attendance at the Stormwater Committee meetings held during FY 2023/24. Details on Stormwater Committee meeting agendas, minutes, and presentations can be found on the Committee's [website](#).

The Stormwater Committee currently has three Ad-hoc Workgroups, including the longstanding MRP 3.0 Implementation Workgroup, the Funding and Financing Ad-hoc Workgroup, and the Workgroup Advancing Regional Projects (WARP), which was established at the February 2022 Stormwater Committee with the responsibilities to advance the development of a Regional Collaborative Program to support regional-scale stormwater management via multi-jurisdictional projects and programmatic implementation of distributed green infrastructure.

Technical Advisory Committee and Subcommittees

The Stormwater Committee provides direction to and receives feedback and recommendations from the Technical Advisory Committee (TAC). During FY 2012/13, the TAC transferred its former policy-related functions to the Stormwater Committee and transitioned to a quarterly workshop format. The new format allowed more detailed discussion of MRP compliance topics, including check-ins on what jurisdictions should be focused on in the coming quarter and what should have been accomplished and documented in the preceding quarter. The TAC has not met formally since 2013 and did not meet in FY 2023/24 but received regular emails from the Program Director and staff with updates on key permit compliance topics and occasional requests for feedback.

SMCWPPP has established various subcommittees and work groups to the TAC to help implement the different aspects of MRP, as shown on Figure 1-1. The subcommittees and work groups met regularly during FY 2023/24 and are further described below.

Flood and Sea Level Rise Resiliency District (OneShoreline)

[AB 825](#) (Mullin) became law on January 1, 2020, officially revamping the San Mateo County Flood Control District to become the San Mateo County Flood and Sea Level Rise Resiliency District (FSLRRD also known as "OneShoreline"). The FSLRRD is intended to address sea level rise, coastal erosion, flooding, and regional stormwater management. As such, assuming the FSLRRD can secure long-term, sustainable

funding during the startup period, it will likely play a key role in helping to design, build, and maintain regional stormwater facilities that will help achieve water quality goals in the MRP. The three-year funding commitment by the County and cities/towns (\$4.5 million over three years) was an important step forward for achieving integrated and climate resilient water management in San Mateo County. Since its inception, the FSLRRD has secured a number of grants to sustain its operations beyond the initial start-up period for the agency.

The C/CAG Board appointed the five city/town elected officials to the governing board. The County Board of Supervisors appointed the two supervisors. At its December 2021 meeting, the C/CAG Board approved the initial three appointments to the FSLRRD Board of Directors to fill the Coast, Central and At-large C/CAG-designated seats, which the authorizing legislation specified as the first round of staggered terms. The seven governing board members currently representing the different geographic areas in the county as of January 2023 are:

- North: Donna Colson, City of Burlingame
- Central: Adam Rak, City of San Carlos
- South: Lisa Gauthier, City of East Palo Alto
- Coast: Debra Ruddock, City of Half Moon Bay
- At-Large: Marie Chuang, Town of Hillsborough
- Coast Supervisor: Ray Mueller
- At-Large Supervisor: Dave Pine (Chair)

Len Materman (former San Francisquito Creek Joint Powers Authority Executive Director) was brought on as Chief Executive Officer in May 2020. Information on the FSLRRD can be found at its website, www.oneshoreline.org. The FSLRRD inherits the MRP permittee responsibilities of the prior Flood Control District, with those duties currently contracted to the County Department of Public Works for implementation and reporting.

ORGANIZATION OF REPORT

The remainder of this FY 2023/24 Annual Report is structured around the following major provisions of the reissued MRP:

- C.2. Municipal Operations
- C.3. New Development and Redevelopment
- C.4. Industrial and Commercial Site Controls
- C.5. Illicit Discharge Detection and Elimination
- C.6. Construction Site Control
- C.7. Public Information and Outreach
- C.8. Water Quality Monitoring
- C.9. Pesticides Toxicity Control
- C.10. Trash Load Reduction

- C.11. Mercury Controls
- C.12. PCBs Controls
- C.13. Copper Controls
- C.15. Exempted and Conditionally Exempted Discharges
- C.17. Discharges Associated with Unsheltered Homeless Populations
- C.20. Cost Reporting

The following sections briefly summarize how SMCWPPP assisted in FY 2023/24 in implementing the MRP for each of the above provisions.

C.2 Municipal Operations

The objective of MRP Provision C.2 is “to ensure development and implementation of appropriate Best Management Practices (BMPs) by all Permittees to control and reduce discharges of non-stormwater and stormwater runoff pollutants to storm drains and watercourses during operation, inspection, repair and maintenance activities of municipal facilities and infrastructure.” Most MRP-required Provision C.2 Municipal Operations tasks are implemented individually by each Permittee in San Mateo County. SMCWPPP helps agency staff to understand MRP requirements and develops various tools that assist agency staff to effectively plan, implement, and report on compliance activities. SMCWPPP’s assistance and the implementation of Municipal Operations tasks are coordinated through the SMCWPPP Public Works Municipal Maintenance Subcommittee.

SMCWPPP performs a number of tasks to assist San Mateo County Permittees with implementation of Provision C.2, with input and assistance provided by the Public Works Municipal Maintenance Subcommittee. FY 2023/24 accomplishments included the following:

- Held one Public Works Municipal Maintenance Subcommittee meeting in person;
- Updated a memo providing resources to meet MRP C.2.h. training requirements; and
- Updated a pesticide tracking template, in coordination with SMCWPPP’s Parks Maintenance and IPM Work Group, to assist San Mateo County Permittees to comply with pesticide tracking and reporting requirements in MRP Provision C.9.a.

C.3 New Development and Redevelopment

SMCWPPP assists San Mateo County Permittees with implementation of MRP Provision C.3, New Development and Redevelopment, including supporting green infrastructure planning requirements, and helping to advance cost-effective multi-benefit stormwater capture projects in San Mateo County. FY 2023/24 accomplishments included the following:

- Held two meetings of the New Development Subcommittee (NDS) to assist municipal agencies in San Mateo County to comply with MRP Provisions C.3 and C.6 (Construction Controls). Each meeting was well attended.
- Facilitated NDS meetings and provided technical assistance to help advance key elements of San Mateo County Permittee GI Plans, including updates to municipal ordinances, review of proposed project opportunities and concepts, and implementation of C.3 requirements.

- Continued coordination with the Work Plan Work Group of Permittee staff to review updates to guidance documents to reflect changes in MRP 3.0. The Work Group completed updates to fact sheets for roads/pavement projects and single-family home projects, the C3 Regulated Projects Guide and the C.3-C.6 Development Review Checklist to incorporate MRP 3.0 requirements and changes in regulated project thresholds.
- Continued to support municipal staff, consultants, and suppliers who have questions on the review and use of Biotreatment Soil Media (BSM) and the regional BSM specification.
- Conducted SMCWPPP’s annual C.3 training workshop on June 18, 2024. The number of Permittee staff in attendance (105) exceeded all previous years’ attendance at this workshop.
- Collected data from Permittees on newly installed treatment and hydromodification systems and submitted the compiled data to the San Mateo County Mosquito and Vector Control District and Water Board per provision C.3.h.iv.(2).
- Updated the Green Infrastructure Design Guide (GI Design Guide) for use by San Mateo County Permittees and external partners. The GI Design Guide now includes MRP 3.0 updates and other changes to reflect current guidance.
- Promoted the [Green Infrastructure](#), [Green Infrastructure Story Map](#), [Green Infrastructure Design Guide](#), and [Rain Garden](#) pages on the SMCWPPP website (flowstobay.org).
- Partnered with BAWSCA to promote the countywide rain barrel program. The supporting Rain Barrel outreach campaign received 118 rebate applications from residents for a total of 186 rain barrel installations that qualified for and received rebates. Over 3,460 rain barrels have been installed to-date in San Mateo County under the rebate program since its inception in 2014.
- Continued a bulk rain barrel distribution program in partnership with RainWater Solutions to provide county residents an opportunity to obtain high-quality, lower-cost rain barrels. The program distributed 297 barrels to 177 San Mateo County residents in 18 out of the County’s 20 incorporated jurisdictions, as well as residents in unincorporated areas (note – a portion though not all of the bulk order distributed barrels were also included in the BAWSCA rebate program, providing barrels to many residents at essentially no cost).
- Partnered with BAWSCA to promote the rain garden rebate as part of the Lawn Be Gone! Rebate. Launched a campaign to promote the rebate, which included rain garden-related posts on social media, the Flows to Bay website, and via e-newsletter. Results of the campaign include one rain garden rebate application pending approval, 963 pageviews on the campaign landing page, and 203 total downloads of materials on the campaign landing page, including the “Rebate Program Terms and Conditions” and “Rain Garden Rebate: Pre- and Post-Conversion Site Inspection Checklist”.
- Published a blog on March 4, 2024 titled “San Mateo County is Growing from “Gray” to “Green,” which featured rain gardens as a prime example of neighborhood-level green infrastructure. The blog was also included in several e-newsletters.
- Continued implementing the SMCWPPP Greening Schoolyards Program by supporting and facilitating the on-campus installation of four BlueBarrel and two Ivy rain barrels and conducting one classroom lecture to teach students about watersheds and rainwater capture.
- Participated in 11 public outreach and citizen involvement events. Of the 11 events, seven were focused on residential or community GI, including two events held by the County Office of

Education, one event held by the County Sustainability Department, one tabling event held by San Mateo County Mosquito and Vector Control District, one rain barrel delivery event, one in-person rain barrel installation workshop, and one middle school presentation. In total, these events reached 575 attendees.

- Conducted outreach to residents regarding GI via social media channels, including Facebook and Instagram.
- Continued to implement the [San Mateo County Stormwater Resource Plan](#) (SWRP) and Reasonable Assurance Analysis (RAA) by advancing projects on the parcel, street, and regional scale with Permittees and school districts. In FY 2023/24 C/CAG:
 - Continued implementation of the Sustainable Streets Master Plan.
 - Continued coordination of the Advancing Regional-scale Stormwater Management in San Mateo County project.
 - Continued to support regional GI projects in the cities of South San Francisco, Belmont, San Bruno, and Redwood City.
 - The San Carlos Resilient Schoolyards Report (available at [the project website](#)) was adopted by the San Carlos School District into its Facilities Master Plan and passed a bond measure to fund its implementation.
 - Updated the [San Mateo County GI Tracking and Mapping Tool](#).
 - Sought additional funding sources for regional-scale multi-benefit stormwater projects.
- In FY 2021/22, C/CAG developed a series of GI videos that link back to the core focus areas and scales for GI described in the GI Design Guide. The five-part video series includes an overall GI video and three focus videos showcasing GI in sustainable streets, schools, residential applications and effective GI maintenance practices. The videos were finalized and posted on the SMCWPPP website and the Flows To Bay YouTube channel (<https://www.youtube.com/@flowstobay>) in early FY 2023/24.
- Conducted regional collaboration and statewide promotion of GI:
 - Participated in the BAMSC Development Subcommittee (DS) and assisted with developing the agendas and arranging guest speakers for the DS meetings.
 - Participated in the Regional C.3 and development-related work groups.
 - Participated in the Bay Area Hydrology Model Work Group and successfully updated the model.
 - Made presentations at the CASQA quarterly seminar, the 2023 CASQA Conference, and the San Mateo County Office of Education's Climate Ready and Sustainable School Initiative.

C.4 Industrial and Commercial Site Controls

A primary goal of SMCWPPP's Commercial, Industrial and Illicit Discharge (CII) component is to assist San Mateo County Permittees in controlling the discharge of pollutants in stormwater from commercial and industrial businesses to the maximum extent practicable. San Mateo County Permittees are responsible for complying with various business inspection requirements under MRP Provision C.4. SMCWPPP's CII

component assists San Mateo County Permittee staff with understanding these MRP requirements and develops various related tools, templates, reporting forms, and other MRP compliance support materials. SMCWPPP's assistance with MRP Provision C.4 is coordinated through the CII Subcommittee, which met two times in FY 2023/24, with good participation by municipal staff.

During FY 2023/24, SMCWPPP performed a variety of tasks to assist San Mateo County Permittees with implementation of MRP Provision C.4, with input and assistance provided by the CII Subcommittee. Accomplishments included the following:

- Held two CII Subcommittee meetings;
- Updated the contact lists on How Your Business Can Prevent Stormwater Pollution booklet, Vehicle Service BMP Fact Sheet and Food Service BMP Fact Sheet;
- Held a Business and Illicit Discharge Stormwater Inspector Training Workshop; and
- Updated the business stormwater inspector contact list on the SMCWPPP website.

C.5 Illicit Discharge Detection and Elimination

Another important goal of SMCWPPP's CII component is to assist San Mateo County Permittees effectively prohibit the discharge of illicit, non-stormwater discharges to the municipal storm drain system. San Mateo County Permittees are responsible for controlling non-stormwater discharges prohibited by MRP Provision C.5. SMCWPPP's CII component assists San Mateo County Permittee staff with understanding these MRP requirements and develops various related tools, templates, reporting forms, and other MRP compliance support materials. SMCWPPP's assistance with MRP Provision C.5 is coordinated through the CII Subcommittee.

During FY 2023/24, SMCWPPP performed a number of tasks to assist San Mateo County Permittees with implementation of MRP Provision C.5, with input and assistance provided by the CII Subcommittee. Accomplishments included the following:

- Updated the table of stormwater enforcement actions against mobile businesses to share countywide with stormwater inspectors;
- Updated the Countywide mobile business inventory;
- Developed a Mobile Fueling BMP Fact Sheet;
- Updated the Illicit Discharge contact list on the SMCWPPP website; and
- Held a Business and Illicit Discharge Stormwater Inspector Training Workshop (see Section 4 for details).

C.6 Construction Site Control

This component of SMCWPPP assists San Mateo County municipalities in complying with MRP Provision C.6 (Construction Site Control). This assistance continued to be provided through the New Development Subcommittee (NDS). SMCWPPP's accomplishments during FY 2023/24 include the following tasks to assist San Mateo County municipalities with implementation of MRP Provision C.6:

- Provided updates to the NDS at meetings and through emails on the reissued State Construction Stormwater General Permit, and Qualified Stormwater Pollution Prevention Plan Developer (QSD) or Practitioner (QSP) training opportunities.

- Distributed the digital version of the Construction Site Inspection Form to the Subcommittee members.

C.7 Public Information and Outreach

The SMCWPPP PIP Subcommittee oversees the development of outreach and educational materials and guides the implementation of the PIP component of the program. The Subcommittee met once in FY 2022/23 with good participation by municipal staff. SMCWPPP's PIP accomplishments during FY 2022/23 included the following:

- Partnered with the Bay Area Water Supply Conservation Agency (BAWSCA) to promote the countywide rain barrel program in association with a bulk rain barrel distribution program. The supporting Rain Barrel outreach campaign received 118 rebate applications from residents for a total of 186 rain barrel installations. Over 3,460 rain barrels have been installed to date in San Mateo County under the rebate program.
- Partnered with BAWSCA to promote the rain garden rebate as part of the Lawn Be Gone! Rebate.
- Implemented rain garden-related posts on social media and the Flows to Bay website, published a blog featuring rain gardens as a prime example of neighborhood-level green infrastructure, and included the blog in several e-newsletters.
- The "How do rain gardens work?" video that was initially created in FY 2022/23 has continued to be shared with residents via social media, the website, and e-newsletters, and has now received 9.8K views on YouTube to date.
- Attendees of the May 2023 "Sustainably Stylish Rain Gardens" webinar received a second email newsletter during FY 2023/24 to maintain engagement with the participants regarding relevant actions involved in rain gardens and the relevant rebate discussed during the webinar.
- Shared educational website materials from LA Department of Water & Power (LADWP) via e-newsletter to help residents navigate the lawn conversion and rain garden process.
- Supported and continued to engage with the County Office of Education (COE) on advancing stormwater-related partnerships for facility improvements through the COE Sustainable and Climate Ready Schools Initiative.
- Promoted Coastal Cleanup Day, helping to gain 4,146 volunteers at over 30 countywide locations, resulting in 27,049 pounds of litter reported being picked up, and raising awareness of the event and the consequences of littering behaviors.
- Promoted the efforts of San Mateo County Environmental Health Services (EHS), including a campaign to reduce littering of cigarette butts, HHW Collection Program, Used Motor Oil/Filter Recycling Program, Fishing Smart in SF Bay, Safe Medicine Disposal, School Share Table Program, Healthy Nail Salon, and ReFuel Your Fun.
- Promoted Caltrans "Tarp Your Load" educational material regarding uncovered loads in English and Spanish.
- Maintained an Instagram following of +1.1K followers with 149 posts, reaching 3,509 unique users each month on average and enjoyed 248 interactions in posts with stormwater pollution

prevention messaging, ad campaigns and relevant partner shares.

- Maintained over 26.3K followers on Facebook, with a total post reach of 40,191 and 423 engagement interactions through stormwater pollution prevention messaging, event promotion, ad campaigns and relevant partner shares.
- Gained 362 new email subscribers and tracked an average open rate of 57%, an average 3.8% click rate, and an average 6.7% clicks per unique opens rate.
- Delivered seven e-newsletters: four targeted at our subscriber list, and reaching an average of 3,275 out of a list of 4,559 active, opt-in subscribers with topics covering local events, online webinars, and stormwater pollution prevention information and tips.
- Delivered three e-newsletters targeted to specific audiences including a) rain barrel purchaser prospects placed on a waitlist from last FY's (2022/23) Bulk Rain Barrel Program, b) attendees of the May 2023 Rain Garden Webinar as part of a drip-marketing campaign, and c) all participants of the FY 2023/24 Bulk Rain Barrel Program. These three e-newsletters performed at an average open rate of 78%, an average 32% click rate, and an average 39% clicks per unique opens rate.
- Recorded 98,729 annual visitors to the SMCWPPP website, which focuses on stormwater pollution prevention messaging and provided resources to residents, businesses, teachers, and city departments and municipalities.
- Participated in 11 public outreach and citizen involvement events with an estimated total of 4,828 engaged participants or attendees. These events, a mixture of virtual and in-person, provided educational content and solutions to interested residents, businesses and youth, and also offered participants the opportunity to have their questions answered.
- Participated in one countywide stormwater-focused campus presentation where we supported and facilitated one on-campus installation (for a total of four BlueBarrel and two Ivy rain barrels installed) and conducted a lecture to one middle school class about watersheds and rainwater capture.
- Performed point-of-purchase outreach with Our Water Our World materials to 12 hardware stores in San Mateo County while engaging residents and employees with eco-friendly alternatives to pesticides. To maximize our outreach efforts, two larger stores out of the 12 received a special tabling event from our local IPM expert. Between these two events, we educated 72 consumers and store employees about proper pesticide use, less toxic pesticide options, and effective alternatives to pesticides.
- Delivered outreach messaging to residents and pest control operators regarding eco-friendly alternatives to pesticides via business email, in SMCWPPP's newsletter, on the website, and social media channels.

C.8 Water Quality Monitoring

On behalf of its member agencies, SMCWPPP performs water quality monitoring activities in compliance with MRP Provision C.8. Per Provision C.8, a complete documentation of all water quality monitoring data collected from October 1, 2023 through September 30, 2024 (i.e., Water Year 2024 or WY 2024) will be presented in SMCWPPP's Urban Creeks Monitoring Report, which will be submitted to the Regional Water

Board by March 31, 2025. No additional reporting on Provision C.8 is provided in this FY 2023/24 Annual Report.

C.9 Pesticides Toxicity Control

During FY 2022/23, SMCWPPP performed a number of tasks to assist member agencies with implementation of Provision C.9, with input and assistance provided by the Parks Maintenance and IPM Work Group. Accomplishments included the following:

- Held one meeting of the Parks Maintenance and IPM Work Group.
- Conducted SMCWPPP's Annual Landscape IPM Training Workshop in June 2024.
- Continued coordinating with San Mateo County Agriculture / Weights and Measures.
- Updated the pesticides tracking template with the current two years of pesticide product data from the Department of Pesticide Regulation (DPR) website.
- Participated in relevant BAMSC and CASQA activities.
- Continued to maintain retail partnerships with 12 top-tier stores that sell pesticides/fertilizers within San Mateo County, (e.g., The Home Depot and Hassett Ace Hardware). Tasks included ordering materials, organizing outreach collateral, checking in with store managers, and providing outreach to residents.
- Conducted one in-person workshop that was broadcast to a virtual audience via Zoom in collaboration with the [San Mateo Arboretum Society](#) and led by an IPM Advocate in association with Our Water Our World to educate residents about less toxic alternatives to commercial pesticides and fertilizers.
- The IPM Advocate also conducted in-person outreach at popular hardware stores with two tabling events during the fiscal year.
- Sent a letter via mail to active-licensed pest control operators in San Mateo County in English and Spanish.

C.10 Trash Load Reduction

Provision C.10 of the MRP addresses stormwater discharges of trash. Permittees are required to implement a number of trash management and assessment tasks and ultimately demonstrate that trash loads have been reduced from their stormwater conveyance systems. SMCWPPP helps San Mateo County Permittee staff to understand trash load reduction requirements and develops various tools needed to effectively plan, implement, and report on compliance with C.10 requirements, with input and assistance provided by the SMCWPPP Trash Subcommittee. FY 2023/24 accomplishments included the following:

- Coordinated and facilitated four meetings of SMCWPPP's Trash Subcommittee.
- Assisted San Mateo County Permittees in delineating trash full capture treatment areas and managing trash full capture information in GIS (currently > 11,340 acres are treated by full capture systems in San Mateo County).
- Continued to implement SMCWPPP's Trash Assessment Strategy, including conducting 653 On-land Visual Trash Assessments (OVTAs) at 239 sites in FY 2023/24 and maintained the Countywide Program's Trash Load Reduction dashboard to allow San Mateo County Permittees to have access to load reduction estimates.

- Continued to provide guidance to San Mateo County Permittees on MRP operation and maintenance requirements and standard operating procedures for trash full capture systems.
- Assisted with developing San Mateo County Permittee Revised Trash Generation Maps using ArcGIS On-line Viewer;
- Held the Private Land Drainage Area (PLDA) Inspection Field Training on how to perform PLDA trash inspections on January 30, 2024, and demonstrated how to use the SMCWPPP standardized PLDA inspection data collection form.
- Identified remaining PLDAs that are less than 10,000 ft²;
- Developed additional tools for tracking, managing, and reporting PLDA inspection results;
- Assisted with developing suggested responses to Water Board staff comments and next steps to the BAMSC Trash Subcommittee regarding the use of bioretention facilities as trash full capture;
- Shared information on regional, state, and federal litter-related topics including foodware reuse and reduction programs, legislation, illegal dumping, and guidance documents.
- Coordinated with the SMCWPPP Public Information and Participation (PIP) Subcommittee on public outreach efforts targeting litter reduction.
- Coordinated with San Mateo County Permittee, Caltrans, and the Regional Water Board staff on the potential installation of a large trash full-capture system through a cooperative implementation agreement.
- Assisted San Mateo County Permittees that did not achieve the 90% trash load reduction benchmark by June 30, 2023 to address Water Board staff comments received on their Updated Long-term Trash Load Reduction Plans; and
- Assisted San Mateo County Permittees in developing information necessary for reporting trash load reductions with their FY 2023/24 Annual Reports.

C.11/12 Mercury/PCBs Controls

Provisions C.11 and C.12 of the MRP require Permittees to implement control programs to reduce the stormwater impacts of mercury and PCBs to San Francisco Bay (Bay). The Water Board has previously determined that stormwater discharges of these legacy pollutants have contributed to exceedances of water quality objectives and that associated beneficial uses of the Bay are not achieved. The Water Board has therefore adopted water quality attainment strategies called Total Maximum Daily Loads (TMDLs) that assign pollutant load reductions (through waste load allocations) to Bay Area municipal stormwater dischargers. Provisions C.11 and C.12 implement the urban runoff requirements of the mercury and PCBs TMDLs. The control programs and other actions that Provisions C.11 and C.12 require Permittees to implement are described below.

During FY 2023/24, Provisions C.11 and C.12 requirements were addressed primarily at three levels: directly by San Mateo County Permittees, at the countywide level via SMCWPPP, and/or at the regional level via BAMSC. The following sections describe FY 2023/24 accomplishments for each of the above control programs.

C.11/12.a Assess Mercury and PCBs Load Reductions from Stormwater

Provisions C.11/12.a require Permittees to implement an assessment methodology and data collection program to quantify PCBs loads reduced through implementation of all controls described in Provisions C.11/12. Loads reduced for green infrastructure (GI) projects will be evaluated using the model documented in SMCWPPP's *Pollutant Control Measure Implementation Plan and Reasonable Assurance Analysis* (RAA) that was developed during MRP 2.0 and submitted to the Water Board in September 2020. The RAA model will be updated as needed to add new GI projects implemented during MRP 3.0. For all other control measures identified in Provisions C.11/12 (i.e., source controls), the Water Board Executive Officer (EO) has approved for use during MRP 3.0 the accounting methodologies described in *BASMAA Source Control Load Reduction Accounting for Reasonable Assurance Analysis*. This document describes the calculation methodologies, data requirements, and model parameters used to quantify mercury and PCBs loads reduced for each type of control measure (except GI) identified in Provisions C.11/12. To comply with the detailed requirements in the permit for reporting on the mercury and PCBs control programs, San Mateo County Permittees have developed a *Mercury and PCBs Control Measures Report* that will be updated each year of the permit term. Version 2.0 of this report is included in Appendix 11. The report provides:

- Documentation to confirm that all control measures effectuated during the previous permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.
- Documentation to demonstrate the status of control measure implementation during MRP 3.0 to date (i.e., FY 2021/22 through FY 2023/24).

C.11/12.b Program for Source Property Identification and Abatement

Provisions C.11/12.b require San Mateo County Permittees to investigate, using both conventional sampling and laboratory analysis techniques, at least 1,411 acres of land areas during the MRP 3.0 permit term that likely contribute mercury and/or PCBs to MS4s. These investigations are focusing on land areas where industrial activities occurred prior to 1980 and continue today (i.e., old industrial land use areas that have not been redeveloped). For properties or land areas found to be contributing substantial amounts of mercury or PCBs or where high mercury or PCBs concentrations are found (generally areas with sediment concentrations greater than 0.5 mg/kg), Permittees will take actions to abate the mercury and PCBs sources into their MS4s or refer the properties to the Water Board for follow-up measures. Provisions C.11/12.b reporting requirements include reporting in each Annual Report on progress on the acreage of land areas investigated, including progress toward investigation of the 1,411 acres of old industrial land uses in San Mateo County.

During FY 2023/24, the Countywide Program (on behalf of San Mateo County Permittees) continued to investigate old industrial land areas in San Mateo County using similar methods to those implemented during previous permit terms. The source property investigation related efforts conducted by SMCWPPP on behalf of San Mateo County Permittees during FY 2023/24 included the following actions:

- Desktop Evaluation and Field Reconnaissance to Identify MS4 Sediment and Stormwater Runoff Sample Stations.
- Screening-level Stormwater Sampling. One stormwater runoff sample was collected from catchment WMA 1005 in Millbrae, San Bruno and Unincorporated County. This sampling screened approximately 43 acres of old industrial parcels.

- MS4 Sediment Sampling. During FY 2023/24, SMCWPPP collected 36 sediment samples in six primarily old industrial catchments in South San Francisco and San Bruno.
- Reporting. The chemical analysis results for the sediment samples collected in WY 2023 were reported in SMCWPPP's WY 2023 Urban Creeks Monitoring Report (UCMR, SMCWPPP 2023). The chemical analysis results for the stormwater and sediment samples collected in WY 2024 will be reported in SMCWPPP's WY 2024 UCMR, which is due March 31, 2025.
- Planning for Ongoing Source Investigations. During FY 2023/24, the Countywide Program developed a source investigation workplan that outlines the source investigation steps and proposed timeline for achieving the MRP 3.0 requirement to investigate 1,411 old industrial land use acres in San Mateo County during the MRP 3.0 permit term.

Additional documentation demonstrating implementation of the Source Property Investigation and Abatement control program in San Mateo County is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11).

C.11/12.c Program for Control Measure Implementation in Old Industrial Areas

San Mateo County Permittees are required, during the permit term, to implement or cause to be implemented control measures to address 445 acres of old industrial land use areas at 70% control measure efficiency, or through accounting for the mass reduction of 19 g/yr of mercury and 81 g/yr of PCBs. Reporting requirements include the following:

- Submit plans and schedules for implementing controls in old industrial areas by March 31, 2023.
- In each Annual Report, Permittees are required to submit an account of the controls implemented consistent with the plan submitted in March 2023, and any modifications thereto. Reporting shall include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.

During FY 2023/24, Countywide Program staff worked with San Mateo County Permittee staff to revise the Old Industrial Area *Pollutant Control Measure Plan (OICMP)* to address comments from the Regional Water Board and satisfy the requirements of Provisions C.11/12.c. The revised OICMP describes the existing, new, and enhanced PCBs and mercury control measures identified to date for implementation by San Mateo County Permittees during MRP 3.0. Additional documentation demonstrating implementation of the OICMP in San Mateo County during FY 2023/24 is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11).

C.11.d Mercury Collection and Recycling Implemented throughout the Region

MRP Permittees are required to promote, facilitate, and/or participate in collection and recycling of mercury containing consumer products, devices, and equipment to increase effectiveness and public participation. During FY 2023/24, San Mateo County municipalities continued to participate in San Mateo County Health Department's Household Hazardous Waste (HHW) Program and Very Small Quantity Generator Business Collection (VSQG) Program. Many San Mateo County municipal agencies promote the availability of the HHW Program and VSQG Program on their agency websites. The estimated mass of mercury collected in FY 2023/24 via these programs is 0.3 kg. It should be noted that these mass estimates are not directly comparable to pollutant load reductions in stormwater runoff discharges.

C.12.d Program for Controlling PCBs from Bridges and Overpasses

MRP Permittees are required to implement a Caltrans specification to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing materials in bridge roadway expansion joints. The Caltrans specification is currently under development through a proposed requirement in Caltrans stormwater permit. Six months after availability of the specification, Permittees must begin to implement or cause to be implemented the Caltrans specification during applicable replacement activities that are under the direction of the Permittee. Although the Caltrans specification is not yet released, during FY 2023/24, San Mateo County Permittees continued to track the development of the Caltrans specification through participation in BAMSC meetings and inquiries to Caltrans and Water Board staff.

C.12.e Program for Controlling PCBs from Electrical Utilities

MRP Permittees are required to develop and implement a program to manage PCBs in oil-filled electrical equipment (OFEE) for municipally owned electrical utilities in the MRP program area and collaborate with the Water Board to determine PCBs loadings in OFEE from non-municipally owned electrical utilities. San Mateo County does not have any municipally owned electrical utilities. As of the end of FY 2023/24, the Water Board had not transmitted information from non-municipally owned electric utilities to the Permittees.

C.11.e/C.12.f Plan and Implement Green Stormwater Infrastructure to Reduce Mercury and PCBs Loads

MRP Permittees are required to implement GI projects consistent with the requirements in Provision C.3.j during the permit term. As noted earlier, additional reporting on GI and other stormwater treatment control projects that were completed through the end of FY 2023/24 is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11).

C.12.g Manage PCBs-Containing Materials and Wastes During Building Demolition Activities

MRP Permittees are required to continue to implement the protocols developed during the previous permit term for managing PCB-containing materials and wastes during building demolition so that PCBs do not enter MS4s. As of July 1, 2023, Permittees were also required to enhance their protocols to include new notification requirements and construction site controls for applicable structures containing building materials with PCBs > 50 mg/kg. Appendix 11 of this Annual Report includes a technical memorandum prepared by Countywide Program Staff that addresses FY 2023/24 reporting requirements in Provision C.12.g (*Program for Management of PCBs during Building Demolition – Data Summary through FY 2023/24 for San Mateo County MRP Permittees*).

C.11.f/C.12.h Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations

MRP 3.0 requires that Permittees evaluate the effectiveness of all mercury and PCBs control measures in the 2020 *Mercury and PCBs Control Measure Plan and Reasonable Assurance Analysis (RAA)* that was submitted during the previous permit term and update the RAA as necessary. Permittees are also required to prepare detailed implementation plans for all control measures to be implemented and inform permit requirements during the subsequent permit term. Permittees must identify all specific control measures to be implemented, the intensity of control measure implementation, and the estimated load reduction benefit from control measures implemented during the subsequent permit term. Permittees must submit

the updated plan and schedule no later than March 31, 2026. During FY 2023/24, San Mateo County Permittees continued to track all control measures implemented to reduce mercury and PCBs stormwater loads in the County. All available data on control measures implemented to reduce mercury and PCBs during FY 2022/23 are provided in the *Mercury and PCBs Control Measure Report* (Appendix 11).

C.11.g/C.12.i Fate and Transport Study of Mercury and PCBs: Urban Runoff Impact on San Francisco Bay Margins

Provisions C.11.g and C.12.i require Permittees to conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of mercury and PCBs discharged from urban runoff to San Francisco Bay margin areas. The studies should focus on near-shore areas contaminated with mercury and PCBs from historical activity and the expected trajectory of recovery as sources from local watersheds are reduced. Permittees are addressing Provisions C.11.g and C.12.i through a multi-year project by the San Francisco Bay (Bay) Regional Monitoring Program (RMP) to identify, model, and investigate embayments along the Bay shoreline designated “Priority Margin Units” (PMUs). RMP documents available at links shown in Section 11/12 of this Annual Report provide information that addresses this MRP requirement by describing relevant RMP studies and their anticipated schedules. During FY 2023/24, Countywide Program representatives participated in the RMP PCBs Work Group’s ongoing oversight of this project.

C.11.h/C.12.j Implement a Risk Reduction Program

Provisions C.11.h and C.12.j require Permittees to conduct an ongoing risk reduction program to address public health impacts of mercury and PCBs in San Francisco Bay fish. The fish risk reduction program is required to include actions to reduce actual and potential health risks in those people and communities most likely to consume San Francisco Bay-caught fish, such as subsistence fishers and their families. Permittees are required to report on the status of the risk reduction program in each of their Annual Reports, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish. SMCWPPP is assisting San Mateo County municipalities comply with the risk reduction program requirements by coordinating with and reporting on the Fish Smart program conducted by San Mateo County Environmental Health Services (EHS). During FY 2023/24, EHS continued to conduct a variety of activities that target at-risk populations (e.g., subsistence fisherman) via the Fish Smart program. Section 11/12 of this Annual Report summarizes accomplishments of the Fish Smart program during FY 2023/24.

C.13 Copper Controls

Provision C.13 of the MRP addresses copper control measures identified in the San Francisco Bay Basin Water Quality Control Plan (commonly referred to as the Basin Plan) that the Regional Water Board has deemed necessary to support copper site-specific objectives in San Francisco Bay. SMCWPPP's accomplishments during FY 2023/24 include the following tasks to assist San Mateo County Permittees with implementation of Provision C.13:

- Provided information through the SMCWPPP website, via a SMCWPPP factsheet entitled *Requirements for Architectural Copper: Protect water quality during installation, cleaning, treating, and washing!* which targets suppliers and installers of copper materials
- Provided information through the SMCWPPP website, via a fact sheet entitled *Best Management Practices for Pools, Hot Tubs, and Fountain Water Discharges*, and social media posts related to managing discharges from pools, spas and fountains that includes information on avoiding the use of copper-based algaecides.

- Provided information through the SMCWPPP website and at the June 13, 2023 SMCWPPP Business and Illicit Discharge Stormwater Inspector Training Workshop on ensuring through routine industrial facility inspections that proper BMPs are in place at industrial facilities likely to use copper or have sources of copper.

C.15 Exempted and Conditionally Exempted Discharges

The objective of MRP Provision C.15, Exempted and Conditionally Exempted Discharges, is to exempt unpolluted non-stormwater discharges from the MRP's general non-stormwater discharge prohibition (Provision A.1) and to conditionally exempt non-stormwater discharges that are potential sources of pollutants. SMCWPPP helps municipal staff understand the MRP's requirements and makes various MRP compliance support materials available for their use. SMCWPPP's PIP component conducts selected activities to assist San Mateo County Permittees comply with outreach requirements in Provision C.15.b.iv (Individual Residential Car Washing Discharge), C.15.b.v (Swimming Pool, Hot Tub, Spa and Fountain Water), and Provision C.15.b.vi (Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering).

SMCWPPP performs a variety of activities to assist San Mateo County Permittees with implementation of Provision C.15. SMCWPPP's FY 2023/24 accomplishments included the following:

- Provided in-kind support to the BAMSC project of regional benefit to jointly develop a Regional Firefighting Discharges Report and hold two Regional Work Group meetings in March and June 2024 as part of the efforts to identify and evaluate opportunities to reduce the impacts of discharges to the MS4 associate with emergency firefighting activity (Provision C.15.b.iii).
- Continued outreach efforts through social media posts to encourage residents to use car washes rather than washing their cars at home.
- Continued conducting social media outreach to residents to educate them on the hazards of dumping their used wash waters down storm drains and related BMPs.
- Using a BMP fact sheet for swimming pools, hot tubs, spas, and fountain water discharges, promoted these types of BMPs through social media posts.
- Continued conducting outreach to San Mateo County residents to support and promote eco-friendly alternatives to toxic pesticides and to help avoid pollutants in stormwater discharges. The promotion took place on social media, the one IPM webinar conducted in association with San Mateo Arboretum Society, and the SMCWPPP newsletter. Additional messaging was provided through SMCWPPP's point-of-purchase program, where OWOW materials were distributed that educate residents about eco-friendly pesticide alternatives, and via two tabling event at local hardware stores.
- Continued promoting planting of drought tolerant, native vegetation through online media channels, including social media and the SMCWPPP newsletter. Messaging focused on the environmental benefits of planting native plants, including their tolerance to drought.
- Continued to promote water-conservation tips via social media and wrote two blogs that feature water conservation.

C.17 Discharges Associated with Unsheltered Homeless Populations

The objective of MRP Provision C.17, Discharges Associated with Unsheltered Homeless Populations, is to identify and ensure the implementation of appropriate control measures to address non-stormwater

discharges into MS4s associated with unsheltered homeless populations, including discharges from areas where unsheltered people congregate. SMCWPPP helps municipal staff understand the MRP's requirements, makes various MRP compliance support materials available for their use and participates, on behalf of its members, in regional groups (e.g., BAMSC Work Group). A SMCWPPP C.17 Work Group was formed in FY 2022/23 to facilitate and coordinate providing this assistance to the member agencies. The *Regional BMP Report for Addressing Non-stormwater Discharges Associated with Unsheltered Homeless Populations* was submitted in the SMCWPPP FY 2022/23 Annual Report. The SMCWPPP Work Group did not meet in FY 2023/24. In FY 2023/24 the San Mateo County Human Services Agency (HAS) conducted the 2024 One Day Homeless Count on January 25, 2024. SMCWPPP will work with HAS to obtain the data available to update Permittee maps submitted in FY 2022/23.

C.20 Cost Reporting

Provision C.20, Cost Reporting, is a new provision in MRP 3.0 which requires Permittees to: 1) prepare and submit a fiscal analysis of the capital and operation and maintenance costs incurred to comply with MRP requirements; 2) jointly develop, by June 30, 2023, a cost reporting framework and methodology to perform the fiscal analysis; and 3) submit their fiscal analyses annually starting with the 2025 Annual Report. In FY 2022/23, SMCWPPP collaborated with other Phase I countywide programs through the Bay Area Municipal Stormwater Collaborative (BAMSC) to complete a Bay Area Cost Reporting Framework and Guidance Manual in compliance with Provision C.20.

The project resulted in the development of a Bay Area Cost Reporting Framework (Excel-based cost reporting tool with tabs for each MRP provision) and a Guidance Manual providing instructions and guidance for Permittees using the Framework to conduct their fiscal analyses and assumptions made for each provision and cost category. The final Framework and Guidance Manual were submitted to the Water Board on June 26, 2023.

SMCWPPP's accomplishments during FY 2023/24 included the following tasks to assist San Mateo County Permittees with implementation of Provision C.20:

- The BAMSC Regional Cost Reporting Work Group (Regional Work Group), which includes members from SMCWPPP, held one meeting in August 2023 to collectively review the Water Board's comments on the final Bay Area Cost Reporting Framework and Guidance Manual and discuss State Water Board coordination related to the statewide policy for cost reporting.
- In March 2024, the Permittees completed revisions and submitted a revised Final Framework and Guidance Manual, to which the Water Board provided conditional approval on June 26, 2024.

C.21 Asset Management

Provision C.21, Asset Management, is a new provision introduced with MRP 3.0 which requires Permittees to develop and implement an Asset Management Plan to ensure the satisfactory condition of publicly-owned hard assets constructed during this and previous permit terms. Hard assets are defined in the MRP as structural controls that serve a water quality function (e.g., bioretention cells, pervious pavement systems, and full trash capture devices). Provision C.21.b.i requires Permittees to develop an Asset Management Plan that includes asset category descriptions, an inventory of assets, an Asset Management O&M Plan for prioritizing and scheduling O&M activities, and recommendations for a reporting strategy. Provision C.21.c requires Permittees to submit their Asset Management Plans with

the 2025 Annual Reports and then to report on implementation efforts annually starting with the 2026 Annual Reports.

SMCWPPP's accomplishments during FY 2023/24 included the following tasks to assist San Mateo County Permittees with implementation of Provision C.21:

- SMCWPPP provided in-kind support to a BAMSC Asset Management Work Group that formed in FY 2023/24 for permittees to collaborate and share resources. The BAMSC Work Group discussed approaches to asset management and opportunities for regional consistency.
- In FY 2023/24, SMCWPPP formed an Asset Management Work Group to help guide SMCWPPP Permittees with asset management planning. The Work Group met twice during the FY and participants discussed asset management background, requirements, approaches, and data management at the countywide and local levels.
- To support Permittee development of asset management plans, SMCWPPP developed an Asset Management Template Outline for which Work Group members reviewed and provided feedback. The Outline was further developed into a draft Asset Management Plan Template with a framework for creating local asset management programs.

SECTION 1

INTRODUCTION

BACKGROUND

This FY 2023/24 Annual Report was developed in compliance with the reissued National Pollutant Discharge Elimination System (NPDES) Municipal Regional Permit (referred to as the MRP)¹ for stormwater runoff discharges from San Mateo County and certain other San Francisco Bay Area communities. It summarizes stormwater management activities implemented by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP or Countywide Program) in FY 2023/24. SMCWPPP's activities benefit 22 municipal agencies in San Mateo County: 15 cities, five towns, the County of San Mateo, and the San Mateo County Flood and Sea Level Rise Resiliency District (FSLRRD, also referred to as OneShoreline). Each of these agencies also separately submits an individual Annual Report to the San Francisco Bay Regional Water Quality Control Board (Water Board) focusing on that agency's stormwater management activities during FY 2023/24.



The organizational structure of SMCWPPP is shown in Figure 1-1, at the end of this section. SMCWPPP is a program of the City/County Association of Governments (C/CAG) of San Mateo County. C/CAG is a Joint Powers Authority (JPA) that addresses issues of regional importance to San Mateo County jurisdictions such as congestion management and water quality. The C/CAG Board of Directors is comprised of a local elected city council representative from each city and town in San Mateo County, a member of the County Board of Supervisors, and representatives from the transit district and transportation authority. A 1993 amendment to the JPA Agreement made C/CAG responsible for assisting San Mateo County municipalities with complying with the municipal stormwater NPDES permit, including its latest incarnation as the MRP. Stormwater management-related activities of C/CAG and its various related committees and workgroups are described below.

C/CAG Board of Directors

Throughout FY 2023/24, the C/CAG Board of Directors received presentations, updates, and took actions on various stormwater-related issues. A significant role of the C/CAG Board of Directors regarding the Countywide Program is engaging in State legislation related to stormwater management and water quality regulations. Of note, during FY 2023/24 the C/CAG Board of Directors approved a SUPPORT letter for AB 1798 (Papan) Stormwater Runoff, which would require Caltrans and the State Water Resources Control Board, the Department of Toxic Substances Control, and the Department of Fish and Wildlife, to develop a programmatic environmental review process to prevent toxic compounds generated from vehicle tires

¹NPDES Permit No. CAS612008 (Order No. R2-2022-0018) dated May 11, 2022. The MRP has a five-year term: effective July 1, 2022 and expires June 30, 2027.

from entering salmon and steelhead trout bearing waters. Though this bill failed to pass both houses, this action represents C/CAG's legislative policy approach to supporting cost-effective and streamlined water quality programs. All C/CAG Board of Directors meeting agenda materials and minutes are available at www.ccag.ca.gov/board-of-directors.

Program Director and Stormwater Program Specialist

C/CAG's Program Director oversees the overall Countywide Program, serving as staff to the C/CAG Board and liaison among San Mateo County municipalities, technical consultants, committees, the Bay Area Municipal Stormwater Collaborative (BAMSC), the California Stormwater Quality Association (CASQA), and Regional Water Board staff. The Program Director represents San Mateo County municipalities at regional and statewide meetings and manages technical consultants that support programmatic activities. C/CAG's Stormwater Program Specialist (Specialist) supports the Program Director in implementing the Countywide Program. During FY 2023/24 the Specialist position was not filled.

Participation in Relevant Regional and Statewide Organizations and Activities

In addition to providing regular staff support, agenda reports, and presentations to the C/CAG Board and the Stormwater Committee, Countywide Program staff participated in the following activities during the FY 2023/24 reporting year:

- BAMSC: The Bay Area Municipal Stormwater Collaborative (BAMSC) is an informal collaborative of Phase I and Phase II Municipal Stormwater Programs. The Program Director participated in Steering Committee meetings and subcommittee meetings and workgroups focused on MRP implementation. Over the course of the fiscal year the Program Director also continued to represent stormwater programs on the San Francisco Bay Regional Monitoring Program (RMP) Emerging Contaminant Work Group (ECWG).
- CASQA: The Program Director attended and presented at the 2023 annual CASQA conference and participated in CASQA's Legislative Committee. In December 2022, the Program Director was appointed by the CASQA Board of Directors to serve as a Co-Chair of the Policy and Permitting Subcommittee and continued in that position through FY 2023/24.
- Green Infrastructure Leadership Exchange: The Program Director continued participating in the Green Infrastructure Leadership Exchange. The Program Director submitted a successful grant application with support from four partner agencies under the Regional Collaborative Grant program for \$70,000 to develop Part 2 of the Climate Resilience Resources Guide (CRRG) focused on developing decision support tools and resources to ensure greater success of implementing integrated GSI and climate resilience programs. The project was initiated in January 2023 and was completed by December 2023.
- FY 2023/24 Presentations/Actions/Activities by the Program Director:
 - Participated in a panel at the 2023 CASQA Conference, September 12, 2023, on the topic of "GSI Implementation in the San Francisco Bay Area – Challenges and Opportunities for a more Collaborative, Integrated, and Innovative Future", featuring a discussion of the challenges and opportunities for effective GSI implementation in the Bay Area, especially in terms of site constraints, resource limitations and regulatory barriers. Panelists also included Amanda Booth (City of San Pablo), Pam Boyle Rodriguez (City of Palo Alto), and Shannan Young (City of Dublin).

- Presented at the 2023 CASQA Conference, September 12, 2023, on “[The Climate Resilience Resources Guide – Tools for Planning and Implementing Climate-Resilient Green Stormwater Infrastructure](#),” with a focus on creating actionable decision-support tools for integrating climate resilience into local GSI policy, planning and implementation. The Guide also includes technical information on supporting GSI-resilience integration as well as a foundation in ensuring climate resilience-based GSI programs are rooted in community and equity considerations.
- Participated in a panel at the 2023 CASQA Conference, September 12, 2023, on the topic of “Equity Approaches in Climate Resilience and Nature-Based Solutions Planning in the Bay Area,” featuring a discussion of how to change the norms within local government and stormwater programs to address historical inequities and promote an equitable and inclusive process for community engagement in stormwater management. Panelists also included Rosey Jencks (Brown and Caldwell), Emily Corwin (Solano Stormwater Alliance) and Cade Cannedy (Climate Resilient Communities).
- Presented at the 2023 CASQA Conference, September 12, 2023, on “Building Adaption Capacity through Resilient Schoolyards in San Mateo County”, with a focus on the completion of a district schoolyard greening planning project in the San Carlos School District. The presentation summarized the participatory planning process developed as part of this California Resilience Challenge Grant funded project and the collaborative leadership roles of the Countywide Program, school sites and district staff in creating campus-wide Resilient Schoolyard Concept Plans for three sites. The presentation also provided context for how the school district plans to implement the concept plans through the recently updated facilities master plan and successful bond measure.
- Submitted a comment letter on the MRP Permit Amendment Tentative Order on behalf of SMCWPPP on August 21, 2023.
- Submitted a comment letter on the State Water Board’s Draft Water Quality Control Policy for Standardized Cost Reporting in Municipal Separate Storm Sewer System (MS4) Permits on October 3, 2023.
- Continued engaging the Workgroup Advancing Regional Projects (WARP), an ad-hoc workgroup of the Stormwater Committee, and completed the September 2023 Interim MOU-based Regional Collaborative Program Summary Report.
- Presented at the PCBs Symposium #3 of the University of Washington Puget Sound Institute’s Cross Contaminant Working Group on November 1, 2023, with a focus on updates regarding the Bay Area MRP requirements for managing PCBs during building demolition.
- With two C/CAG Board members, met with congressional representatives in Washington DC in March 2024 to discuss this fiscal year’s NOAA grant application and other transportation-related funding requests.
- Presented on schoolyard greening/GSI partnership opportunities at the Community Partners Day of the Environmental Solutionary Teacher Fellowship on July 19, 2024, hosted by the San Mateo County Office of Education, and participated on a panel at the Climate Ready Schools Symposium on April 30, 2024. The panel addressed “Student-Centered Systems Change” to support school districts and school site staff on effective

ways to integrate GSI with schoolyard greening and climate resilience initiatives.

Grant-funded Project Activities

The Program Director continued advancing several grant-funded projects in support of SMCWPPP's countywide planning and implementation efforts.

Watching Our Watersheds

In FY 2022/23, the Program Director worked with the participating BAMS Collaborative countywide stormwater programs partnering on the Watching Our Watersheds (WOW) Regional Trash Monitoring Program to submit a revised Work Plan to Region 9 US EPA to support the US EPA's funding recommendation to award the project \$3,366,000 under the Fiscal Year 2024 San Francisco Bay Water Quality Improvement Fund program, with \$3,366,000 in in-kind matching contributions from the countywide program partners. The Program Director submitted the revised Work Plan in March 2023 and received a notice of award from the US EPA on June 28, 2023. In August 2023, C/CAG issued a Request for Proposal and selected a consultant team to implement the WOW project. The consultant team began implementing the project on December 15, 2023.

The consultant team completed the following match and grant funded tasks and deliverables in FY 2023/24:

- Developed and submitted the first semi-annual progress report to EPA on April 30, 2024.
- Trash Outfall monitoring:
 - Completed Final Stormwater Outfall Trash Monitoring Plan and Quality Assurance Project Plan. Both plans were submitted to the Regional Water Board on July 31, 2023.
 - Conducted trash monitoring during three separate storm events at ten locations² between November 2023 and March 2024.
- Held two meetings of the Trash Technical Advisory Group (TAG) (March 8 and May 15, 2024). The TAG provided input on the development of the Receiving Water Trash Monitoring Plan and Quality Assurance Project Plan.
- Receiving Water monitoring:
 - Completed Draft Receiving Water Trash Monitoring Plan and Quality Assurance Project Plan (QAPP). Both plans will be submitted to the Regional Water Board on July 31, 2024.
 - Developed receiving water monitoring methods and approach and selected sites for monitoring. Monitoring will be conducted at six locations during three separate storm events starting October 1, 2024.
 - Completed Sampling and Analysis Plan (SAP) and QAPP for the Single-Use Plastic Source Control Ordinance Effectiveness Evaluation Project. Monitoring for the source control project will occur in San Mateo County beginning in late spring 2025.

OneWatershed Climate Resilience Framework and Community-Led Plan

The Program Director worked with a group of regional partners in San Mateo County to submit a successful grant application under the Integrated Climate Adaptation and Resilience Program

² Trash monitoring location for Solano County is co-located with a Low Impact Development (LID) feature, which had construction delays through end of the trash outfall monitoring period. Thus, no trash data was collected at the Solano site during WY 2024.

administered by the Governor's Office of Planning and Research for an Adaptation Planning Grant Program grant of \$649,648 to develop the San Mateo County OneWatershed Climate Resilience Framework and Community-Led Plan. This project will convene regional stakeholders and partners within San Mateo County to develop a community-based planning framework supportive of identifying and prioritizing new and planned green stormwater infrastructure projects for climate resilience, community adaptive capacity and environmental and water quality benefits. The project will develop a framework in collaboration with project partners and a community-led OneWatershed climate resilience plan in the San Bruno Creek Watershed as a pilot study. The project will support additional policy and project concept development as well as the prioritization framework and methodology for addressing shared risk to climate change impacts for water infrastructure in the county. C/CAG received the notice of award on June 8, 2023 and the grant agreement was executed in October 2023. The contract with Geosyntec as the consultant for the OneWatershed Framework Project was executed and kick-off meeting was held December 18, 2023. The Technical Advisory Committee and Equity Priority Community Group (EPC Workgroup) met twice during this fiscal year focusing on the project goals, community engagement and development of the OneWatershed Framework risk-based assessment methodology (the TAC met March 20 and May 5 and the EPC Workgroup met April 3 and May 12, 2024). The San Bruno Climate Change Community, which is a community centered advisory group focusing on the development of the pilot San Bruno Creek OneWatershed Climate Resilience Plan, will meet monthly during the project. The project will conclude in January 2026.

San Bruno I-280/I-380 Regional Stormwater Capture Project Member Directed Funding Request (U.S. EPA STAG)

Under the Fiscal Year 2022/23 National Defense Authorization Act with Congresswoman Jackie Speier's leadership, C/CAG secured \$2.4 million in a Member Directed Funding Request to fund planning and design for the San Bruno Regional Stormwater Capture Project at I-280/I-380. The project, which was originally envisioned through a concept design as part of C/CAG's Countywide Stormwater Resource Plan, would manage an estimated 226 acre-feet of stormwater annually from 942 acres in the San Bruno Creek Watershed via a storm drain diversion into a large subsurface retention basin underneath the existing Caltrans maintenance yard at the interchange. The project is projected to provide full infiltration of captured stormwater into an actively used underlying groundwater basin (Westside Groundwater Basin) and would also provide some relief on the downstream storm drain system during wet weather.

Sustainable Streets Design Pilot Program Grant (U.S. DOT) Community Project Grant Program

Under the Fiscal Year 2023/24 Federal Appropriations Budget, the Program Director worked with C/CAG to secure \$850,000 in federal funding via the U.S. Department of Transportation Community Project Grant Program to fund the proposed Sustainable Streets Design Pilot in San Mateo County. The pilot design project will support the implementation of up three sustainable streets projects identified and conceptualized in the 2021 Countywide Sustainable Streets Master Plan (i.e., projects focused on underserved and at-risk communities in East Palo Alto, Colma, Daly City). The project sponsors are slated to have funding agreements in place with Caltrans (the implementing agency) during Fiscal Year 2024/25.

Stormwater Committee

C/CAG's stormwater management-related decisions are generally made in consultation with the NPDES Stormwater Committee. At its November 2012 meeting, the C/CAG Board authorized reconvening this committee to include director-level appointees with decision-making authority for implementing stormwater management programs within San Mateo County municipalities in compliance with requirements in the MRP. The Committee meets on an approximate bimonthly basis (depending on need)

on the third Thursday of the month, at the San Mateo County Transit District Office in San Carlos. The Stormwater Committee meetings are hybrid, meeting both in-person and by videoconference. Public notices for Committee meetings are posted in accordance with Brown Act requirements in C/CAG's designated kiosk located at 555 County Center, Redwood City.

The Stormwater Committee met 5 times during FY 2023/24 (September, November, January, March, and May) to assist with planning and organizing SMCWPPP's stormwater management activities including MRP compliance actions. Appendix 1 includes a table summarizing attendance at the Stormwater Committee meetings held during FY 2023/24. Details on Stormwater Committee meeting agendas, minutes, and presentations can be found on the Committee's [website](#).

The Stormwater Committee currently has three Ad-hoc Workgroups, including the longstanding MRP Implementation Workgroup, the Funding and Financing Ad-hoc Workgroup, and the Workgroup Advancing Regional Projects (WARP), which was established at the February 2022 Stormwater Committee with the responsibilities to advance the development of a Regional Collaborative Program to support regional-scale stormwater management via multi-jurisdictional projects and programmatic implementation of distributed green infrastructure.

The below sections describe the Stormwater Committee's mission statement, membership criteria, and roles and responsibilities.

Mission Statement

The Stormwater Committee provides policy and technical advice and recommendations to the C/CAG Board of Directors and direction to technical committees (described below) on all matters relating to stormwater management and compliance with associated regulatory mandates from the State and Regional Water Boards.

Membership

The Stormwater Committee is comprised of one director-level (or equivalent) representative (and one optional alternate) from each San Mateo County municipality, with decision-making authority and primary responsibility for implementing stormwater management programs within their jurisdictions, and one non-voting executive management representative (and one optional alternate) from the Regional Water Board staff, all appointed by title or by name by the C/CAG Board. There are no term limits and members may be removed and replaced as needed.

Roles & Responsibilities

The role of the Stormwater Committee is to provide policy and technical advice, recommendations to the C/CAG Board, and direction to stormwater technical committees on matters related to stormwater management and associated regulatory requirements. While the Stormwater Committee may consider any item reasonably related to stormwater and associated regulatory requirements, the following issues are the primary focus of the Stormwater Committee:

- Review and provide recommendations for SMCWPPP's annual budget as part of the overall C/CAG budget approval process;

- Approve staff recommendations to submit countywide and regional compliance documents on behalf of C/CAG's member agencies for activities performed via C/CAG through SMCWPPP or the BAMSC Steering Committee;
- Convey relevant program and compliance information and direction to appropriate staff and departments within their agencies;
- Form ad-hoc work groups to address stormwater-related issues on an as-needed basis (e.g., permit reissuance);
- Discuss and provide policy recommendations on stormwater issues, such as:
 - Funding stormwater compliance activities at the local and countywide level;
 - Unfunded mandate test claims;
 - Permit appeals and litigation;
 - Reissuance of the MRP;
 - Permit requirements, especially those related to new and redevelopment, GI, monitoring, and pollutants of concern, including trash, mercury, PCBs, pesticides and emerging contaminants;
 - Training and technical support needs for municipal staffs; and
 - Legislation and statewide policy issues impacting San Mateo County municipalities.

Technical Advisory Committee and Subcommittees

The Stormwater Committee provides direction to and receives feedback and recommendations from the Technical Advisory Committee (TAC). During FY 2012/13, the TAC transferred its former policy-related functions to the Stormwater Committee and transitioned to a quarterly workshop format. The new format allowed more detailed discussion of MRP compliance topics, including check-ins on what jurisdictions should be focused on in the coming quarter and what should have been accomplished and documented in the preceding quarter. The TAC has not met formally since 2013 and did not meet in FY 2023/24 but received regular emails from the Program Director and staff with updates on key permit compliance topics and occasional requests for feedback.

SMCWPPP has established various subcommittees and work groups to the TAC to help implement the different aspects of MRP, as shown on Figure 1-1, at the end of this section. The subcommittees and work groups met regularly during FY 2023/24 and are discussed further in the remaining sections of this report.

Flood and Sea Level Rise Resiliency District (OneShoreline)

[AB 825](#) (Mullin) became law on January 1, 2020, officially revamping the San Mateo County Flood Control District to become the San Mateo County Flood and Sea Level Rise Resiliency District (FSLRRD also known as OneShoreline). The FSLRRD is intended to address sea level rise, coastal erosion, flooding, and regional stormwater management. As such, assuming the FSLRRD can secure long-term, sustainable funding during the startup period, it will likely play a key role in helping to design, build, and maintain regional stormwater facilities that will help achieve water quality goals in the MRP. The three-year funding commitment by the County and cities/towns (\$4.5 million over three years) was an important step forward for achieving

integrated and climate resilient water management in San Mateo County. Since its inception, the FSLRRD has secured a number of grants to sustain its operations beyond the initial start-up period for the agency.

The C/CAG Board appointed the five city/town elected officials to the governing board. The County Board of Supervisors appointed the two supervisors. At its December 2021 meeting, the C/CAG Board approved the initial three appointments to the FSLRRD Board of Directors to fill the Coast, Central and At-large C/CAG-designated seats, which the authorizing legislation specified as the first round of staggered terms. The seven governing board members currently representing the different geographic areas in the county as of June 2024 are:

- North: Donna Colson, City of Burlingame
- Central: Adam Rak, City of San Carlos
- South: Lisa Gauthier, City of East Palo Alto
- Coast: Debra Ruddock, City of Half Moon Bay
- At-Large: Marie Chuang, Town of Hillsborough
- Coast Supervisor: Ray Mueller
- At-Large Supervisor: Dave Pine (Chair)

Len Materman (former San Francisquito Creek Joint Powers Authority Executive Director) was brought on as Chief Executive Officer in May 2020. Information on the FSLRRD can be found at its website, www.oneshoreline.org. The FSLRRD inherits the MRP permittee responsibilities of the prior Flood Control District, with those duties currently contracted to the County Department of Public Works for implementation and reporting. The FSLRRD was included as a replacement permittee under the MRP with its reissuance in 2022.

ORGANIZATION OF REPORT

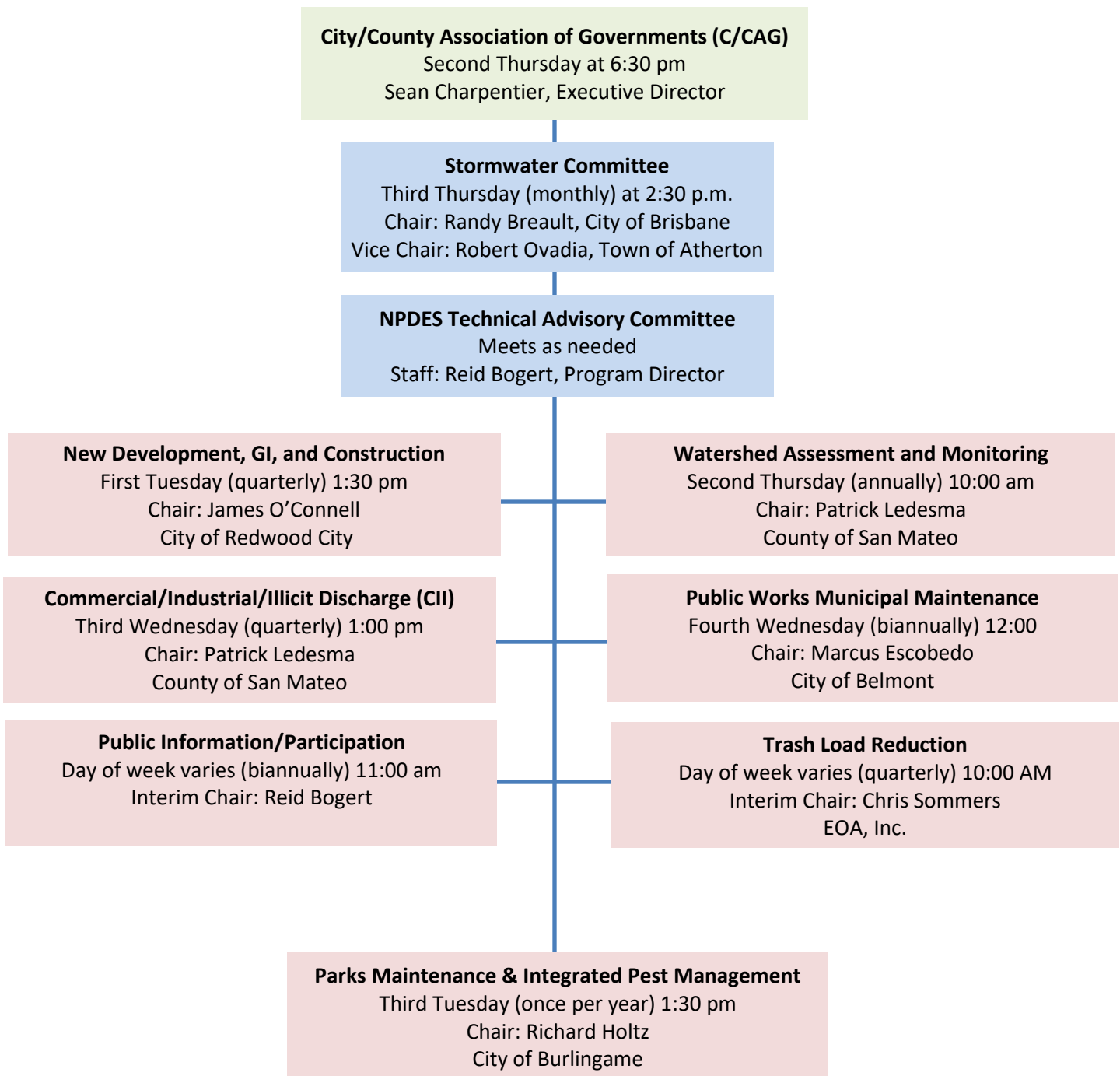
The remainder of this FY 2023/24 Annual Report is structured around the following major provisions of the reissued MRP:

- C.2. Municipal Operations
- C.3. New Development and Redevelopment
- C.4. Industrial and Commercial Site Controls
- C.5. Illicit Discharge Detection and Elimination
- C.6. Construction Site Control
- C.7. Public Information and Outreach
- C.8. Water Quality Monitoring
- C.9. Pesticides Toxicity Control
- C.10. Trash Load Reduction
- C.11. Mercury Controls
- C.12. PCBs Controls

- C.13. Copper Controls
- C.15. Exempted and Conditionally Exempted Discharges
- C.17. Discharges Associated with Unsheltered Homeless Populations
- C.20. Cost Reporting

The following sections of this report summarize how SMCWPPP assisted San Mateo County Permittees with implementing the MRP in FY 2023/24 for each of the above provisions. Each section includes three sub-sections: 1) Introduction, 2) Implementation of MRP Actions, and 3) Future Actions.

Figure 1-1. Organizational Structure and FY 2023/24 Meeting Schedule.



SECTION 2

C.2 MUNICIPAL OPERATIONS

INTRODUCTION

The objective of MRP Provision C.2 is “to ensure development and implementation of appropriate Best Management Practices (BMPs) by all Permittees to control and reduce discharges of non-stormwater and stormwater runoff pollutants to storm drains and watercourses during operation, inspection, repair, and maintenance activities of municipal facilities and infrastructure.”

Most MRP-required Provision C.2 Municipal Operations tasks are implemented individually by each Permittee in San Mateo County. The Countywide Program helps agency staff to understand MRP requirements and develops various tools that assist agency staff to effectively plan, implement, and report on compliance activities. SMCWPPP’s assistance and the implementation of Municipal Operations tasks are coordinated through the SMCWPPP Public Works Municipal Maintenance Subcommittee.

IMPLEMENTATION OF MRP PROVISIONS

SMCWPPP performs a number of tasks to assist San Mateo County Permittees with implementation of Provision C.2, with input and assistance provided by the Public Works Municipal Maintenance Subcommittee. FY 2023/24 accomplishments included the following:

- Held one Public Works Municipal Maintenance Subcommittee meeting in person;
- Updated a memo providing resources to meet MRP C.2.h. training requirements; and
- Updated a pesticide tracking template, in coordination with SMCWPPP’s Parks Maintenance and IPM Work Group, to assist San Mateo County Permittees to comply with pesticide tracking and reporting requirements in MRP Provision C.9.a.

More information on each of these accomplishments is provided below.

Public Works Municipal Maintenance Subcommittee

The Public Works Municipal Maintenance Subcommittee provides the opportunity for sharing information about municipal operations related MRP requirements and methods for achieving compliance. The meetings provided a forum to share experiences with implementing MRP provisions and applying associated BMPs related to activities such as:

- Street and road repair maintenance activities;
- Sidewalk/plaza maintenance and pavement washing;
- Graffiti removal;
- Corporation yard activities; and

- Stormwater pump station monitoring and inspections.

Marcus Escobedo from the City of Belmont continued to chair the Subcommittee during FY 2023/24. The Subcommittee met once last fiscal year. The Subcommittee met in March 2024, with good participation by municipal staff, as shown by the attendance list (Appendix 2).

Countywide Program staff also facilitated discussions at the meeting about a variety of pertinent topics, including mosquito and vector control coordination, trash full capture device maintenance, training, responding to discharges of human waste from unsheltered homeless populations, BMP documentation and annual reporting.

Program Materials

Since the first version of the MRP was adopted in 2009, SMCWPPP has developed a variety of materials to assist municipal maintenance agency staff with implementing Provision C.2. These materials are all available on the SMCWPPP website (flowstobay.org) and continue to be useful tools that assist agency staff to achieve permit compliance. The materials are described below.

In FY 2009/10, SMCWPPP developed a Stormwater Pollution Prevention Plan (SWPPP) template for use by San Mateo County Permittees in tailoring, updating, or creating SWPPPs for their corporation yards, satellite facilities, and maintenance facilities. In FY 2010/11, SMCWPPP prepared the “Municipal Corporation Yard Inspection Form.” This form provides detailed checklists for the types of BMPs recommended in the corporation yard SWPPP template. In FY 2022/23, the SWPPP template and corporation yard inspection form template were updated to address MRP 3.0 requirements.

During FY 2010/11, SMCWPPP developed the “Stormwater Pump Station Dry Season DO Monitoring and Inspection Form” to assist San Mateo County Permittees in developing a systematic and efficient way to collect dissolved oxygen (DO) monitoring and inspection information. The following twelve agencies in San Mateo County operate stormwater pump stations: Cities of Belmont, Burlingame, East Palo Alto, Foster City, Menlo Park, Millbrae, Pacifica, Redwood City, San Carlos, San Mateo, and South San Francisco, and the San Mateo County FCSLRD.

In FY 2015/16, SMCWPPP developed a trash full capture device inspection and cleaning field form template, a Small Full Capture Device O&M Standard Operating Procedure (SOP), a Hydrodynamic Separator O&M SOP, and a Trash Full-Capture Device O&M Verification Program Template and Guidance document. These materials were developed in coordination with the Trash Subcommittee to help municipal staff comply with new requirements in MRP Provision C.10.b.i., Full Trash Capture Systems. These requirements include certifying that trash full capture systems are operated and maintained to meet full trash capture system requirements and keeping associated maintenance records.

In FY 2016/17, SMCWPPP developed a trash full capture device inspection and cleaning data tracking Microsoft Excel template to assist with tracking and reporting requirements in MRP Provision C.10.b.i. Also in FY 2016/17, SMCWPPP developed a template in Excel to assist with pesticide tracking and reporting requirements in MRP Provision C.9.a. The pesticides tracking template utilizes a lookup list of pesticides and active ingredients compiled from data tables available on the Department of Pesticide Regulation (DPR) website. In coordination with the Parks Maintenance and IPM Work Group, the template was updated during FY 2023/24 with the current two years of pesticide product data from the DPR website.

In FY 2022/23 Countywide Program staff drafted a Proposed Workplan to meet MRP C.2.h. training requirements. The memo included links to available training materials such as videos, CASQA BMP fact sheets, Caltrans BMP fact sheets, BASMAA materials and other reference materials that could be used for in-house training. This memo was updated in FY 2023/24.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees understand and comply with requirements in MRP Provision C.2 include the following:

- Continue holding one Public Works Municipal Maintenance Subcommittee meeting;
- Update tracking templates and guidance materials, as needed;
- Assist with developing maintenance training materials and/or workshops; and
- Coordinate with SMCWPPP's New Development Subcommittee to provide guidance on GI maintenance and related training materials.

SECTION 3

C.3 NEW DEVELOPMENT AND REDEVELOPMENT

INTRODUCTION

This section describes SMCWPPP’s activities to assist municipal agencies in San Mateo County to comply with MRP Provision C.3, New Development and Redevelopment. SMCWPPP continued to provide compliance assistance with MRP Provision C.3 (and Provision C.6 Construction Site Controls – see Section 6) through the New Development Subcommittee (NDS). SMCWPPP also obtained input and direction from agency representatives through the NDS. During FY 2023/24, James O’Connell with the City of Redwood City continued to chair the NDS. The NDS Work Plan Work Group (Work Group) continued to assist with the implementation of FY 2023/24 NDS Work Plan tasks.

This section also describes C/CAG’s efforts to: help advance the most cost-effective and maximum benefit stormwater projects in San Mateo County, in support of the Green Infrastructure (GI) Plan requirements in the MRP; promote GI through the County, region, and State; and participate in regional collaborative efforts.

IMPLEMENTATION OF MRP PROVISIONS

SMCWPPP's accomplishments during FY 2023/24 include the following tasks to assist San Mateo County municipalities with implementation of Provision C.3:

- Held two meetings of the NDS to assist municipal agencies in San Mateo County to comply with MRP Provisions C.3 (New Development and Redevelopment) and C.6 (Construction Controls). Each meeting was well attended (see Appendix 3 for the FY 2023/24 NDS attendance record). SMCWPPP’s facilitation of the NDS meetings and related review of work outside of the meetings allowed SMCWPPP to help advance key elements of San Mateo County Permittee GI Plans, including updates to municipal ordinances, review of proposed project opportunities and concepts, and implementation of C.3 requirements.
- Completed updates to the Green Infrastructure Design Guide (GI Design Guide), version 2.0, and finalized the updated C.3 Regulated Projects Guide and the C.3-C.6 Development Review Checklist that incorporate MRP 3.0 requirements and changes in regulated project thresholds.
- Participated in the BAMSC Development Subcommittee (DS) and assisted with developing the agendas and arranging guest speakers for the DS meetings.
- Continued promoting the GI Design Guide for use by San Mateo County Permittees and external partners. The GI Design Guide includes broad guidance on the design and implementation of various green stormwater infrastructure treatment measures and typical details and standard specifications for numerous GI design options and settings.

- Conducted a variety of GI outreach activities, including promoting rain barrel and rain garden rebate programs and bulk order rain barrel distribution program, publishing blog posts and newsletter articles, creating a series of educational videos on green stormwater infrastructure in different settings, and posting on social media. SMCWPPP outreach staff also attended classroom presentations and participated in efforts to engage schools via programs led by the San Mateo County Office of Education, including acting as a community partner in last year's [Sustainable Watersheds](#) teacher fellowship program and the new [Sustainable and Climate Ready Schools Initiative Partnership](#) in the water focus area.
- Supported local and regional implementation of GI through four presentations and panels featuring green stormwater infrastructure planning and climate adaptation presented by Countywide Program staff at the 2023 California Stormwater Quality Association (CASQA) Annual Conference in September 2023, and presentations and engagement with numerous other organizations and partners across the county and region. C/CAG's Program Director also continued proactively seeking additional sources of funding to support green stormwater infrastructure implementation and additional planning efforts for a variety of GI project types and scales within the county, through State and federal funding.

Additional details about the above accomplishments are provided below.

C.3 Implementation and Outreach Products

With the assistance of the NDS and the Work Group, SMCWPPP developed, updated and/or assisted with the following C.3 implementation and outreach products:

- GI Design Guide (Version 2.0)
- C.3 Regulated Projects Guide (Version 2.0) (finalized and posted)
- MRP 3.0 C.3-C.6 Development Review Checklist (in Excel and PDF-Form versions)
- MRP 3.0 Small Projects Checklist (in PDF-Form version)
- Construction, Reconstruction, and Maintenance of Roads and Other Pavement Fact Sheet (finalized and posted)
- Information for Single-Family Home Project Applicants Fact Sheet (finalized and posted)

New Development (C.3) Workshop

With the assistance of the NDS, SMCWPPP conducted the FY 2023/24 C.3 Workshop on June 18, 2024. The workshop was held via Zoom and was attended by a record number of 105 municipal staff and consultants, including GI professionals from the private sector. The workshop included the following elements:

- Presentation on roadway project requirements and guidance;
- Presentation on best maintenance practices for bioretention measures;
- Presentation on lessons learned for improved performance in bioretention design and construction; and
- Case studies of projects from the Cities of Half Moon Bay and Redwood City.

The agenda, attendance record, and evaluation summary are included in Appendix 3 and the presentations are posted on the SMCWPPP [website](#).

Operation and Maintenance of Stormwater Treatment Systems

SMCWPPP continued to collect data from Permittees on newly installed treatment and hydromodification systems for submittal to the San Mateo County Mosquito and Vector Control District and Regional Water Board per Provision C.3.h.iv.(2). The data were submitted to the Mosquito and Vector Control District on September 15, 2024. A copy of the communication and the list of treatment and hydromodification systems installed in FY 2023/24 is included in Appendix 3.

Green Infrastructure Outreach

During FY 2023/24, SMCWPPP continued performing a variety of GI-related outreach, including the following efforts:

- Promoted the [Green Infrastructure](#), [Green Infrastructure Story Map](#), [Green Infrastructure Design Guide](#), Rain Barrels & Rebate Program, and [Rain Garden](#) pages on the SMCWPPP website (flowstobay.org).
- Partnered with BAWSCA to promote the countywide rain barrel program. The supporting Rain Barrel outreach campaign received 118 rebate applications from residents for a total of 186 rain barrel installations that qualified for and received rebates. Over 3,460 rain barrels have been installed to-date in San Mateo County under the rebate program since its inception in 2014.
- Continued a bulk rain barrel distribution program in partnership with RainWater Solutions to provide county residents an opportunity to obtain high-quality, lower-cost rain barrels. The program distributed 297 barrels to 177 San Mateo County residents in 18 out of the County's 20 incorporated jurisdictions, as well as residents in unincorporated areas (note – a portion though not all of the bulk order distributed barrels were also included in the BAWSCA rebate program, providing barrels to many residents at essentially no cost).
- Partnered with BAWSCA to promote the rain garden rebate as part of the Lawn Be Gone! Rebate. Launched a campaign to promote the rebate, which included rain garden-related posts on social media, the Flows to Bay website, and via e-newsletter. Results of the campaign include one rain garden rebate application pending approval, 963 pageviews on the campaign landing page, and 203 total downloads of materials on the campaign landing page, including the "Rebate Program Terms and Conditions" and "Rain Garden Rebate: Pre- and Post-Conversion Site Inspection Checklist".
- Published a blog on March 4, 2024 titled "San Mateo County is Growing from "Gray" to "Green," which featured rain gardens as a prime example of neighborhood-level green infrastructure. The blog was also included in several e-newsletters.
- Continued to promote an educational animated video on rain gardens and their benefits (that was created in FY 2022/23) on the website, social media and in our e-newsletters. The video has now received 9.8K views on YouTube to date.
- Sent six (of seven total) e-newsletters to an average of 1,791 recipients of our active, opt-in community newsletter subscriber list with topics featuring GI, such as water-wise gardening tips and rain barrel/rain garden installation guidance and resources. Gained 362 new email subscribers and had an average open rate of 67%.

- Attendees of the May 2023 “Sustainably Stylish Rain Gardens” webinar received a second email newsletter during FY 2023/24 to maintain engagement with the participants regarding relevant actions involved in rain gardens and the relevant rebate discussed during the webinar.
- Published a five-part video series focusing on GI at different scales in San Mateo County – including Overall GI, Sustainable Streets, Schools, Homes and GI Maintenance – to several pages on the website. These included the Green Infrastructure, Data & Resources, Outreach Materials, Sustainable Streets Master Plan, Safe Routes to School, Schoolyard Greening & Rainwater Resilient Schools, Sustainable and Climate Ready Schools Partnership Network, School Site Improvements, and Rain Gardens & Rebate Program pages (September 2023). The videos were also uploaded as a series in a new 'Green Infrastructure' playlist on the Flows To Bay Youtube (September 2023) and shared in a green infrastructure blog (See San Mateo County is Growing from “Gray” to “Green”) (March 2024).
- Continued to promote the San Mateo County Office of Education’s Teacher Fellowship on an as-needed basis, with a focus on Sustainable Watersheds and advancing green stormwater infrastructure curriculum and project implementation at schools.
- Continued implementing the SMCWPPP Greening Schoolyards Program by supporting and facilitating the on-campus installation of four BlueBarrel and two Ivy rain barrels and conducting one classroom lecture to teach students about watersheds and rainwater capture.
- Participated in 11 public outreach and citizen involvement events. Of the 11 events, seven were focused on residential or community GI, including two events held by the County Office of Education, one event held by the County Sustainability Department, one tabling event held by San Mateo County Mosquito and Vector Control District, , one rain barrel delivery event, one in-person rain barrel installation workshop, and one middle school presentation. In total, these events reached 575 attendees.
- Promoted outreach messaging to residents regarding GI via social media channels, including Facebook and Instagram. For example: “What is Green Infrastructure? 🌿 Green infrastructure is a term that’s used broadly to describe a more cost-effective and resilient approach to managing wet weather and pollutants associated with runoff. Click the link in our bio to understand how green infrastructure can be effectively used throughout San Mateo County to build a stronger, more prepared community”.

San Mateo Countywide Stormwater Resource Plan

In response to the State’s legislative mandate for Stormwater Resource Plans in order to compete for voter-approved bond funds, C/CAG worked with its member agencies to develop the [San Mateo County Stormwater Resource Plan](#) in 2017. The plan utilized various metrics to prioritize opportunities for stormwater capture at varying scales. Since that time, San Mateo County Permittees have been working to advance implementation of stormwater management measures at three primary scales:

- 1) the parcel scale, where only the rain falling on a site is managed (primarily new and redevelopment projects);
- 2) the street scale, where stormwater runoff from public roadways and sidewalks and adjacent parcel run-on to the streets is managed via green street features; and
- 3) the regional scale, where runoff from watershed or drainage areas is managed in large, centralized facilities.

In FY 2023/24, C/CAG staff and its member agencies have advanced the original outputs from the Stormwater Resources Plan by advancing partnerships with schools on pilot projects and schoolyard greening concept plans; building on its existing rain barrel rebate program partnership; advocating for funding on Sustainable Streets Projects (at the federal, state, and local level, as well as through grants); exploring ways to jointly fund operation and maintenance of the completed Orange Memorial Park Regional Project and advancing new opportunities for regional stormwater capture through C/CAG's and the County's efforts on the Regional Collaborative Program Framework White Paper and Interim MOU-Based Regional Collaborate Program Report.

Reasonable Assurance Analysis (RAA) for Green Infrastructure and Regional Collaborative Program Development

As required under Provisions C.11 and C.12 (of the prior permit "MRP 2.0"), C/CAG developed a countywide pollutant transport/hydrology model coupled with GI scenario modeling to provide Permittees with quantitative details on how much GI would be needed spatially to meet the MRP 2.0 goal for PCBs load reduction via GI by 2040. The RAA helped Permittees recognize:

- 1) The rate of GI implementation via new and redevelopment is generally outside the control of municipalities, but the extent of projects subject to stormwater requirements is governed by both MRP and local requirements;
- 2) Meeting GI and stormwater treatment targets on a countywide basis instead of proportionally within each jurisdiction can result in overall cost savings by implementing projects where it makes most sense;
- 3) Regional-scale projects, while costly, can be very cost effective in terms of the overall volume managed vs. equivalent levels of small-scale distributed systems, especially with regard to operations and maintenance. These larger scale projects can also provide other significant benefits such as flood risk reduction and water supply augmentation, and are often competitive multi-benefit/multi-jurisdictional projects for state and federal grant programs; and
- 4) Green street implementation is likely to be the most impactful on local Permittee resources, both for capital expenses and long-term operations and maintenance given that it is most likely to be funded by the limited local allocations of transportation dollars and result in many distributed bioretention facilities requiring ongoing maintenance. This contrasts with parcel-scale projects funded primarily by private developers or regional-scale projects likely to be funded by significant state or federal grants due to the integrated, multi-benefit nature.

As a result, C/CAG and its member agencies began looking at options to meet water quality and treatment requirements while reducing the financial burden of green streets on local agencies when evaluating approaches for meeting long-term water quality goals. Subsequent efforts to support GI implementation across scales and for maximum benefit included: the development of the Sustainable Streets Master Plan (completed in winter 2021); the Advancing Regional-scale Stormwater Management in San Mateo County project (completed in winter 2022); the Resilient San Carlos Schoolyards Project (completed spring 2023); updating the San Mateo County GI Tracking and Mapping Tool to address missing or inaccurate data and improve mapping capabilities; seeking additional funding sources for regional-scale multi-benefit stormwater projects; and submitting a successful grant application for \$649,648 under the Governor's Office of Planning and Research's Integrated Climate Adaptation and Resilience Program to develop the San Mateo County OneWatershed Climate Resilience Framework and Community-led Plan to support

additional prioritization of new and planned multi-benefit stormwater capture projects from the perspective of addressing shared risk to water infrastructure in the face of climate change.

Regional-Scale Stormwater Management and Countywide Collaboration

Since the Stormwater Resource Plan, SMCWPPP has helped shepherd several regional projects through initial planning, concept design and engineering (as well as construction in the case of South San Francisco's Orange Memorial Park project). The following summarizes the status of the current regional projects underway in San Mateo County.

South San Francisco (Orange Memorial Park)

This project, which is the first of its kind in the Bay Area, was completed in June 2022 and will provide water quality improvements to help meet the MRP requirements related to mercury, PCBs, and trash, and new requirements in the reissued permit (MRP 3.0) for retrofit of quantified amounts of green infrastructure not already defined as a Regulated Project pursuant to Provision C.3.b. The project includes an instream diversion and pre-treatment structure (trash screen and sediment removal chamber) in the upper end of the Colma Creek flood control channel within Orange Memorial Park. Pretreated water gravity drains to an underground stormwater reservoir where it is stored until either infiltrating or being further treated for direct non-potable reuse (i.e., irrigation for the park and nearby trails, as well as a source of water for street sweeping and urban trees). When storage capacity is exceeded, treated overflow is discharged back into the channel. Originally conceptualized in the Stormwater Resource Plan, the project will divert approximately 16% of the annual drainage from approximately 6,500 acres of land primarily in the City of South San Francisco, Town of Colma, the City of Daly City, and a portion of unincorporated San Mateo County and the City of Pacifica, of which 9% will be treated to remove trash/sediment before being returned to the channel, 6% infiltrated into the Westside groundwater basin (approximately 240 acre-feet/year), and 1% treated and used onsite and in nearby linear parks for irrigation purposes (approximately 45 acre-feet/year). The project is anticipated to capture 100 tons of sediment, 10 grams of PCBs, and 30 grams of mercury, annually. The project was funded through a \$15.5M Cooperative Implementation Agreement with Caltrans to help satisfy its pollutant load reduction requirements, focusing on trash load reductions. C/CAG has supported conversations with the City of South San Francisco, OneShoreline, and other agencies in the drainage area of this project to identify feasible and desired strategies to cost share the ongoing operations and maintenance needs, and OneShoreline and the City of South San Francisco have included operational funding for the project in a two-year Maintenance Agreement designated for the Colma Creek channel. These discussions have been supported by the Work Group Advancing Regional Projects and the outcomes will be referenced in the updated Interim MOU-based Regional Collaborative Program Summary Report.

Belmont Project (Twin Pines Park)

The Belmont project was originally conceptualized in the Stormwater Resource Plan as a small-scale regional facility capturing runoff from a small neighborhood. Since then, the Cities of Belmont and San Carlos and the County of San Mateo, through its Flood Resilience Program (now OneShoreline), jointly developed a Watershed Management Plan for Belmont Creek. In this plan, the Twin Pines Park project was increased in scale to be comparable to the other regional projects (~20 acre-feet of storage capacity), with an underground detention/retention gallery conceptualized beneath the Twin Pines Park parking lot. In early 2020 C/CAG, in conjunction with the California Natural Resources Agency, allocated \$913,000 of a \$2.94M State budget allocation to advance regional stormwater projects in San Mateo County to the Belmont project for preliminary design and environmental review. At the same time, OneShoreline was also successful in applying for Department of Water Resources grant for \$1M to restore Belmont Creek

within Twin Pines Park as a joint project. In FY 2021/22, the City of Belmont issued a joint Request for Proposals for design and construction services on both projects concurrently, leveraging an additional ~\$6M grant from the California Natural Resources Agency received in early 2022. The City has contracted for design and construction services on both the stormwater capture and the creek restoration project. The City has secured partial funding for construction of the stormwater capture project through the CNRA grant and local matching funds from the City, the City of San Carlos and the County of San Mateo, and is actively seeking additional grant funds to secure full construction funding. To support the construction phase of the project (Phase 1 of 2), the City secured a member-directed spending request of \$1.1M from Kevin Mullins' office in FY 2023/24.

San Bruno Project (I-280/380 Interchange)

Subsequent to the project concepts developed for the Stormwater Resource Plan, C/CAG worked with its member agencies to develop additional regional project concepts to help reduce the potential green streets burden on cities indicated as needed by the RAA modeling to meet the MRP 2.0 goal for PCBs load reduction via GI by 2040. San Bruno had identified the need for retention within the Crestmoor Canyon watershed to address storm drain system capacity deficiencies. Ultimately, C/CAG and the City collaborated to conceptualize an approximately 20-acre-foot regional underground stormwater capture facility on Caltrans property within the large vacant land area within the I-280/380 interchange. Similar to the Belmont project, C/CAG worked with the Natural Resources Agency to provide \$913,000 to San Bruno for preliminary design and environmental review for the project. In addition, the County of San Mateo received a U.S. EPA Water Quality Improvement Fund (WQIF) grant under which \$200K was provided to the San Bruno project for preliminary design, for a total of \$1.13M between the two funding sources. San Bruno participated in the joint Request for Proposals process with C/CAG, Redwood City, and the County of San Mateo and has contracted with a design consultant and executed a project oversight cooperative agreement with Caltrans. In FY 2022/23 the City completed the pre-design phase with geotechnical, utility surveys, and other preliminary design studies as part of the Caltrans Project Study Report-Project Development Support (PSR-PDS) document. In FY 2022/23, with support from C/CAG, the City also secured a member-directed spending request through Congresswoman Jackie Speier's office for an additional \$2.4M (plus 20% matching funds) to advance the project through the PA&ED phase. Caltrans has indicated the PA&ED and PS&E phases of the project will be at no additional project cost to the City for Caltrans oversight. In FY 2023/24, The City submitted the grant application for the \$2.4M earmark and is awaiting confirmation from the U.S. EPA.

Redwood City Project (Red Morton Park)

Like the San Bruno project, C/CAG worked with Redwood City staff to identify a regional project opportunity to help the City reduce its potential green streets burden to meet the MRP goal for PCBs load reduction via GI by 2040, identified through the RAA modeling. A two-phase project was conceptualized for Red Morton Park, with underground storage systems proposed beneath two playing fields, with a combined storage capacity of ~43 acre-feet. As with the San Bruno and Belmont projects, C/CAG worked with the Natural Resources Agency to provide \$913,000 to do preliminary design and environmental review. Redwood City also participated in the joint Request for Proposals process and has contracted with a design consultant. Like San Bruno, the County of San Mateo provided an additional \$200,000 from its U.S. EPA grant for preliminary design, for a total of \$1.13M between the two funding sources. The preliminary design report identified three primary potential project alternatives: one that is sized to treat the 85th percentile design storm (9.5 acre-feet of storage capacity); one that maximizes the size of the storage beneath the first playing field (23.5 acre-feet of storage); and a third that maximizes potential storage, including additional storage beneath the second field (30 acre-feet of storage). Based on further consideration of the preliminary design report, the City has since approved advancing design work for the

maximized single field alternative. In FY 2022/23 the City advanced towards 60% designs for the single field project alternative for an 85th percentile capture design volume and initiated negotiations with Caltrans on potential funding support through a cooperative implementation agreement. In FY 2023/24 the project progressed work on the 90% design and the City continues to seek funding beyond the design phase. Due to elevated groundwater levels, the project is not expected to be able to provide for infiltration of captured water and instead focuses on storage and treatment for return to the storm drain system. Additional project alternatives, including capability to utilize captured water for onsite irrigation and toilet flushing, diversion to sanitary sewer, permeable pavement and bioretention in the adjacent parking lot, and a recirculating surface stream are also being evaluated.

Regional Project Planning and Collaborative Framework

As mentioned above, C/CAG worked with its state legislative delegation to secure a \$3M (\$2.94M after deducting the State's administrative costs) grant to advance regional stormwater capture opportunities and a coordinated programmatic approach to regional distributed GI implementation. The bulk of those funds were allocated to initial design and environmental review of the Belmont, San Bruno, and Redwood City regional projects, described above. C/CAG directed the remaining funds (\$200,000) from the state budget allocation to a collaborative effort to further advance regional-scale stormwater management opportunities in San Mateo County. With oversight and input on the project deliverables through a Technical Advisory Committee, including representatives from C/CAG's member agencies, OneShoreline, the Bay Area Water Supply Conservation Agency, Silicon Valley Clean Water and the Regional Water Quality Control Board, C/CAG completed a multi-part project culminating in the Regional Collaborative Program Framework White Paper (White Paper) in January 2022.

The core components of the project included: 1) developing drivers and objectives for regional-scale stormwater management and a business case and collaborative framework for San Mateo County Permittees (and other potential project partners) to work together to share costs and benefits of these large-scale regional projects; 2) conducting a countywide analysis of regional capture project opportunities and ranking opportunities based on key performance indicators that map onto the selected multi-benefit drivers and objectives; 3) developing preliminary design concepts and cost estimates for the five highest performing sites from the analysis (note – this portion of the project was funded by a portion of the County's EPA Water Quality Improvement Fund grant); 4) conducting a countywide credit trading feasibility analysis focused on evaluating the market feasibility for Regulated Projects to participate in an off-site alternative compliance/credit trading program; and 5) developing an innovative funding and financing report to support further exploring options in San Mateo County for GI investments countywide, and how funding and financing options might be integrated into a Regional Collaborative Program. The final project deliverables are available on the dedicated Regional Collaborative Program website www.flowstobay.org/regional-collaborative.

The White Paper laid the foundation for further developing a Regional Collaborative Program that provides a cost-effective mechanism to meet local stormwater quality requirements while delivering multiple benefits, including sustainable stormwater management and climate resilience. The Technical Advisory Committee identified a Regional Collaboration Program framework option that includes both a near-term Memorandum of Understanding (MOU)-based approach and a longer-term market-based approach. In FY 2022/23, C/CAG developed the structure and parameters for an Interim MOU-Based Regional Collaborative Program (Interim Program) and outlined them in a draft Interim Program Report. The Interim Program is intended to enable County jurisdictions to participate in cost-sharing or other transactions to fund the implementation and maintenance of regional stormwater management projects

to better meet MRP and other watershed management needs. The Interim Program Report describes eligible participants, buyers, and sellers; a proposed unit of exchange (“greened acres”) and cost basis; exchange boundaries; and methods of exchange based on an MOU approach (drawing from the coordination meetings and outcomes from discussions regarding initial operations and maintenance cost-sharing for the Orange Memorial Park regional project in South San Francisco, as described above). With input from C/CAG’s WARP (Ad-hoc of the Stormwater Committee) the final MOU-Based Interim Collaborative Program Summary Report was completed in fall 2023.. C/CAG has plans to expand the Regional Collaborative Program design to include a new OneWatershed Climate Resilience Framework with recently awarded funds under the Governor’s Office of Planning and Research’s Integrate Climate Resilience and Adaptation Program Adaptation Planning Grant, which will be completed by January 2026. The intent of the OneWatershed Framework is to provide further basis for regional-scale collaborative planning and implementation of multi-benefit GI and other nature-based infrastructure solutions that equitably and holistically address, water quality, climate adaptation and community benefit goals throughout San Mateo County.

Parcel-Scale Stormwater Management

Expanded New/Redevelopment Requirements

In recent years, an increasing number of San Mateo County Permittees began subjecting non-regulated new and redevelopment projects to stormwater management requirements. This effort to go beyond what was required in the MRP was intended to help meet the long-term goals of stormwater quality improvements and greening of infrastructure while lessening the financial burden to the municipalities. For example, Redwood City requires substantial commercial remodels and any new commercial or residential building to incorporate stormwater treatment measures sized in accordance with Provision C.3. The City of South San Francisco requires sidewalks in the public right of way fronting regulated new and redevelopment projects to be permeable. However, MRP 3.0 C.3 requirements for lower thresholds and treatment of improvements in the frontage, which took effect on July 1, 2023, is affecting the ability of Permittees to require development projects to “go above and beyond” the MRP requirements.

C/CAG has supported agencies following suit by providing detailed information on these types of approaches to all member agencies for consideration. These tools and resources are available via the San Mateo Countywide Sustainable Streets Master Plan. Typical design details for stormwater management systems are also provided on the Program website in the GI Design Guide and C.3 Regulated Projects Guide, both of which were updated in Fiscal Year 2023/24.

Rainwater Harvesting Rebates/Incentives

C/CAG has been partnering with BAWSCA to implement a joint rebate/incentive program for rainwater harvesting since late 2014. Under this program, C/CAG has provided a countywide rebate of \$50/barrel that is matched by many of the water purveyors in the County. Starting in FY 2020/21, C/CAG expanded its incentives to provide rebates for larger storage systems, offering \$100 for systems between 100-199 gallons and \$150 for over 200 gallons, all of which continue to be combined with \$50/system rebates from participating water purveyors. In addition, C/CAG added a new stacked \$300 rain garden incentive on top of rebates from participating water purveyors for BAWSCA’s “Lawn Be Gone!” turf replacement program.

In FY 2021/22, C/CAG piloted two bulk order rebate campaigns, offering a discounted rain barrel on pre-order through a partnership with RainWater Solutions, and in FY 2022/23, C/CAG and RainWater Solutions offered four pre-order deliveries. During the four events, C/CAG helped distribute 825 rain barrels to

residents throughout the county. Continuing on the success of the rain barrel distribution campaign C/CAG and RainWater Solutions launched the third annual Bulk Rain Barrel Program in FY 2023/24. With a limited budget, the Program implemented one distribution event, maintaining the momentum of previous years and the rain barrel bulk program's success in encouraging rain barrel installations and rebate applicants in San Mateo County through lower-cost, high-quality rain barrels that can be pre-purchased and picked up at a central location within the county. The City of San Mateo served as this central location and hosted an event in November of 2023. Together, C/CAG, the City of San Mateo, and RainWater Solutions were able to provide an opportunity to deliver 297 high-quality, lower-cost rain barrels to the public in a convenient manner, while advancing the benefits of stormwater harvesting and stormwater pollution prevention messaging. Over 3,460 rain barrels have been installed to date in San Mateo County under the rebate program.

As part of the rain garden incentives program beginning in Fiscal Year 2019/20, C/CAG partnered with the Master Gardeners and University of California Extension to implement two consecutive years of a pilot Green Streets Stewardship Program to help raise awareness about GI in the county and to help municipalities ensure their facilities are properly maintained. Since 2020, the Master Gardeners completed nine stewardship events at two locations coinciding with the Safe Routes to School and Green Streets Infrastructure Pilot Projects funded by C/CAG mentioned below (Half Moon Bay Library/Cunha Middle School and Cabrillo Elementary School). The stewardship activities are focused on evaluating and improving sites in the following focus areas: litter/debris, vegetation, and soils. Beginning in FY 2022/23, the Pilot Program was placed on hold until additional funding can be committed to advance community-based GI stewardship in the county. SMCWPPP has also started exploring a proposal for a Pilot Workforce Development Program focusing on addressing GI maintenance needs in the county and supporting skills development for underserved communities.

California Resilience Challenge Grant – Resilient San Carlos Schoolyards

During the 2020 grant cycle, C/CAG received one of 12 California Resilience Challenge grants in the state to develop resilient schoolyard concept plans for multiple sites in the San Carlos School District to show how GI can be integrated to build climate resilience while also improving water quality, increasing shading and greening on campuses, enhancing outdoor learning environments, and making curriculum connections with teachers and students. This builds on existing school-related efforts that C/CAG has been implementing, including partnership with the County Office of Education on its environmental literacy program and providing funding for integrated Safe Routes to School / Green Infrastructure projects further described below in the Street-Scale Stormwater Management section. In winter of 2022, the project team completed the concept plans for the three selected school sites and compiled the plans into a comprehensive Resilient San Carlos Schoolyards Concept Plan Report (available at the project [website](#)). The Program Director co-presented the report with the project team and stakeholders at the February 16, 2023, San Carlos School Board meeting and advocated to include the concept plans in the parallel strategic planning and Facility Master Plan update. Since completing the report and concept plans, the School District has adopted its updated Facilities Master Plan, which includes the San Carlos Resilient Schoolyards Report as an appendix. The School District also passed a bond measure to fund implementation of the Facilities Master Plan and the project team and partners continue to seek additional funding to support full integration of the schoolyard resilience components. The Program Director also presented the project at the March 31, 2023, panel on the 2023 California Resilience Challenge Grant Showcase hosted by the Bay Area Council, as well as at the CASQA Annual Conference on September 12, 2023.

Green Infrastructure Design Guide and GI Videos

As reported in prior years and described above, C/CAG created a comprehensive GI Design Guide detailing how GI can be effectively incorporated into both parcel- and street-scale projects, including a library of typical design details. In FY 2023/24, C/CAG updated the GI Design Guide to a new version 2.0 containing updates to reflect changes and requirements in MRP 3.0 and new guidance on mulch, trees and other GI-related information. C/CAG continued to educate and inform member agencies of its availability and supported its access via the flowstobay.org website.

In FY 2021/22, C/CAG developed a series of GI videos that link back to the core focus areas and scales for GI described in the GI Design Guide. The five-part video series includes an overall GI video and three focus videos showcasing GI in sustainable streets, schools, residential applications and effective GI maintenance practices. The videos were finalized and posted on the SMCWPPP website (www.flowstobay.org) and the Flows To Bay YouTube channel (<https://www.youtube.com/@flowstobay>) in early FY 2023/24.

Street-Scale Stormwater Management

Countywide Sustainable Streets Master Plan

In 2018, C/CAG was awarded a nearly \$1M Caltrans Climate Adaptation Planning grant to develop the San Mateo Countywide Sustainable Streets Master Plan (SSMP) that prioritizes opportunities to integrate GI with planned transportation projects to help adapt the roadway network to a changing climate while simultaneously improving water quality. The SSMP prioritizes identified transportation needs (pulled from active transportation and Complete Streets plans, Safe Routes to School walk audits, Specific Plans, etc.) for GI integration using numerous technical suitability and co-benefit criteria. As part of the SSMP, C/CAG modeled future climate impacts on precipitation patterns, advancing the county's understanding of how storm intensity and frequency may change under future climate conditions. The SSMP includes 11 project concepts illustrative of different Sustainable Street typologies and geographically distributed throughout the county. Included in the appendices is a new Intersection Assessment Tool that allows municipalities to rapidly determine the feasibility of incorporating stormwater curb extensions at an intersection, as well as a complete library of typical design details for Sustainable Street projects. High-resolution drainage delineations were developed for the entire county, further advancing San Mateo Permittees' digital mapping of storm drain catchments down to the catch basin scale. The SSMP also includes model Sustainable Street policy language for Permittees to consider adopting, including model Sustainable Streets language for policy documents, a model Sustainable Streets resolution and policy to go beyond typical Complete Streets policies, a model resolution for GI development standards for new buildings, and model conditions of approval for development projects to require Sustainable Streets implementation as part of private development.

Since its completion, C/CAG has continued sharing resources within the SSMP to its member agencies through workshops and Subcommittee meetings, especially regarding updates to the GI Tracking and Mapping Tool and continued sharing the resources online through the dedicated SSMP webpage www.flowstobay.org/ssmp. In FY23/24, SMCWPPP developed and began implementing a workplan for Phase 2 of the GI Tracking and Mapping Tool, focusing on project database QA/QC, user interface improvements, new metrics and visualization capabilities for water quality and community co-benefits, and creating a new public facing website with content and dashboard enhancements. Additionally, C/CAG staff pursued a member-directed spending request for federal earmark funding to support design phase funding for up to five projects with concept plans from the SSMP located in disadvantaged/vulnerable communities. With leadership from Congressman Mullin's Office, Congress passed and the President signed an appropriations bill as part of the 2024 federal spending package that included \$850,000 to

support this Sustainable Streets Design Pilot Program. Staff have proposed supporting designs for projects in Colma, Daly City and East Palo Alto with the available funding and funding agreements are slated to be executed with the project sponsors in FY 2024/25.

Safe Routes to School / Green Infrastructure Pilot Projects

In 2017, C/CAG awarded just over \$2M to 10 pilot projects throughout the County integrating Safe Routes to School and GI. These projects were funded with equal shares of Safe Routes to School and stormwater program funds, with funds from C/CAG covering up to 85% of construction costs. In June 2024, the last of the ten projects was constructed. C/CAG staff has been compiling information from each of the projects detailing total costs, relative shares of Safe Routes to School and stormwater costs, and impervious area treated. These results are summarized in Table 3-1.

Table 3-1 shows that the average cost per acre treated is approximately \$300,000 when using just the estimated GI project costs (which are often difficult to clearly separate given the integrated nature of things like paving, concrete gutter work, etc.) or \$550,000 when using total project costs. The cost effectiveness also varies among projects, with the projects treating the largest areas generally tending to be more cost effective, which highlights the importance of incorporating GI into projects where it will have the most benefit in terms of area treated. While these costs are still preliminary as C/CAG and member agency staff are finalizing results of the pilot program, they are illustrative of likely costs to treat an acre of impervious area within the public right of way. C/CAG staff will be presenting the results of the pilot program at the CASQA Annual Conference in October 2024.

Table 3-1. Pilot Integrated Safe Routes to School and Green Streets Infrastructure Project Costs (2017-2024)

Project Location	Description/Project Elements	Drainage Area (acres)	Green Infrastructure Project Costs	Safe Routes To School Project Costs	Non-participating /other costs	Total Cost	Cost/Acre Treated (GI Cost Only)	Total Project Cost/Acre Treated
Menlo Park	Two linear planters (both sides of street) w/underdrain, new crossing w/flashing beacons, new sidewalks/paths	1.46	\$291,541	\$240,800	\$44,213	\$576,554	\$199,685.62	\$394,900.00
Pacifica	Two curb extensions (both sides of the street) w/o underdrain, new crossing with island passage and flashing beacon	1.25	\$147,392	\$150,246		\$297,638	\$117,913.60	\$238,110.40
County	One "L" shaped planter behind curb w/o underdrain, one mid-block crossing (no stormwater), one crossing with new valley gutter and sidewalk	0.23	\$146,064	\$153,817	\$8,617	\$308,498	\$629,586.21	\$1,329,732.76
Millbrae	Five curb extension/bulbouts w/underdrain, three crossing improvements	1.95	\$349,663	\$157,190	\$396	\$507,249	\$179,314.36	\$260,127.69
Brisbane	Six curb extension/bulbouts w/underdrain, and an island crossing, eight crossing improvements	0.78	\$343,843	\$510,830		\$854,673	\$439,135.38	\$1,091,536.40
Colma	Two mid-block crossings with three curb extensions/bulbouts, w/underdrains and flashing beacons	1.47	\$185,770	\$121,922		\$307,692	\$126,374.15	\$209,314.29
Half Moon Bay	Three bulbouts with five bioretention areas w/o underdrains, new crossings, and additional midblock crossing w/o bioretention	0.48	\$303,554	\$202,369		\$505,923	\$632,403.75	\$1,054,005.83
Daly City	Two bulbouts with three bioretention areas w/underdrains, new crossings and ramps	1.40	\$118,523	\$61,057		\$179,580	\$84,659.29	\$128,271.43
Redwood City	Five bioretention areas w/ underdrains, new crossings and ramps w/ four bulbouts, high visibility crosswalks and two RRFBs	2.83	\$396,697	\$245,440		\$642,137	\$140,175.62	\$226,903.53
East Palo Alto	Eight bioretention areas w/ underdrains, new sidewalk, sharrow, curb ramps and striping w/ four bulbouts	6.22	\$1,270,527	\$585,382		\$1,855,909	\$204,264.75	\$298,377.57
						Average	\$275,351	\$523,128

Non-Regulated Green Infrastructure Projects

C/CAG and its member agencies have been proactively building non-regulated GI projects since C/CAG provided its first pilot project funding to four projects in 2007. During the current permit term, municipalities have continued implementing voluntary GI projects consistent with the MRP requirement for “no missed opportunities,” primarily street-scale projects integrated with transportation improvements, as well as planning projects towards addressing the C.3.j GI numeric targets. C/CAG maintains a [GIS Story Map](#) detailing public GI projects (note: the map is currently in process of being updated and does not reflect all completed projects to-date; additionally not all projects shown are non-regulated though the majority are non-regulated retrofit projects). C/CAG also supports its member agencies in tracking GI implementation for purposes of quantifying mercury and PCBs load reductions.

Tracking and Reporting Progress on Green Infrastructure

During FY 2023/24, SMCWPPP continued to develop and implement methods to track and report implementation of GI in San Mateo County and track associated pollutant load reductions. At the end of each fiscal year, SMCWPPP Permittees provide data on completed GI projects in their jurisdictions, including information needed to calculate mercury and PCBs load reductions associated with these projects. The analysis of mercury and PCB loads reduction is described in Section 11/12 (Mercury/PCBs Controls) of this report and the *Mercury and PCBs Control Measures Report* in Appendix 11.

As mentioned above, C/CAG utilized funding through the San Mateo Countywide SSMP project to create an updated web-based San Mateo County GI Tracking Tool (Tool). The Tool is publicly available via the Countywide Program’s website at this [link](#). The Tool allows for tracking all scales of GI implementation (regional, street, and parcel), and provides the tracking needed to demonstrate that wasteload allocations for TMDLs are being met. The public interface of the Tool is a dynamic map showing the locations of implemented GI with descriptions of the GI measure, location, characteristics of the area treated, and estimated pollutant load reductions.

The Tool has been populated with information on GI constructed in the County through FY 2022/23. Enhancements to the Tool completed during FY 2023/24 focused on improving the user functionality and interface of the Tool; incorporation of new metrics, such as volumes managed, climate resiliency benefits, Greened Acres; and changes to the landing page and dashboards to enhance outreach to the public and municipal officials about GI. A work plan for future asset management-related enhancements and other improvements to the Tool are planned for FY 2024/25.

During FY 2022/23, the Tool development team developed a technical methodology to translate volumes of runoff managed by regional capture projects to MRP compliance metrics, specifically impervious acres managed (“Greened Acres”) by GI retrofit projects. A memorandum was prepared that summarizes the proposed methodology for calculating stormwater capture for a regional project that diverts stormwater from a creek channel or storm drain, in a way that is translatable to the sizing criteria in Provision C.3.d and allows Greened Acres to be tracked for regional projects. The memorandum also describes the modeling analysis conducted to estimate stormwater capture for an example regional project in San Mateo County (Orange Memorial Park) and demonstrates the calculation of Greened Acres for this project. C/CAG staff and consultants met with Water Board staff on March 6, 2023, and January 19, 2024, to discuss the proposed methodology. In a letter dated April 29, 2024, Water Board staff accepted the methodology and provided comments on the role of regional projects in achieving GI goals in the region. SMCWPPP will continue to meet with Water Board staff during FY 2024/25 to discuss remaining issues.

Regional Collaboration

BAMSC Development Subcommittee

SMCWPPP continued to participate in the Development Subcommittee (DS), which meets approximately quarterly, to share information on topics related to C.3 and GSI implementation. Topics discussed during FY 2023/24 included:

- GI maintenance, training and certification (through the National GI Certification Program) and workforce development of maintenance professionals in the Bay Area and nationally;
- Lessons learned by Bay Area municipalities implementing GI projects;
- Trees and stormwater integration, green streets and urban forestry integration in the City of Denver, and the activities of the regional Trees and Stormwater Work Group;
- Integrating green and complete streets, including Bay Area and statewide efforts to increase funding, work with active transportation organizations including the Metropolitan Transportation Commission, CalBike and Caltrans, and updates on the implementation of the Roadmap of Funding Solutions for Sustainable Streets¹ (2018) with the San Francisco Estuary Partnership.

Through the BAMSC DS, SMCWPPP also participated in regional work groups and projects that assist SMCWPPP and its San Mateo County municipalities in meeting specific requirements of Provision C.3, as described below.

Regional C.3 Work Groups

During FY 2022/23, SMCWPPP staff participated in three work groups related to C.3 – the Alternative Treatment Systems Work Group, the Special Projects Category C/Affordable Housing Work Group, and the Road Reconstruction in DACs Work Group. Discussions in these work groups led to the development of draft language for an MRP 3.0 Provision C.3 Amendment. SMCWPPP worked with other MRP permittees to prepare testimony for an adoption hearing scheduled for the October 11, 2023, Water Board meeting. At the hearing, the Amendment (Order R2-2023-0019) was adopted and went into effect on November 1, 2023. SMCWPPP staff also participated in several BAMSC regional work groups that met in FY 2023/24 including the Trees and Stormwater Work Group, the Bay Area Hydrology Model Update Work Group, and the Asset Management Work Group.

Bay Area Hydrology Model Update

For Regulated Projects that are required to meet the hydromodification management (HM) requirements in Provision C.3.g, a continuous simulation hydrologic computer model must be used to simulate pre-project and post-project runoff and design HM controls to meet HM standards. The Bay Area Hydrology Model (BAHM) is a tool developed to assist permittees and development project engineers with sizing and design of facilities needed to meet the HM requirements in Provision C.3.g and to demonstrate that planned facilities meet the HM standards. The BAHM and a companion User Manual were developed in 2007 by Clear Creek Solutions, based on the Western Washington Hydrology Model (WWHM), and funded jointly by the Santa Clara, San Mateo, and Alameda countywide stormwater programs. These programs also funded an update to the BAHM and User Manual in 2013.

¹ https://www.sfestuary.org/wp-content/uploads/2018/05/Roadmap_Funding_Solutions_Sustainable_Streets_FINAL_reduced.pdf

The BAHM is recognized in the MRP as an acceptable tool for showing compliance with HM standards and those standards have not changed in MRP 3.0. However, updates to BAHM and the User Manual were needed to improve model performance and design capability, extend rainfall and evaporation data, and make it more user-friendly. In addition, the Contra Costa Clean Water Program requested that data for their county be incorporated into the BAHM.

To accomplish these tasks, SMCWPPP provided financial support to a BAMSC project of regional benefit, along with the Santa Clara, Alameda, and Contra Costa programs, to update the BAHM and User Manual. The Project Team consisted of EOA and subcontractor Clear Creek Solutions. A Regional BAHM Updates Work Group was formed to scope and direct the project and five meetings were held at appropriate milestones. Representatives of SMCWPPP participated in the Regional Work Group.

Updates to the BAHM software and User Manual began in January 2023 and were completed in June 2023. A report on the BAHM updates was provided in the SMCWPPP FY 2022/23 Annual Report. During October 2023, virtual trainings were conducted for beginning and advanced users as well as municipal reviewers. The BAHM2023 software and User Manual have been finalized and posted on the Clear Creek Solutions [website](#), along with the recordings of the trainings and a video library by topic. The work on this BAMSC regional project is now complete.

Biotreatment Soil Media (BSM) and Biotreatment Wood Mulch (BWM) Specifications

In FY 2023/24, SMCWPPP continued to support municipal staff, consultants and suppliers who have questions on the review and use of BSM. Countywide Program staff screened and worked with vendors that are supplying the BSM product in the Bay Area and wish to be added to the vendor list that is posted on the SMCWPPP [website](#). The vendors must demonstrate an understanding of the 2016 BASMAA specification, submit lab results and a sample of their BSM product, and use consistent terminology on their websites advertising the product.

In 2021, SMCWPPP, the City of San Jose, StopWaste, and the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) developed a regional specification for composted wood mulch to be used in bioretention areas. The mulch is referred to as Biotreatment Wood Mulch (BWM) to accompany the BSM specification. The benefits of composted wood mulch have been discussed during NDS meetings and workshops, and descriptions added to the C3 Regulated Projects Guide and GI Design Guide. See the [BAMSC](#) and [Flowstobay](#) websites for the BSM and BWM specifications, vendor lists and more information.

Biotreatment Soil Media Specifications and Bioretention Design with Trees

As a result of the Biotreatment Soil Roundtable held on June 30, 2016, a regional work group was formed to discuss designs that incorporate trees into bioretention areas. Countywide Program staff have taken the lead on facilitating this BSM Tree-Design Work Group in the last few years. In FY 2023/24, the BSM Tree-Design Work Group met twice but under the name of Trees and Stormwater Regional Work Group to consider topics related to Provision C.3.d.iv in the MRP allowing permittees to work together on a tree-related proposal to inform MRP 4.0. After discussion, it was decided to incorporate discussions of the role of trees and stormwater into the Long Term GSI Technical Working Group that will begin meeting in FY 2024/25. In FY 2024/25, the Tree-BSM Design Work Group will reconvene to provide a forum for evaluating and discussing designs of tree-based GI systems, BSM specifications and other topics. The Work Group will work with Water Board staff and other stakeholders to improve the knowledge base of tree-based GI systems in the Bay Area.

Participation in Processes to Promote Green Infrastructure

Provision C.3.j.iii. requires that Permittees individually or collectively, track processes, assemble and submit information, and provide informational materials and presentations as needed to assist relevant regional, State, and federal agencies to plan, design, and fund incorporation of GI measures into local infrastructure projects, including transportation projects. SMCWPPP is tracking and participating in BAMSC activities as well as conducting its own activities to assist Permittees comply with this provision.

C/CAG participated in the following efforts to promote GI:

- Technical and panel presentations at the California Stormwater Quality Association 2023 Annual Conference in San Diego on September 12, 2023:
 - [“The Climate Resilience Resources Guide](#) (2023) - Tools for Planning and Implementing Climate-Resilient Green Stormwater Infrastructure” (technical presentation)
 - “Equity Approaches in Climate Resilience and Nature-Based Solutions Planning in the Bay Area (panel)
 - “Building Adaptation Capacity through Resilient Schoolyards in San Mateo County” (technical presentation)
 - “GSI Implementation in the San Francisco Bay Area – Challenges and Opportunities for a More Collaborative, Integrated, and Innovative Future” (panel)
- Met with Congressional leaders in Washington D.C. on March 12 through March 14, 2024 to advocate for federal funding for GI projects in San Mateo County, focusing on a \$59 million grant application submitted by C/CAG under the NOAA Climate Resilience Regional Challenge Grant and submitting federal member directed spending requests through the Senator’s offices under the Fiscal Year 2024 Budget Appropriations Act for multi-benefit GI planning and a pilot GI maintenance workforce development program.
- Participated in a panel focusing on GI and resilient schoolyards partnerships at the San Mateo County Office of Education’s Climate Ready Schools Symposium on April 30, 2024. The panel, titled “Student-Centered Systems Change” was addressed to school district leadership, school site staff, and the County Superintendent’s Office staff on effective ways to integrate GI with schoolyard greening and climate resilience initiatives.
- Partnered with CASQA to present the CASQA report titled [“The Socioeconomic Value of Urban Stormwater Capture](#) (2024)” at the CASQA Quarterly Seminar Series on April 25, 2024, which included an evaluation of the socioeconomic value of GI projects in San Mateo County, including early implementation of sustainable streets projects throughout the County and a regional-scale multi-benefit stormwater capture project at Orange Memorial Park in South San Francisco.
- Signed onto the CASQA coalition support letter for AB 867 (Allen) and AB 1567 (Garcia), the two climate bonds developed by the State Legislature for the second year in the 2023-24 legislative cycle.
- Contributed GI-related content to the CASQA “Rain Ready California” website intended to raise awareness about the value of stormwater as a resource. The website, <https://www.rainreadyca.org/>, went live in June 2024.

The BAMSC FY 2023/24 Annual Report Regional Supplement for New Development and Redevelopment (Appendix 22) provides additional information on regional participation in processes to promote GI.

FUTURE ACTIONS

In FY 2024/25, SMCWPPP plans to continue working with the NDS to conduct the following activities to assist San Mateo County municipalities to comply with MRP Provision C.3:

- Continue to exchange information with San Mateo County municipalities on MRP implementation and other timely issues through NDS meetings and/or C.3 workshops.
- Update the C.3-C.6 Development Review Checklist as needed to provide assistance with regulated project thresholds and MRP 3.0 criteria.
- Support San Mateo County municipalities with guidance on GI Plan implementation.
- Continue to conduct GI outreach and education with the public, municipal staff, and elected officials and further raising awareness about GI, including supporting and highlighting local GI projects and leveraging the GI video series, through the SMCWPPP website and GI Tracking Tool.
- Continue to coordinate with other related SMCWPPP subcommittees as needed (e.g., the Public Information and Participation Subcommittee to engage on GI outreach).
- Continue updating and improving the GI Tracking Tool, including training on use for Permittees, updating the database of projects and evaluating opportunities to expand the functionality of the tool to track and report information related to new asset management requirements under MRP 3.0.
- Continue to collaborate with BAMSC and Bay Area countywide stormwater programs on MRP 3.0 implementation, particularly GI implementation and guidance, updates to the BSM and BWM specifications and supplier lists, and designs for bioretention with trees through the BAMSC Development Subcommittee Tree-BSM Design Work Group.
- Collaborate with the BAMSC Development Subcommittee and Water Board staff and participate in regional development-related work groups as appropriate or discussions related to the amended MRP 3.0.
- Continue advancing the Regional Project Planning and Collaborative Program Framework, including advancing the initial phase of the MOU-based program to support implementation of the existing planned regional projects and to support long-term funding for the operations and maintenance of the completed regional project at Orange Memorial Park. New program elements and outputs may include development and legal review of the interim MOU-based Regional Collaborative Program, documents supporting initial pilot cost-sharing (e.g., a model MOU and/or interagency agreement, and O&M certification or other credit certification documents), and implementation of initial cost-sharing arrangements on a pilot project.
- Continue supporting, as needed, the Cities of San Bruno, Belmont, and Redwood City on advancing designs and environmental review for regional projects and seek new partnership and funding opportunities to advance these projects towards implementation.
- Advance the grant funded San Mateo County OneWatershed Climate Resilience Framework and Community-led Plan focusing on addressing shared risk to water infrastructure and supporting adaptive capacity for vulnerable communities and align new OneWatershed framework with and build from the existing Regional Collaborative Program developments. Seek additional funding to support OneWatershed Infrastructure implementation, via implementation funds for early pilot projects, additional watershed-scale OneWatershed resilience plans and a countywide

OneWatershed Strategic Plan with a pilot workforce development component.

- Continue seeking funding for pilot Resilient San Carlos Schoolyards projects and other schoolyard greening projects in the county, building from prior concept planning and engagement efforts. In parallel, as part of C/CAG's core outreach program, continue implementing pilot rain barrel installations at schools and community organizations including community-based workshops demonstrating how to install rainwater harvesting systems and providing details on C/CAG's and BAWSCA's rebate programs. Continue supporting the County Office of Education's Sustainable and Climate Ready Schools Initiative through community partnership.
- Continue supporting member agencies in pursuing funding for implementing projects identified in the Sustainable Streets Master Plan, including the 11 project concepts.
- Continue administering the rainwater harvesting rebates and additional incentives for residential rain garden installations as part of the Lawn Be Gone! rebate program, in partnership with BAWSCA. The rain barrel rebate program will include two planned pilot bulk-order distribution events hosted in partnership with C/CAG member agencies to keep up momentum and encourage participation in the program. Integrate GI outreach efforts to include webinars in partnership with BAWSCA focused on the rain garden and Lawn Be Gone! rebate program and lawn/rain garden integration replacement process.
- Plan to present at the annual CASQA conference in October 2024 on GSI Funding Strategies, Water Supply Perspectives on Urban Stormwater Capture and Use in Northern California, the development of the OneWatershed Framework in San Mateo County, and C/CAG's Integrated Safe Routes School/Green Stormwater Infrastructure Pilot Program.

SECTION 4

C.4 INDUSTRIAL AND COMMERCIAL SITE CONTROLS

INTRODUCTION

A primary goal of SMCWPPP's Commercial, Industrial and Illicit Discharge (CII) component is to assist San Mateo County Permittees in controlling the discharge of pollutants in stormwater from commercial and industrial businesses to the maximum extent practicable. San Mateo County Permittees are responsible for complying with various commercial and industrial business facility inspection requirements under MRP Provision C.4. SMCWPPP's CII component assists San Mateo County Permittee staff with understanding these MRP requirements and develops various related tools, templates, reporting forms, and other MRP compliance support materials. The CII component also assists San Mateo County Permittees to comply with other MRP provisions that are discussed in other sections of this report (Sections 5, Illicit Discharge Detection and Elimination and Section 13, Copper Controls).

SMCWPPP's assistance with MRP Provision C.4 and other CII component provisions is coordinated through the CII Subcommittee.

IMPLEMENTATION OF MRP PROVISIONS

SMCWPPP performs a variety of tasks to assist San Mateo County Permittees with implementation of MRP Provision C.4, with input and assistance provided by the CII Subcommittee. FY 2023/24 accomplishments included the following:

- Held two CII Subcommittee meetings;
- Updated the contact lists on How Your Business Can Prevent Stormwater Pollution booklet, Vehicle Service BMP Fact Sheet and Food Service BMP Fact Sheet;
- Held a Business and Illicit Discharge Stormwater Inspector Training Workshop; and
- Updated the business stormwater inspector contact list on the SMCWPPP website.

More information about each of these accomplishments is provided below.

CII Subcommittee

The CII Subcommittee provides the opportunity for sharing information about MRP requirements related to commercial/industrial facility inspections and methods for achieving MRP compliance. The Subcommittee met two times during FY 2023/24 with good participation by municipal staff, as shown by the attendance list (Appendix 4). Ward Donnelly from the City of Daly City chaired the CII Subcommittee for the first half of FY 2023/24 and Patrick Ledesma, County Environmental Health, chaired the Subcommittee for the second half of the FY.

The meetings provided the opportunity for municipal staff to share their experiences with implementing the MRP provisions related to the CII component, including Provision C.4. During FY 2023/24 meetings, the subcommittee discussed a number of pertinent topics, including MRP 3.0 requirements, BASMAA surface cleaner certification program, mobile businesses, illicit discharges, annual reporting, and outreach materials. The subcommittee also discussed other MRP provisions with new MRP 3.0 requirements that may overlap with these inspectors' activities including MRP C.15.b.iii. emergency firefighting discharges and trash management inspections of private land drainage areas (C.10).

Program Materials

In FY 2017/18 Countywide Program staff updated the SMCWPPP Stormwater Facility Inspection Form Template and developed a Stormwater Facility Inspection Tracking Template for cities to track their stormwater inspection data, if needed. In FY 2022/23, the Stormwater Facility Inspection Tracking Template was updated to meet the requirements of MRP 3.0

In 2023/24 the contact lists in How Your Business Can Prevent Stormwater Pollution booklet was updated before conducting a print run of the booklet. In addition, the contact lists were also updated in the Vehicle Service BMP Fact Sheet and Food Service BMP Fact Sheet posted on the SMCWPPP website.

CII Training Workshop

The Business and Illicit Discharge Stormwater Inspector Training Workshop was held on June 13, 2024 in-person at the South San Francisco Library|Parks and Recreation Center and was attended by 40 people. The workshop covered the regulatory requirements of stormwater inspections, inspector resources, development of the moderate PCBs control program, and a group exercise reviewing case studies. Appendix 4 includes a copy of the workshop agenda, attendance list and evaluation summary. Based on the evaluation forms submitted, attendees generally found the workshop was useful and met their expectations. Recordings of the presentations are available to inspectors on the SMCWPPP members only webpage.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees in complying with requirements in MRP Provision C.4 include the following:

- Hold two CII Subcommittee meetings; and
- Assist San Mateo County Permittees with the implementation of commercial and industrial stormwater inspection tasks, including updating the Business Inspection Plans (BIP) template, Enforcement Response Plans (ERP) template, and inspection form and inspection tracking table, as needed.

SECTION 5

C.5 ILLICIT DISCHARGE DETECTION AND ELIMINATION

INTRODUCTION

A primary goal of SMCWPPP's Commercial, Industrial and Illicit Discharge (CII) component is to assist San Mateo County Permittees to effectively prohibit the discharge of illicit, non-stormwater discharges to the municipal storm drain system. San Mateo County Permittees are responsible for controlling non-stormwater discharges prohibited by MRP Provision C.5. SMCWPPP's CII component assists San Mateo County Permittee staff with understanding these MRP requirements and develops various related tools, templates, reporting forms, and other MRP compliance support materials. SMCWPPP's CII component also assists Permittees to comply with other MRP provisions that are discussed in other sections of this report (see Section 4, Industrial and Commercial Site Controls, and Section 13, Copper Controls).

SMCWPPP's CII component is coordinated through the CII Subcommittee. See Section 4 for further details about the CII Subcommittee.

IMPLEMENTATION OF MRP PROVISIONS

During FY 2023/24, SMCWPPP performed a number of tasks to assist San Mateo County Permittees with implementation of MRP Provision C.5, with input and assistance provided by the CII Subcommittee. Accomplishments included the following:

- Updated the table of stormwater enforcement actions against mobile businesses to share countywide with stormwater inspectors;
- Updated the Countywide mobile business inventory;
- Developed a Mobile Fueling BMP Fact Sheet;
- Updated the Illicit Discharge contact list on the SMCWPPP website; and
- Held a Business and Illicit Discharge Stormwater Inspector Training Workshop (see Section 4 for details).

More information on these accomplishments is provided below.

Program Materials

SMCWPPP has developed a variety of materials to assist municipal agency staff with implementing Provision C.5. These materials are all available on the SMCWPPP website (flowstobay.org) and continue to be useful tools that assist agency staff to achieve MRP compliance. The materials include an Illicit Discharge Investigation Field Form template, an Illicit Discharge Tracking Excel Template, and outreach

materials. In FY2022/23, Countywide Program staff worked with the CII Subcommittee to update the Illicit Discharge Tracking Template to meet requirements of MRP 3.0.

In FY 2023/24, Countywide Program staff worked with the CII Subcommittee to develop a Mobile Fueling BMP factsheet that presents BMPs for mobile businesses, residents, or commercial businesses that are utilizing mobile fueling. Final formatting was conducted by SMCWPPP's public outreach consultant. The Mobile Fueling BMP Fact Sheet was added to the SMCWPPP website's Preventing Stormwater Pollution – Mobile Cleaners and Businesses webpage. Countywide Program staff also continued to make other outreach materials available on the SMCWPPP website (flowstobay.org).

Also available on the members only section of the SMCWPPP website is the countywide inventory of mobile businesses operating in San Mateo County. The mobile businesses identified in the inventory fall into the following categories: carpet cleaners, auto washers, steam cleaners, power washers, graffiti removal, mobile fuelers and pet care providers. The county inventory of mobile businesses is updated annually. Beginning in FY 2013/14, the CII Subcommittee surveyed San Mateo County agencies and compiled information on mobile businesses that were subject to stormwater enforcement actions during that fiscal year. This information was compiled in a table and made available on the members only section of the SMCWPPP website. The table is updated annually with additional enforcement action information. A letter is mailed to mobile businesses that received enforcement actions in different jurisdictions. The letter includes the Mobile Business BMP flyer in English, Spanish and Chinese.

In addition, BAMSC has a long-standing Surface Cleaner Training and Recognition program (developed by BASMAA¹) that focuses on improving the use of BMPs for businesses that clean surfaces (i.e., sidewalks, plazas, parking areas, and building exteriors). The BMP material and quiz were recently updated. San Mateo County Permittees have continued to refer cleaners to BAMSC's website for surface cleaning training materials.

FUTURE ACTIONS

During FY 2024/25, SMCWPPP will assist San Mateo County Permittees comply with the requirements in MRP Provision C.5 by:

- Holding two CII Subcommittee meetings;
- Assisting with the implementation of illicit discharge detection and elimination tasks, including updating existing or developing new outreach materials as needed, and updating the Enforcement Response Plans (ERP) template, Illicit Discharge Investigation Field Form, and Illicit Discharge Tracking Template as needed; and
- Assisting Permittees in complying with the requirements for controlling mobile sources in MRP Provision C.5.e., including providing updated information on mobile business BMPs as needed, sharing enforcement information, annually updating the countywide mobile business inventory, and conducting outreach activities.

¹ BASMAA was dissolved as a 501(c)(3) non-profit organization in FY 2021/22 but this program is continuing via the Bay Area Municipal Stormwater Collaborative (BAMSC).

SECTION 6

C.6 CONSTRUCTION SITE CONTROL

INTRODUCTION

This component of SMCWPPP assists San Mateo County municipalities in complying with MRP Provision C.6 (Construction Site Control). This assistance continued to be provided through the New Development Subcommittee (NDS, see Section 3 for more details). Countywide Program staff also obtained input and direction from municipal agency representatives through the NDS when planning the trainings and other compliance assistance activities described below.

IMPLEMENTATION OF MRP PROVISIONS

SMCWPPP's accomplishments during FY 2023/24 include the following tasks to assist San Mateo County municipalities with implementation of MRP Provision C.6:

- Provided updates to the NDS at meetings and through emails on the reissued State Construction Stormwater General Permit (September 1, 2023), and Qualified Stormwater Pollution Prevention Plan Developer (QSD) or Practitioner (QSP) training opportunities (see Section 3 for more details about the NDS).
- Updated and distributed to municipal staff via the NDS the C.3-C.6 Development Review Checklist (PDF-Form version) with MRP 3.0 changes and requirements.
- Distributed the digital version (PDF-Form) of the SMCWPPP Construction Site Inspection Report via email to San Mateo County municipalities upon request for their use and printing.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees comply with requirements in MRP Provision C.6 include the following:

- Continue to share information about construction site controls among San Mateo County municipalities through NDS meetings;
- Continue to provide training materials to construction site inspectors; and
- Continue to coordinate with partner organizations to provide information on construction-related stormwater issues.

SECTION 7

C.7 PUBLIC INFORMATION AND PARTICIPATION

INTRODUCTION

The primary goals of SMCWPPP's Public Information and Participation (PIP) component are to:

- Educate the public about the causes of stormwater pollution and its adverse effects on water quality in local creeks, lagoons, shorelines, and neighborhoods;
- Encourage residents to adopt less polluting and more environmentally beneficial practices; and
- Increase residents' participation and involvement in SMCWPPP activities.

PIP is essential for controlling and reducing the source of pollution since many preventable pollutants are associated with everyday residential activity. Stormwater pollution may be reduced when residents are educated and motivated by the benefits of reducing pollutants. This approach of education and motivation is cost-effective and efficient in meeting the goal of reducing pollutants in stormwater to the maximum extent practicable.

IMPLEMENTATION OF MRP PROVISION C.7

The SMCWPPP PIP Subcommittee oversees the development of outreach and educational materials and guides the implementation of the PIP component of the program. The Subcommittee did not meet in FY 2023/24, however, outreach updates were sent to the Subcommittee on a quarterly basis. The reports are attached in Appendix 7A.

SMCWPPP's PIP accomplishments during FY 2023/24 include the following:

- Partnered with the Bay Area Water Supply Conservation Agency (BAWSCA) to promote the countywide rain barrel program in association with a bulk rain barrel distribution program. The supporting Rain Barrel outreach campaign received 118 rebate applications from residents for a total of 186 rain barrel installations. Over 3,460 rain barrels have been installed to date in San Mateo County under the rebate program.
- Partnered with BAWSCA to promote the rain garden rebate as part of the Lawn Be Gone! Rebate.
- Implemented rain garden-related posts on social media and the Flows to Bay website, published a blog featuring rain gardens as a prime example of neighborhood-level green infrastructure, and included the blog in several e-newsletters.
- The "How do rain gardens work?" video that was initially created in FY 2022/23 has continued to be shared with residents via social media, the website, and e-newsletters, and has now received

9.8K views on YouTube to date.

- Attendees of the May 2023 “Sustainably Stylish Rain Gardens” webinar received a second email newsletter during FY 2023/24 to maintain engagement with the participants regarding relevant actions involved in rain gardens and the relevant rebate discussed during the webinar.
- Shared educational website materials from LA Department of Water & Power (LADWP) via e-newsletter to help residents navigate the lawn conversion and rain garden process.
- Supported and continued to engage with the County Office of Education (COE) on advancing stormwater-related partnerships for facility improvements through the COE Sustainable and Climate Ready Schools Initiative.
- Promoted Coastal Cleanup Day, helping to gain 4,146 volunteers at over 30 countywide locations, resulting in 27,049 pounds of litter reported being picked up, and raising awareness of the event and the consequences of littering behaviors.
- Promoted the efforts of San Mateo County Environmental Health Services (EHS), including a campaign to reduce littering of cigarette butts, HHW Collection Program, Used Motor Oil/Filter Recycling Program, Fishing Smart in SF Bay, Safe Medicine Disposal, School Share Table Program, Healthy Nail Salon, and ReFuel Your Fun.
- Promoted Caltrans “Tarp Your Load” educational material regarding uncovered loads in English and Spanish.
- Maintained an Instagram following of +1.1K followers with 149 posts, reaching 3,509 unique users each month on average and enjoyed 248 interactions in posts with stormwater pollution prevention messaging, ad campaigns and relevant partner shares.
- Maintained over 26.3K followers on Facebook, with a total post reach of 40,191 and 423 engagement interactions through stormwater pollution prevention messaging, event promotion, ad campaigns and relevant partner shares.
- Gained 362 new email subscribers and tracked an average open rate of 57%, an average 3.8% click rate, and an average 6.7% clicks per unique opens rate.
- Delivered seven e-newsletters: four targeted at our subscriber list, and reaching an average of 3,275 out of a list of 4,559 active, opt-in subscribers with topics covering local events, online webinars, and stormwater pollution prevention information and tips.
- Delivered three e-newsletters targeted to specific audiences including a) rain barrel purchaser prospects placed on a waitlist from last FY’s (2022/23) Bulk Rain Barrel Program, b) attendees of the May 2023 Rain Garden Webinar as part of a drip-marketing campaign, and c) all participants of the FY 2023/24 Bulk Rain Barrel Program. These three e-newsletters performed at an average open rate of 78%, an average 32% click rate, and an average 39% clicks per unique opens rate.
- Recorded 98,729 annual visitors to the SMCWPPP website, which focuses on stormwater pollution prevention messaging and provided resources to residents, businesses, teachers, and city departments and municipalities.
- Participated in 11 public outreach and citizen involvement events with an estimated total of 4,828

engaged participants or attendees. These events, a mixture of virtual and in-person, provided educational content and solutions to interested residents, businesses and youth, and also offered participants the opportunity to have their questions answered.

- Participated in one countywide stormwater-focused campus presentation where we supported and facilitated one on-campus installation (for a total of four BlueBarrel and two Ivy rain barrels installed) and conducted a lecture to one middle school class about watersheds and rainwater capture.
- Performed point-of-purchase outreach with Our Water Our World materials to 12 hardware stores in San Mateo County while engaging residents and employees with eco-friendly alternatives to pesticides. To maximize our outreach efforts, two larger stores out of the 12 received a special tabling event from our local IPM expert. Between these two events, we educated 72 consumers and store employees about proper pesticide use, less toxic pesticide options, and effective alternatives to pesticides.
- Delivered outreach messaging to residents and pest control operators regarding eco-friendly alternatives to pesticides via business email, in SMCWPPP's newsletter, on the website, and social media channels.

More information about the PIP accomplishments is provided below.

C.7.b. Outreach Campaigns

Bulk Rain Barrel Pilot Outreach Program

The Bulk Rain Barrel Outreach Program in San Mateo County consisted of a mixture of digital engagement, a city partnership, and an in-person event. The goal of this outreach program was twofold. The first goal aimed to address barriers for San Mateo County residents wanting to install rain barrels on their properties. These barriers, identified through multiple survey data, were the high cost of rain barrels and the lack of convenience for finding rain barrels in the County. The second goal of this program was to promote the San Mateo County rain barrel rebate program and increase participation in the program.

Continuing on the success of the rain barrel distribution campaign from FY 2022/23, C/CAG launched the third annual Bulk Rain Barrel Program. C/CAG partnered with Rain Water Solutions in FY 2023/24 to plan one distribution event, maintaining momentum of previous years and the Bulk Rain Barrel Program's success in encouraging rain barrel installations and rebate applicants in San Mateo County through lower-cost, high-quality rain barrels that can be pre-purchased and picked up at a central location within the county. The City of San Mateo served as this central location and hosted an event in November of 2023.

Together, C/CAG, the City of San Mateo, and Rain Water Solutions were able to provide an opportunity to deliver 297 high-quality, lower-cost rain barrels to the public in a convenient manner, while advancing the benefits of stormwater harvesting and stormwater pollution prevention messaging.

Combining the bulk discount rate with the rebate incentive gave residents in BAWSCA-participating member agency service areas the opportunity to receive a rain barrel at zero net cost (Figure 7-1).



Figure 7-1 Residents picking up their rain barrels at this year’s distribution event in the City of San Mateo

Campaign Results & Evaluation

The FY 2023/24 program distributed 297 rain barrels in just one event, surpassing the total number of rain barrels distributed in any single event since the program's inception in FY 2021/22.

Results of the rain barrel outreach program as of June 30, 2024, included:

- 282,056 impressions to paid Meta and Google Ads campaigns.
- 3,779 clicks/engagement with paid Meta and Google Ads campaigns.
- 6,125 visits to the campaign landing page.
- 6,451 impressions on relevant e-newsletter and blog content.
- 54 downloads of the FY 2023/24 rain barrel paper application with rebate information on the relevant SMCWPPP web page.
- Selling and distributing 297 barrels to 177 San Mateo County residents, which will capture nearly 15,000 gallons of water each time the barrels are completely filled.
- BAWSCA received over 118 rain barrel rebate applications from SMC residents this FY.
- 76 of those BAWSCA rebates administered in San Mateo County this FY came from purchasers at this event.

To take a deeper dive into the program's success, and look to improve upon our efforts, we designed and distributed a survey via a January 2024 e-newsletter to the 177 program participants, which received a 22% response rate. Key survey takeaways included:

- 90% of respondents were very satisfied with the rain barrel program (an increase of 7% compared to FY 2022/23).
- 95% of respondents stated water conservation as the main reason they purchased a rain barrel (a decrease of only 2% as compared to FY 2022/23) followed by wanting to save money on their water bill (49%). The factor of reducing stormwater pollution slightly increased from 39% last fiscal year to 44% this fiscal year which could indicate increased awareness of this benefit from rain barrels. The question is formatted to "select all that apply". The full survey report can be seen in Appendix 7C.

The digital components of this program included a webpage on the SMCWPPP public education website, flowstobay.org. This page provided details of both the rebate program and bulk rain barrel program, including a form to quickly understand how much rebate residents are eligible for, a step-by-step video on rain barrel installation, details on ordering and picking up the rain barrel, and a list of rain barrel installers should they require additional assistance. If residents were still interested in participating in the program, they were sent to an [e-commerce site](#) set up by Rain Water Solutions to purchase a barrel online securely.

To promote the pilot and rebate program, C/CAG sent out two e-newsletters, utilized its Instagram and Facebook platforms with 27K+ total followers, used paid advertising, published on our website's blog in December 2023 (e.g., Figure 7-4), and asked that partnering agencies help spread the word on their own communications channels (Table 7-1). The paid advertising included Google Ads (Figure 7-2) and Meta Ads (Figure 7-3). While C/CAG initially considered running alternate Google Ads campaigns in Spanish and

Chinese, budgets for these items were shifted to the English campaign only in order to maximize results within a limited budget. The results of the campaigns are described in Table 7-2.

Table 7-1. Bulk Rain Barrel Pilot Outreach Program - Multimedia Promotional Campaign Results

Platform	Impressions	Clicks/Engagement
Campaign landing page	6,125	669
Google Ads	235,581	2,576
Meta Ads	46,475	1,203
Facebook posts	1,847	16
e-Newsletter	6,420	262
Blog	200	6

Table 7-2. Bulk Rain Barrel Pilot Outreach Program - Paid Advertising Results FY 2023/24

Platform	Cost	Impressions	Clicks/Engagement
Meta Ads - English	\$289.49	47,475	1,203
Google Ads - English	\$280.72	222,256	2,421
Google Ads - Spanish	\$14.60	8,105	112
Google Ads - Chinese	\$4.65	5,220	43

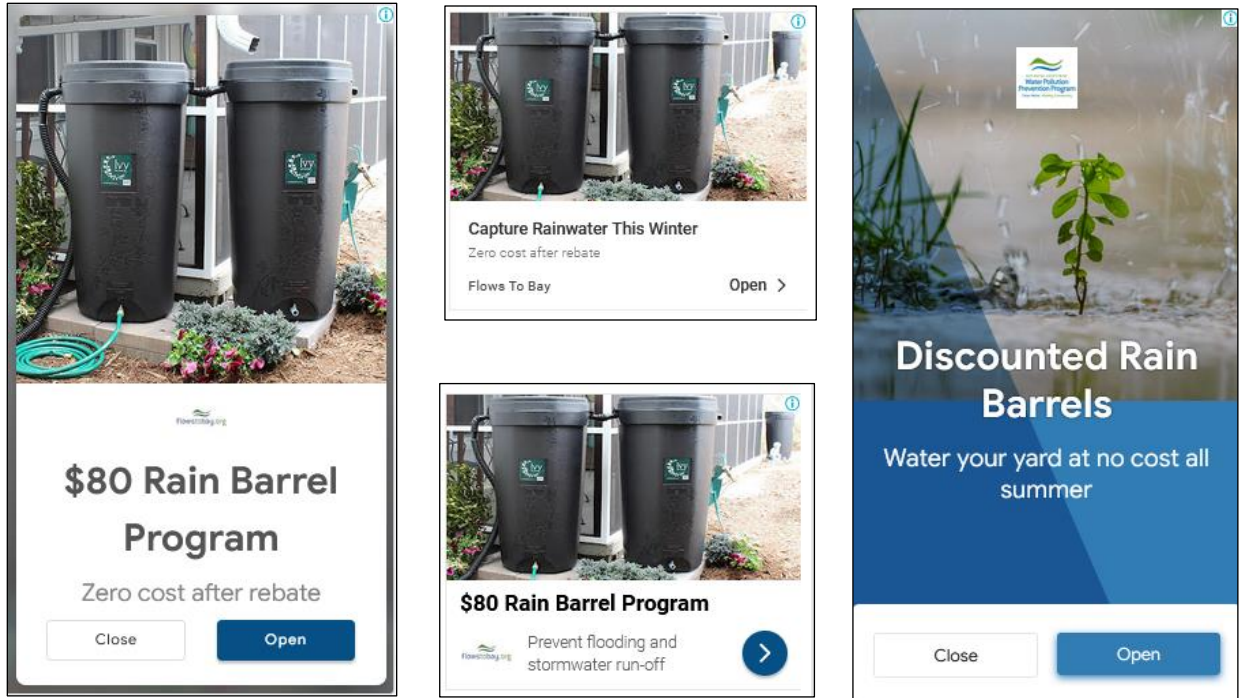


Figure 7-2. Examples of the rain barrel program ads for the Google Ads campaigns

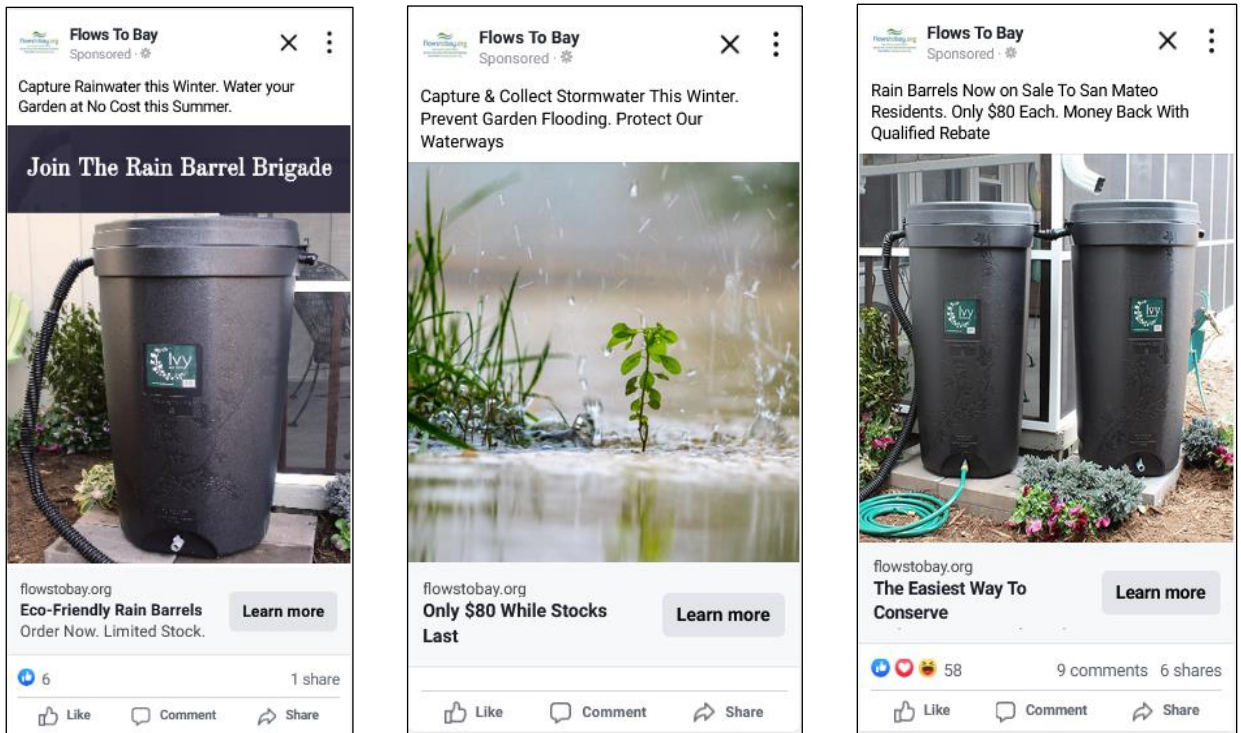


Figure 7-3. Examples of the rain barrel program ads for the Meta Ads campaigns

A press release titled “Popular San Mateo Countywide Rain Barrel Program Returns for a Third Year” was sent to local media outlets, including *San Mateo Daily Journal*, *Everything South City*, and the *San Francisco Chronicle* and local TV stations including KGO and KPIX to announce the event. A post-event release titled “San Mateo County Residents Embrace Rain Barrel Program to Boost Water Conservation and Stormwater Resilience,” was also sent to the local media list. The releases included a [press kit](#) with images and a rain barrel fact-sheet.

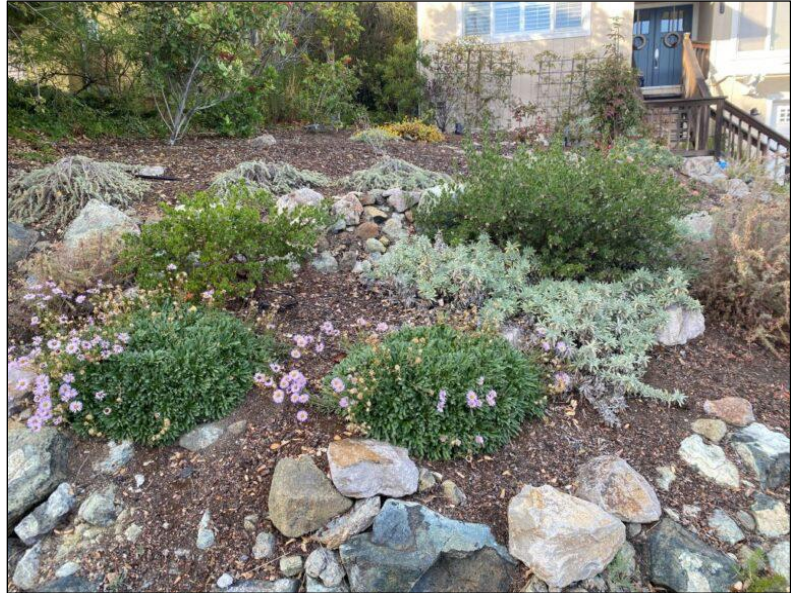


Figure 7-4. A San Mateo resident and rain barrel program participant’s newly installed rain barrel and nearby native landscaping, which was featured in our December 2023 blog: “Let’s Celebrate The Holidays With Pollution-Free Waterways”

Rain Garden Outreach Program

In FY 2023/24, SMCWPPP continued outreach efforts to promote the [Rain Garden rebate](#) as part of the BAWSCA Lawn Be Gone! (LBG) lawn conversion rebate program. The rebate provided a flat rate amount of \$300 to residents in the participating BAWSCA member agency jurisdictions where approved rain gardens are installed with a qualifying lawn replacement project. Our efforts throughout the fiscal year included:

- Distributing an e-newsletter to continue our drip marketing campaign with attendees of the FY 2022/2023 “Sustainably-Stylish Rain Gardens” webinar to maintain engagement with residents involved in the actions related to the webinar and encourage using the relevant BAWSCA rebate.
- Continuing to promote an educational [animated video](#) on rain gardens and their benefits (that was created in FY 2022/23) on the website, social media and in our newsletters (Figure 7-5).
- Continuing to add to the online [video resources section on the rain garden web page](#) (Figure 7-6).
- Publishing information about the rebate in e-newsletters and blogs.
- Posting rain garden-related posts on social media (Figure 7-7).
- Partnering with PIP members who are also BAWSCA rain barrel rebate participating agencies to help promote the rain garden rebate.

Residents were directed to the rain garden webpage on flowstobay.org to get more information on rain gardens and their benefits. Interactive “before” and “after” photos demonstrate how the rebate can be implemented in residents’ yards, along with information about the Lawn Be Gone! (LBG) Rebate and the rain garden addition, and additional resources. The web page can be viewed here: www.flowstobay.org/rain-gardens.

The results of the campaign included:

- One rain garden rebate application pending approval.
- 963 pageviews on the campaign landing page.
- 203 total downloads of materials on the campaign landing page, including the “Rebate Program Terms and Conditions” and “Rain Garden Rebate: Pre- and Post-Conversion Site Inspection Checklist”
- 469 impressions from campaign promotional materials.
 - Includes: Educational YouTube video about rain gardens, one e-newsletter, and one blog.

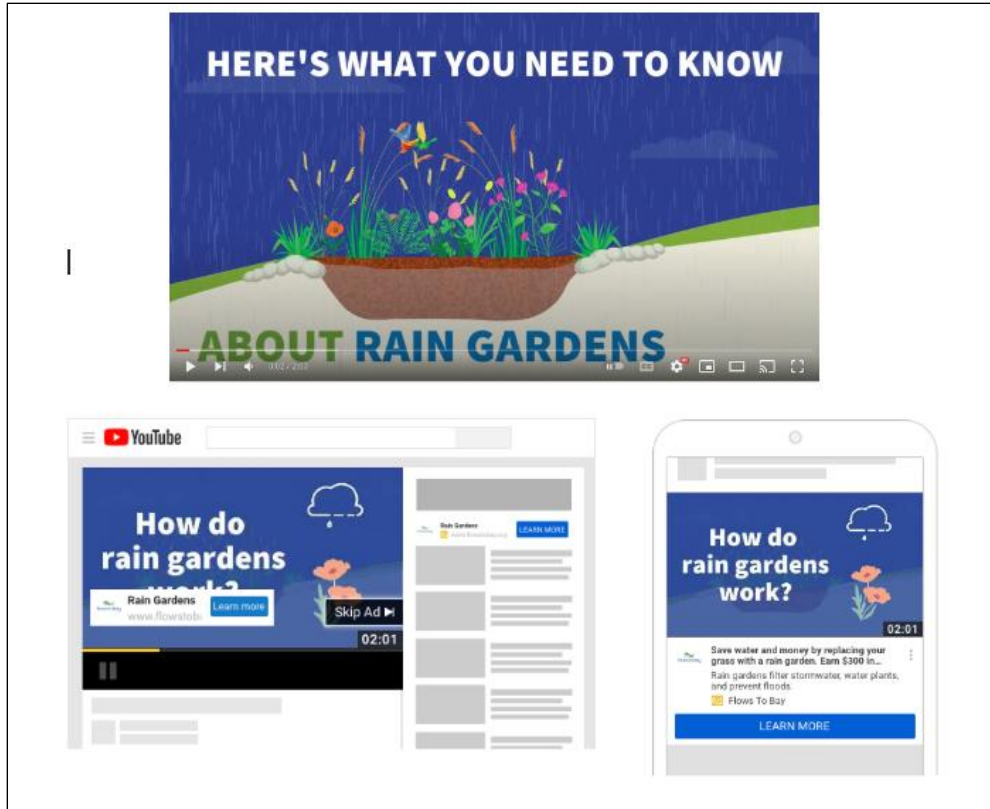


Figure 7-5. Examples of promotion for the rain garden educational video

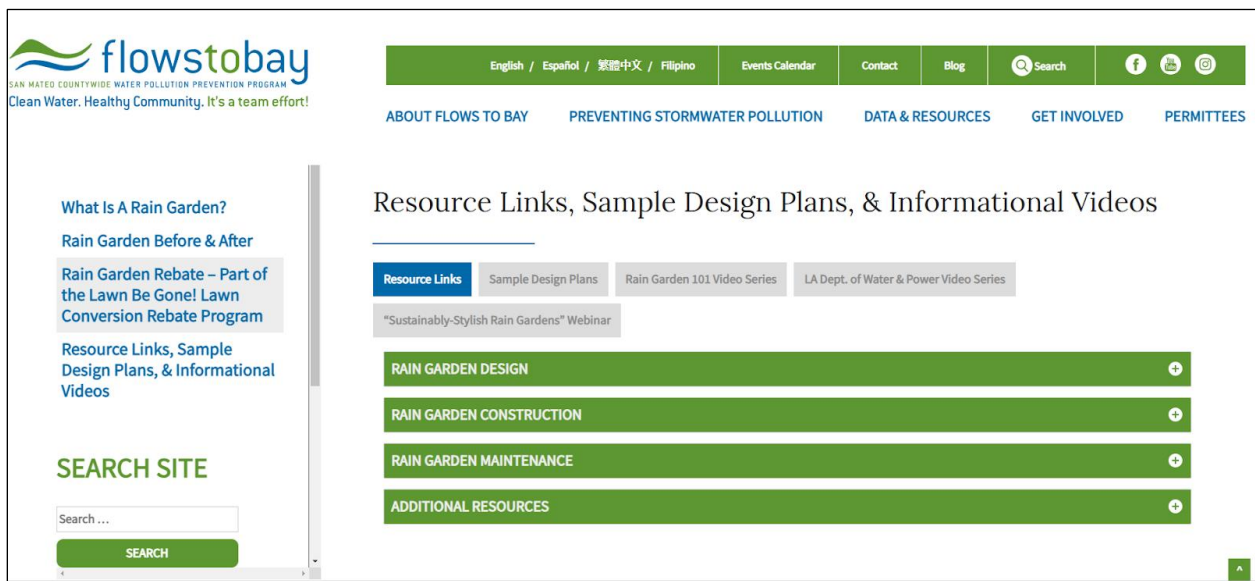


Figure 7-6. Online website resources, including past webinars and guides

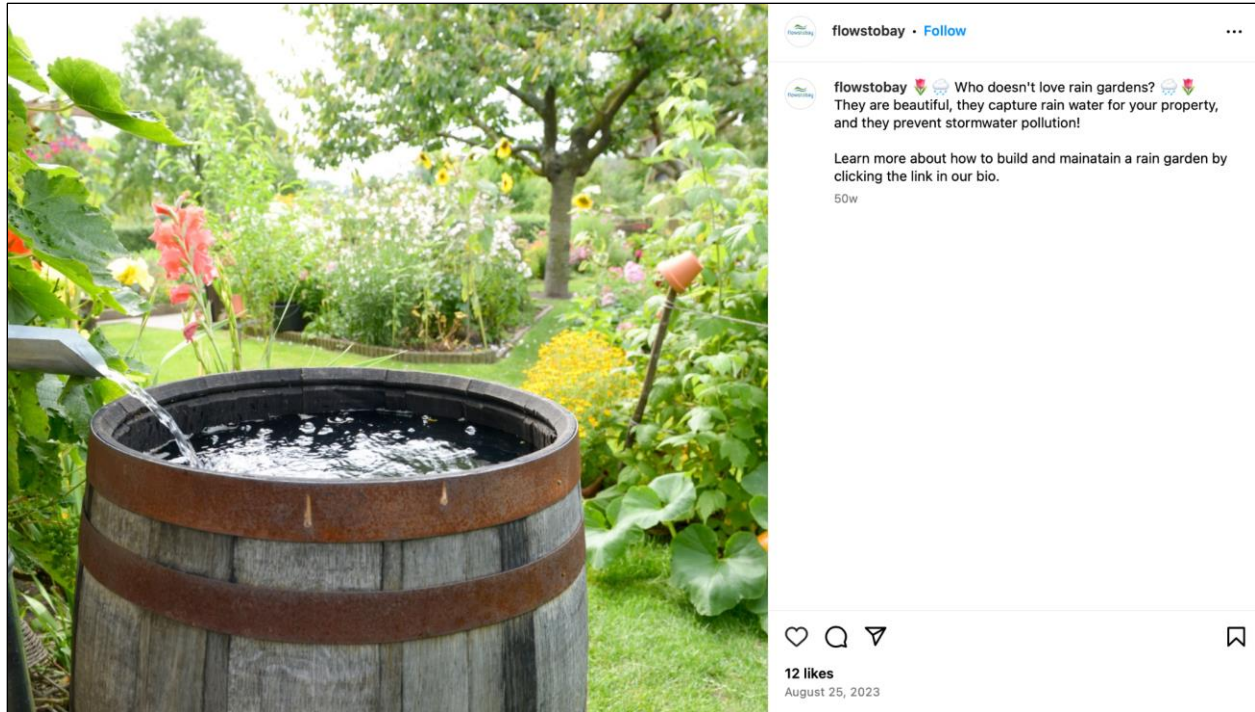


Figure 7-7. Social media post about rain gardens

Green Streets Stewards Pilot Program Continuation

The goal of Green Streets Stewards (GSS) Program was to pilot a foundational program to support current and ongoing green infrastructure (GI) facility maintenance needs across different jurisdictions while also engaging and educating residents, students, and community groups on the function and value of GI. The pilot began in FY 2020/21 in partnership with the UC Master Gardeners of San Francisco and San Mateo County, aimed to educate residents and community groups on the function and value of GI, and to promote sustainable stormwater management by empowering residents and community groups to perform basic maintenance on their local GI in cooperation with the local municipal government agencies. The pilot program operated through FY 2022/23 with two events held at Integrated Safe Routes to School and Green Streets Pilot Program bioretention projects located in the City of Half Moon Bay and the City of Pacifica. In total, the program supported 11 events over three active program fiscal years. Due to program resource constraints under MRP 3.0, the pilot program was put on hold starting in FY 2023/24.

C.7.c. Stormwater Pollution Prevention Education

SMCWPPP continued to use social media, the flowstobay.org website, and the electronic newsletter to promote stormwater pollution prevention messages.

Social Media

SMCWPPP continued to maintain the social media platforms of Facebook and Instagram. These platforms were used as a tool for two-way communication and have continued to be an effective method to engage with residents. With an already established Facebook presence consisting of over 26K followers and an Instagram following of over 1.1K, we focused our efforts on maintaining engagement and followership on both platforms.

Facebook and Instagram were used to publicize stormwater issues, watershed characteristics, and stormwater pollution prevention alternatives. The platforms were also used to inform the public of online environmental outreach events, to promote a shift towards incorporating sustainable behaviors into daily lifestyles, and to provide environmental and marine news relevant to San Mateo County pollution prevention. The accounts were monitored on a weekly basis throughout the fiscal year. As part of the overall effort to enhance social presence and engagement with followers, we invited conversation and responded to residents' questions—often directing them to resources on our website.

The following is a breakdown of tasks and evaluation metrics associated with social media activity for FY 2023/24:

- Continued utilizing Facebook as a two-way communication tool to share and exchange information on pollution prevention messages between SMCWPPP residents, businesses, nonprofits, and community stakeholders within San Mateo County. Specific program messages included watershed protection, water pollution and Bay area marine news, wash water pollution prevention, the benefits of GI, household hazardous waste, and used motor oil & filter recycling content.
- Continued to utilize Facebook (Figure 7-8) and Instagram (Figure 7-9) as the SMCWPPP website's advertising platform to further promote messages.

Facebook metrics:

- Maintained over 26.3K followers.
- Garnered 654 total page visits (number of times people viewed our page).
- Reached a total of 29,291 people (number of people who had content from our page enter their screen).
- Garnered 423 interactions (likes, comments, and shares).
- Published a total of 155 Facebook posts.

Instagram metrics:

- Maintained over 1.1K followers.
- Garnered 347 total page impressions (number of people that viewed our page).
- Garnered 248 interactions (likes, comments, and shares).
- Received 27 saves on posts.
- Received 108 website clicks from posts.
- Published a total of 129 Instagram account posts.
- Published a total of 49 Instagram story posts.

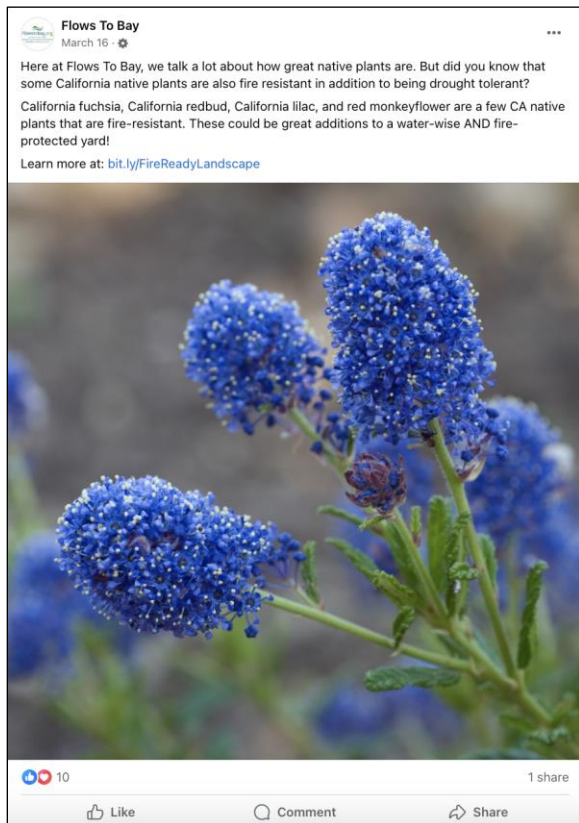
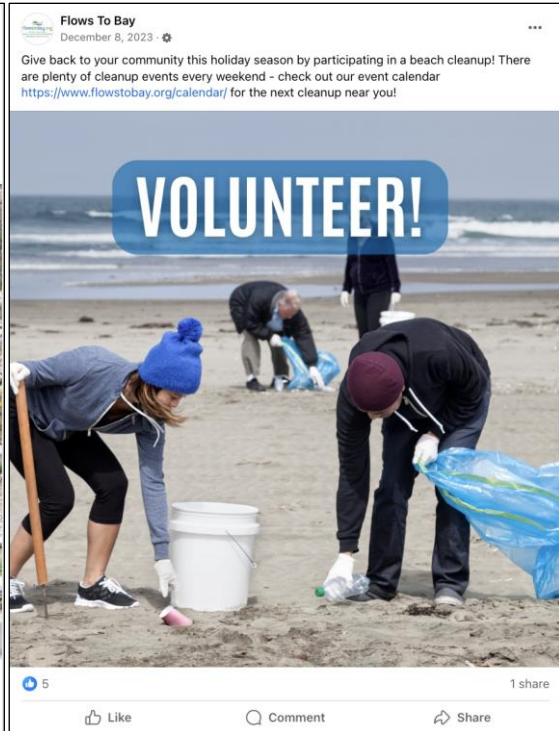
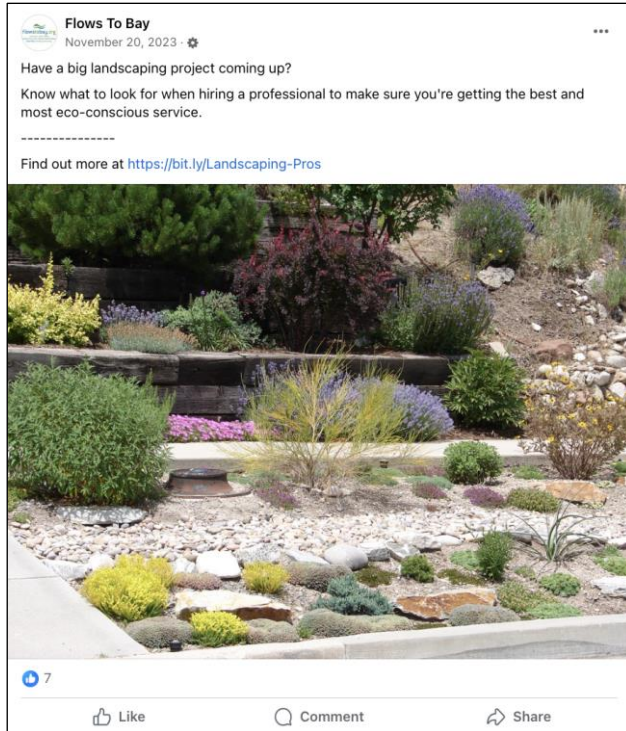


Figure 7-8. Examples of FY 2023/24 Facebook Posts

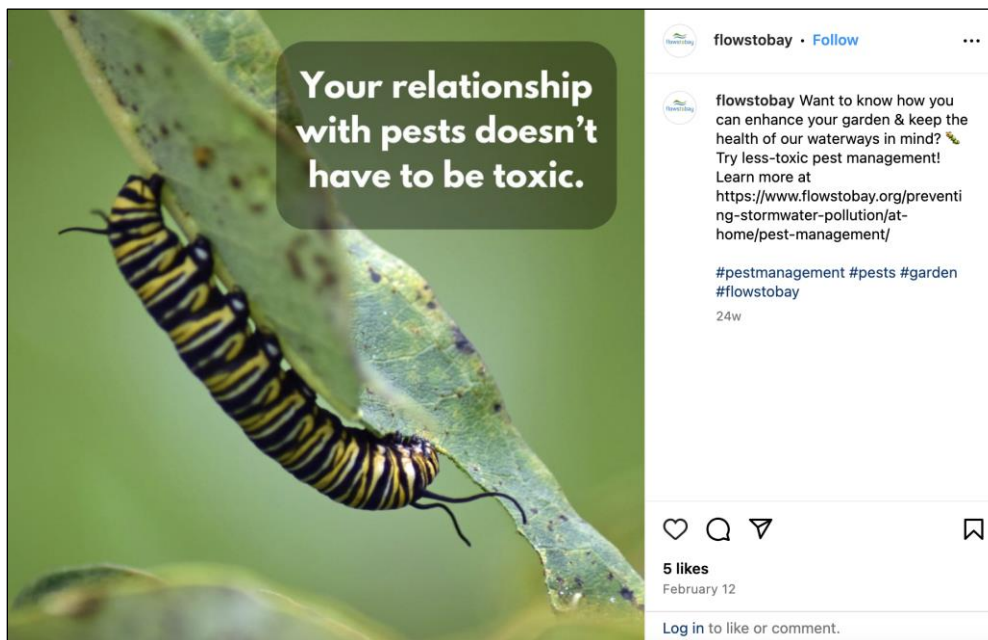


Figure 7-9. Examples of FY 2023/24 Instagram Posts

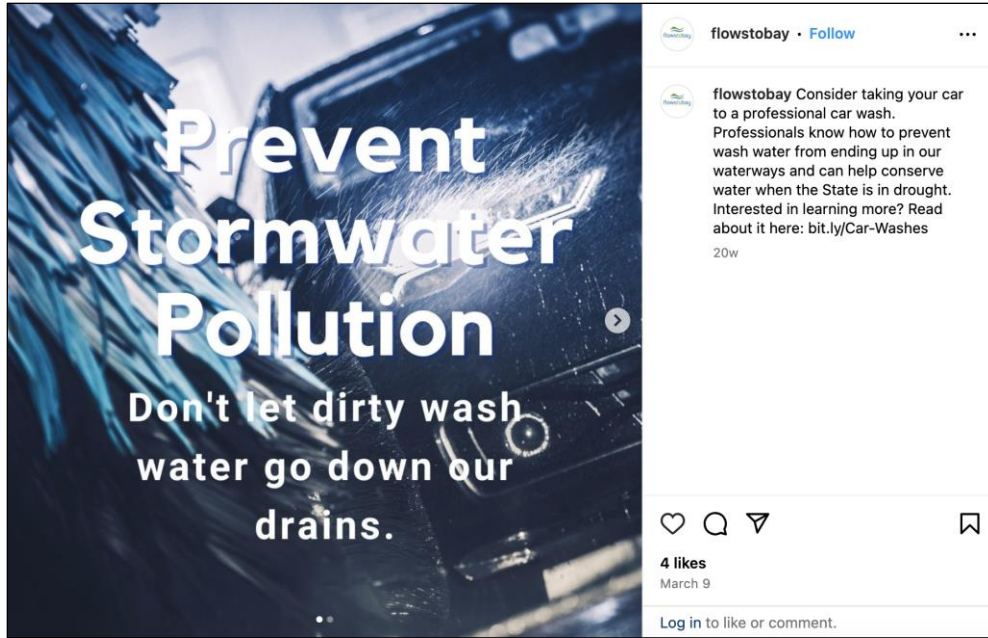


Figure 7-9. Examples of FY 2023/24 Instagram Posts (Continued)

Newsletter

The SMCWPPP newsletter is used to publicize stormwater issues, watershed information, upcoming webinars, and stormwater pollution prevention options to residents. A total of seven e-newsletters were sent during FY 2023/24. Four e-newsletters were sent to an average of 3,275 recipients of our community newsletter subscriber list, which reached a total of 4,559 subscribers—adding a total of 362 new subscribers. Those four e-newsletters achieved an average open rate of 57%, an average click rate of 3.8%, and an average 6.7% clicks per unique opens rate¹; the government-industry averages 40.6% open rate and 4.6% click rate².

Three e-newsletters were sent to targeted segments involved in a campaign (average of 132 recipients), which included a) people placed on a waitlist from last FY's (2022/23) Bulk Rain Barrel Program, b) attendees of the May 2023 Rain Garden Webinar as part of a drip-marketing campaign, and c) all participants of the FY 2023/24 Bulk Rain Barrel Program. These three e-newsletters performed at an average open rate of 78%, an average 32% click rate, and an average 39% clicks per unique opens rate. Table 7-3 details the data for each e-newsletter distributed to the community newsletter subscriber and campaign lists.

Table 7-3. SMCWPPP E-Newsletter Metrics for FY 2023/24.

Subject Line	Content	Send Date	Total Recipients	Open Rate	Click Rate	Clicks Per Unique Opens.
Eco-Friendly Weeding Tips On Sept. 10	Eco-Friendly Weed Management: Workshop (Limited) and Webinar September 10th at 1:00-2:30PM	08/27/2023	2,749	63.15%	3.27%	5.18%
The 2023 Rain Barrel Bulk Sale Is Here!	Information about the 2023 Rain Barrel Bulk Program and How to Order <i>[sent to waitlist from last FY]</i>	09/21/2023	152	82.24%	48.30%	58.40%
The 2023 Rain Barrel Bulk Sale Is Here!	Information about the 2023 Rain Barrel Bulk Program and How to Order <i>[sent to segment of subscriber list]</i>	09/28/2023	2,722	59.88%	5.25%	8.77%

¹ Clicks per unique opens refers to those who clicked / opened.

² Source from [August 2024, Mailchimp](#)

Subject Line	Content	Send Date	Total Recipients	Open Rate	Click Rate	Clicks Per Unique Opens.
Last Week To Get Discount Rain Barrels!	<ul style="list-style-type: none"> ▪ Order Your Discounted Rain Barrel Before October 22nd! ▪ How Does The Rain Barrel Program Work? ▪ Rain Barrel Map ▪ Rain Barrel Bulk Program FAQ <p><i>[sent to full subscriber lists]</i></p>	10/16/2023	4,426	41.57%	2.69%	6.47%
Your Sustainably-Stylish Rain Garden	<ul style="list-style-type: none"> ▪ Rebate Related to Rain Gardens ▪ Resources on Rain Gardens & Rebates Web Page 	01/02/2024	66	66.67%	9.09%	13.64%
Rain Barrel Program Survey and Raffle!	<ul style="list-style-type: none"> ▪ Short Survey for Rain Barrel Bulk Program ▪ Rebate Information ▪ Upcoming Rain Barrel Installation Workshop at Little Cunha Farm ▪ Rain Barrel Map ▪ Resources on Rain Barrels & Rebate Program Web Page 	01/20/24	177	85.31%	37.85%	44.37%
Feb. 10th Rain Barrel Installation Workshop	<ul style="list-style-type: none"> ▪ Upcoming Rain Barrel Installation Workshop at Little Cunha Farm ▪ Results from Third Annual Rain Barrel Bulk Program ▪ Resident's Rain Barrel Story ▪ Rain Barrel Map 	02/06/24	3,203	63.50%	4.10%	6.50%

SMCWPPP Website

This fiscal year, we linked or referenced content on our website through our various communication mediums, such as Facebook, Instagram, e-Newsletter, blogs, during webinars and workshops for resources. We kept our [online community events calendar](#) active. See Appendix 7B for blog and analytics data.

During FY 2023/24, the following updates were made to the flowstobay.org website:

- Posted five newly developed Green Infrastructure Videos to several pages on the website, including the [Green Infrastructure](#), [Data & Resources](#), [Outreach Materials](#), [Sustainable Streets](#)

[Master Plan](#), [Safe Routes to School](#), [Schoolyard Greening & Rainwater Resilient Schools](#), [Sustainable and Climate Ready Schools Partnership Network](#), [School Site Improvements](#), and [Rain Gardens & Rebate Program](#) pages (September 2023). The videos were also uploaded as a series in a new '[Green Infrastructure](#)' playlist on the Flows To Bay Youtube (September 2023) and shared in a green infrastructure blog (See [San Mateo County is Growing from “Gray” to “Green”](#)) (March 2024).

- Updated the box link on the [Home](#) page of the website from the "What is a Watershed" page to the "What is Green Infrastructure" page to increase attention to this important stormwater topic (September 2023).
- Created a new [On the Coast](#) page to focus on stormwater prevention pollution in our coastal communities. The page features a new header image, copy co-produced with the County Sustainability Department, and graphics (available in English, Spanish and Chinese) from the new sign erected on the recently replaced Miramar Bridge. The “Eating Fish From the Pacific Ocean & SF Bay” page was also renamed to “Safe Fish Eating Guide” to create space for the new On the Coast page on the website dropdown menu and improve overall user experience (October 2023).
- Uploaded new versions of the Vehicle Service BMP Fact Sheet in English, Spanish and Chinese to the [Automotive Facilities](#) page (October 2023).
- Uploaded new versions of the Food Service BMP Fact Sheet in English, Spanish and Chinese to the [Food Facilities](#) page (October 2023).
- Uploaded a new version of the Mobile Fueling BMP Fact Sheet to the [Automotive Facilities](#), [Mobile Cleaners and Businesses](#), [Commercial Businesses](#), and [Construction Best Practices](#) pages (December 2023).
- Uploaded a new version of the “How Your Business Can Prevent Stormwater Pollution” Booklet in English, Spanish and Chinese to the [Commercial Businesses](#) page (December 2023).
- Uploaded a new version of SMC Mosquito & Vector Control District’s Rain Barrel Mosquito Prevention Guidelines to the resources section on the [Rain Barrels & Rebate Program](#) page (February 2024).

During FY 2023/24, the flowstobay.org website had the following results (Figure 7-10):

- 58,338 sessions (8.8% decrease from FY 2022/23).
- 42,591 new users (14.2% decrease from FY 2022/23).
- 98,729 page views (5.6% increase from FY 2022/23).
- 1.36 sessions per user (5.2% increase from FY 2022/23).
- 1.69 pages viewed per session (15.9% increase from FY 2022/23).
- 00:00:56 average session duration (25.3% decrease from FY 2022/23).
- 48.85% bounce rate (positive change of 23.01% decrease from FY 2022/23).
- 9,653 file downloads (1.2% increase from FY 2022/23).
- 3,046 outbound link clicks (39.6% decrease from FY 2022/23).

Event name	+	↓ Event count	Total users	Event count per user	Total revenue
		264,059 100% of total	42,983 100% of total	6.15 Avg 0%	\$0.00
1	page_view	98,729	42,946	2.30	\$0.00
2	session_start	58,338	42,936	1.36	\$0.00
3	user_engagement	51,629	25,720	2.06	\$0.00
4	first_visit	42,591	42,911	0.99	\$0.00
5	file_download	9,653	3,393	2.85	\$0.00
6	click	3,046	2,232	1.37	\$0.00

Figure 7-10. Google Analytics metrics for FY 2023/24

C.7.d. Public Outreach and Citizen Involvement Events

SMCWPPP directly participated in 11 public outreach and citizen involvement events in FY 2023/24 in order to reach a wide array of residents in different parts of the County (Figure 7-11 and Table 7-4). SMCWPPP used online channels, such as Facebook, Instagram, the SMCWPPP website, and if applicable, paid digital ads and e-newsletter to promote events and gather volunteers. In total, events had a reach of 286,881 with 4,828 event attendance.

The event goals are:

- Educate residents through personal interaction and educational materials.
- Build our existing database of residents interested in stormwater issues.
- Provide a platform for residents to engage with SMCWPPP messages.
- Develop outreach partnerships with County agencies, NGOs, and CBOs.
- Promote local cleanup events, such as Coastal Cleanup Day.

The following SMCWPPP outreach items are provided, upon request, to Permittees, organizations, and residents in San Mateo County (not including the less-toxic pest control items listed in section C.9.h.ii).

- “You Are the Solution to Water Pollution” pamphlet (English and Spanish)
- Stormwater tip card (English, Mandarin, and Spanish)
- Rain barrel tip card
- Pet waste tip card (English, Mandarin, and Spanish)
- Microplastics tip card (English, Mandarin, and Spanish)
- Litter tip card (English, Mandarin, and Spanish)
- BAWSCA rain barrel rebate packet
- BAWSCA Lawn Be Gone! & Rain Garden Rebate packet
- “Keep Car Wash Pollution out of the Storm Drain” pamphlet
- “Tarp Your Load” flier (English front, Spanish back)

- Two children’s activity books: “Pest or Pal” (OWOW – Our Water, Our World) and “Discover Storm Water”
- Green Stormwater Infrastructure Fact Sheet
- Dog waste bag canister
- Branded metal straw with rubber tip and cleaner
- Recycled water bottle pens
- Branded reusable bags
- Sea animal stickers
- Fish erasers

In December 2023, SMCWPPP printed 900 English copies of an updated “How Your Business Can Prevent Stormwater Pollution” booklet for distribution to nine municipalities within the county to bolster their stormwater education and outreach efforts.

In preparation of the San Mateo County Mosquito & Vector Control District tabling event on June 15, 2024 in Burlingame, C/CAG developed an 18x24 booth poster that included a depiction of a map with pin drops for places in the county where residents could find various stormwater systems in local neighborhoods. The sites depicted on the map reflect real green infrastructure sites in San Mateo County derived from the Green Infrastructure Story Map that can be found on the [Green Infrastructure](https://www.flowstobay.org) page on the [flowstobay.org](https://www.flowstobay.org) website (the poster is included in the outreach event images below).

Table 7-4. FY 2023/24 Public Outreach and Citizen Involvement Events and Metrics

Dates	Event Location	Event Name	Type of Event	Estimated Event Attendance	Category
July 18, 2023	On-site/ In-person SMC County Office of Education, Redwood City	Tabling Event, Teacher Institute	Tabling	+50	Public Outreach
September 10, 2023	Hybrid San Mateo Arboretum in Central Park, San Mateo	IPM Webinar and Workshop, “Eco-Friendly Weed Management”	Webinar & Workshop	35	Resident Involvement + Public Outreach

Dates	Event Location	Event Name	Type of Event	Estimated Event Attendance	Category
September 23, 2023	On-site/ In-person Various - San Mateo County	Coastal Cleanup Day	Volunteer effort	4,146	Resident Involvement
November 4, 2023	On-site/ In-person (1949 Pacific Blvd, San Mateo)	Rain Barrel Distribution Event, City of San Mateo	Rain Barrel Distribution	177 buyers	Resident Involvement + Public Outreach
February 7, 2023	On-site/In-person Cunha Middle School, City of Half Moon Bay	Rain Barrel Classroom Presentation, Cunha Middle School, City of Half Moon Bay	Presentation	60 students	Resident Involvement + Public Outreach
February 10, 2023	On-site/In-person Little Cunha Farm, City of Half Moon Bay	Rain Barrel Installation Workshop, Little Cunha Farm, City of Half Moon Bay	Installation	26	Resident Involvement + Public Outreach
April 27, 2024	Remote/Virtual	County Sustainability Department - Youth Climate Ambassador Program: Case Study Capstone Presentations	Presentation	25	Public Outreach
April 30, 2024	On-site/In-person 101 Twin Dolphin Drive, Redwood City,	Speaker Panel, Climate Ready School Symposium, Redwood City	Presentation	87 (including 48 students from 9 high schools)	Public Outreach
May 11, 2024	On-site/In-person Outdoor Supply Hardware	Tabling Event, Outdoor Supply Hardware (Millbrae)	Tabling	28	Public Outreach

Dates	Event Location	Event Name	Type of Event	Estimated Event Attendance	Category
June 8, 2024	On-site/In-person The Home Depot	Tabling Event, The Home Depot (San Mateo)	Tabling	44	Public Outreach
June 15, 2024	On-site/In-person 1351 Rollins Rd, Burlingame	Tabling Event, Mosquito Vector Control Grounds (Burlingame)	Tabling + Rain Barrel Mosquito Prevention Tips demonstration	+150	Resident Involvement + Public Outreach



Figure 7-11(a)



Figure 7-11(b)



Figure 7-11(c)

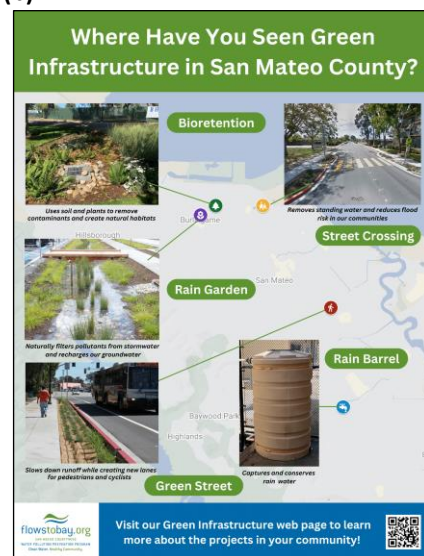


Figure 7-11(d)



Figure 7-11(e)



Figure 7-11(f)



Figure 7-11(g)



Figure 7-11(h)

Figure 7-11. Variety of images from outreach events throughout the fiscal year. a) Community participants listen to the pre-installation talk given by the rain harvest specialist at the Little Cunha Farm Hands-On Rain Barrel installation event in Half Moon Bay on February 10, 2024. b) Community participants prepare the blue barrels for rain capture and installation at the Little Cunha Farm Hands-On Rain Barrel installation event in Half Moon Bay on February 10, 2024. c) A Flows to Bay rain harvest specialist and Flows to Bay rep get ready to chat with visitors and demonstrate how to prevent mosquitoes from entering rain barrels at San Mateo Mosquito + Vector Control event on June 15, 2024. d) A PDF of an interactive poster designed to engage visitors that was displayed at the San Mateo Mosquito + Vector Control event on June 15, 2024. e) A visitor at an IPM tabling event at a San Mateo County hardware store. f) Promotion for the public event on eco-friendly weed management at San Mateo Arboretum Society on September 10, 2023. g) Sign at the entrance to the City of San Mateo pick-up venue for the annual Rain Barrel distribution event on November 4, 2023. h) Rain Barrel purchasers begin to arrive to pick up one of 297 rain barrels at the annual Rain barrel distribution event on November 4, 2023.

C.7.e. Watershed Stewardship Collaborative Efforts

Rain Barrel Rebate Program

During FY 2023/24 SMCWPPP continued its partnership with the Bay Area Water Supply and Conservation Agency (BAWSCA) to promote the countywide rain barrel and lawn replacement/rain garden rebate programs and inspire San Mateo County residents to join the rainwater harvesting movement and to help promote other water conservation events. The program subsidizes the cost of purchasing a rain barrel by providing rebates up to \$200.

In FY 2023/24 BAWSCA reported a total of 118 rebate applications and 186 rain barrel installations for its service area. To date, over 3,460 rain barrels have been installed in San Mateo County under the rebate program. See Section C.7.b. for additional details.

C.7.f. School-Age Children Outreach

Schoolyard Rain Barrel Installation (Greening) Projects

To engage school communities and advance the Schoolyard Greening Initiative developed over three years ago, C/CAG has continued to explore tactical Green Infrastructure (GI) on school campuses with an educational component. GI is a term that's used broadly to describe a more effective and resilient approach to managing stormwater runoff and pollutants associated with runoff through engineered bioretention systems. It involves capturing, storing, and treating rainwater where it falls, using special soils and plants that filter, absorb and evapotranspire water, mimicking a more natural water cycle.

In FY 2023/24, C/CAG continued the momentum of the Schoolyard Greening Initiative to continue the aims of the project and educate schools administrations, teachers, and parents about the benefits of Green Infrastructure on school campuses, by sponsoring a rain barrel installation in February 2024 at Cunha Intermediate School's Little Farm in Half Moon Bay (Table 7-5; Figure 7-12).

C/CAG supplied the barrels and provided hardware, learning materials, and snacks. The installation was accompanied by a community workshop led by C/CAG's contracted rain harvest specialist, Chris Corvetti. During the workshop, Corvetti discussed rainwater capture, stormwater pollution prevention, and the benefits of rain barrels in mitigating runoff. Corvetti also covered three types of rain barrel setups and encouraged the students and parents in attendance to apply for the relevant BAWSCA rebate.

The goals of installation projects such as this are to:

- Conduct hands-on community-based events that engage schools, their students, and surrounding communities while educating and demonstrating how residents may install similar projects on their property.
- Provide climate resilience benefits of GI to school campuses which may include flood mitigation, reducing urban heat island effects, and increasing natural habitat for pollinators and birds.
- Create an outdoor educational resource that may be used in classroom curricula to discuss the water cycle, environment, watersheds, and effects of climate change.

The installation workshop was mentioned in two newsletters, which received a combined 2,142 opens (reach). The installation event was also promoted on Flows To Bay's social media accounts (Instagram and Facebook), an event on the Facebook account, on the website's Events Calendar, and was also placed on

the website’s homepage as a main call-to-action. The teacher involved (Sonia Meyers) also promoted the event with her school and network. See Figure 7-13 for an example promotional image prepared for the February 10th installation workshop.

Lastly, *Half Moon Bay Review* [published an article](#) on February 6, 2024, to feature The Little Cunha Farm and encourage attendance at the February 10th workshop (Figure 7-14).

On February 24, 2024, we received an email from Sonia Meyers that included appreciation for the time involved with the installation and the positive impact she’s already seeing. Part of that email is included below:

“Thank you so much for all the help in setting up the rain barrels on our lil farm.

This past week our school shut off the water on our farm (not sure why), but because we had the rain barrels fully functioning I was able to water all the plants. I am totally amazed at all the water that was stored in all those barrels! Rather incredible!

This is truly a system that will work and is functional for our farm and for educational purposes.”

Table 7-5. Greening Schoolyards Program Reach

School	Grades Level	Approximate Number of Students Reached	Details
Little Cunha Farm/Cunha Middle School	Grades 6-8	60	<ul style="list-style-type: none"> Classroom presentation to students
Little Cunha Farm/Cunha Middle School	Grades 6-8	26	<ul style="list-style-type: none"> Pre-installation workshop with participants. Hands-on installation of two 110 Gallon 2-barrel BlueBarrel systems and a 100 Gallon 2-barrel Ivy Daisy Chain system



Figure 7-12. Photos captured during the hands-on rain barrel installation workshop at Cunha Intermediate School's Little Farm in Half Moon Bay.



Figure 7-13. Promotional image prepared for the February 10th installation workshop

Big ideas at Cunha's little farm

Rain barrels the latest addition to outdoor learning space

By Peter Tokofsky Feb 6, 2024



The Cabrillo Unified School District has been recognized by the U.S. Department of Education for providing diverse outdoor learning opportunities, including the Little Farm at Cunha Intermediate School.

Anna Hoch-Kenney / Review

Figure 7-14. Part of the article Half Moon Bay Review published on February 6, 2024 to help advertise the local and upcoming installation workshop on February 10, 2024.

Stormwater Pollution In-Class High School Presentation

Flows to Bay receives multiple inquiries for assistance with materials or presentations on stormwater pollution prevention each year. Ahead of the hands-on rain barrel workshop and installation, SMCWPPP conducted a presentation on Stormwater Pollution Prevention to 60 students at Cunha Intermediate School in Half Moon Bay. The presentation focused on stormwater pollution prevention and encouraged the students to imagine how they might prevent pollution at home and at school. Then rainwater harvesting was introduced as part of the solution and the instructor brought the students out to the site of the upcoming installation to discuss how the barrels would be connected and how the school would be able to use the water at the surrounding farm. Some of the students also helped carry bags of gravel and the barrels out to the site for the community installation. The presentation and activity allowed us to share our message about watershed protection, pollution prevention, and GI with these impressionable students and the communities around them.

County Office of Education Sustainable and Climate Ready Schools Initiative

In FY 2021/22, SMCWPPP was a supporting partner with the [San Mateo County Office of Education](#) to implement a comprehensive, standards-aligned learning unit that focused on the environmental, social, and economic impacts of stormwater pollution and watershed management. Flows To Bay served in the role of community-based partner, assisting with stormwater content and being available as a resource for teachers, and conducting in-class presentations as requested.

SMCWPPP will continue to support the Resilient San Carlos Schoolyard project as deemed necessary and appropriate to ensure progress towards project implementation. This includes updating the [flowstobay.org](#) website to house the program information, assistance with program collateral (as feasible/useful), outreach, and providing promotion. C/CAG staff will also coordinate with the County Office of Education on the Teacher Fellowship program and support community grant projects as needed.

In FY 2023/24, C/CAG staff have continued to engage with the County Office of Education on advancing stormwater-related partnerships for facility improvements through the COE's Sustainable and Climate Ready Schools Initiative.

In July 2023, SMCWPPP Program Director Reid Bogert attended a Teacher Institute event held by COE to advance partnerships to install rain barrels at schools for participating teachers. In preparation of the event, SMCWPPP staff developed a new schoolyard greening flier that the director shared with event attendees.

On April 27, 2024, SMCWPPP Program Director Reid Bogert attended the Youth Climate Ambassador Symposium in collaboration with the [County Sustainability Department](#) via a remote meeting, which involved case study capstone presentations and had 25 attendees. The projects involved receiving advice from Reid about rainwater harvesting and connecting them with BlueBarrel Rainwater Catchment System for installation-related supplies (Figure 7-15). See Appendix 7D for more details on the projects presented at the event.

On April 30, 2024, SMCWPPP Program Director Reid Bogert was one of three panelists for a session on student centered leadership at the annual Climate Ready School Symposium, which was in collaboration with the [San Mateo County Office of Education](#) - Sustainable and Climate Ready Schools Initiative (Figure 7-16). The event was in Redwood City and had 87 attendees (including 48 students from nine high schools).

The other panelists were Jennifer Gaboury (Chief Operations Officer, San Carlos School District) and Stephanie Ogden (Principal, Redwood High School), and it was facilitated by Kristen Gracia (Superintendent, Menlo Park City School District).

The goals of the session were to:

- Identify how schools can champion sustainability in the service of students.
- Spotlight how to leverage funding opportunities to implement green landscapes and other healthy school environments.
- Share best practices for systems change at the site and district level.

The high-level topics the SMCWPPP Program Director discussed during his presentation were:

- Resilient Schoolyards

- Green Infrastructure
- Site Scale Green Infrastructure in the County
 - Rain Barrels
 - Rain Garden
- Resilient San Carlos Schoolyards - Final Report
- Street Scale Green Infrastructure in the County
 - Safe Routes to Schools/Green Infrastructure
 - Countywide Sustainable Streets Master Plan
- Regional Scale Green Infrastructure
 - Regional Multi-Benefit Stormwater Capture Projects and School Project Concepts

The complete list of topics and relevant projects discussed by the Program Director during his presentation can be found in Appendix 7D, along with images of several of the projects discussed.

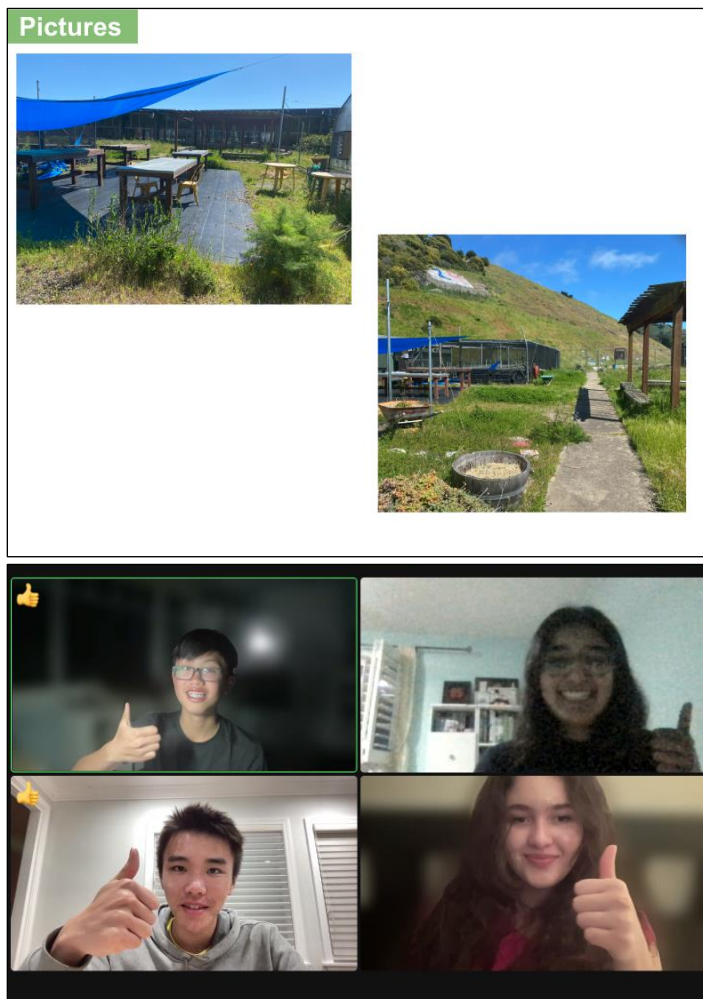


Figure 7-15. Photos from the April 27, 2024 Youth Climate Ambassador Symposium presentations.

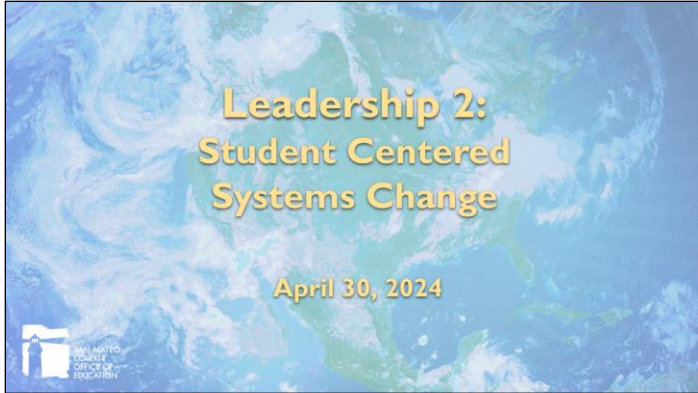


Figure 7-16. Image from the April 30, 2024 Climate Ready School Symposium presentation.

C.7.g.iii. Reporting Table

Table 7-6 provides brief descriptions of the current year’s outreach campaigns by type of outreach program implemented, per provision C.7.g.iii. reporting requirements. This information is also provided in individual San Mateo County Permittee Annual Reports.

Table 7-6. C.7.g.iii. Reporting Table

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of Outreach Campaigns or Events Occurring during Each Permit Year, if Applicable				
		FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26	FY 2026/27
C.7.a. Outreach Campaigns	<p>SMCWPPP conducted several stormwater pollution prevention outreach campaigns covering water pollution, water conservation, water harvesting, wash water pollution, pool and spa discharge, pesticides, and trash and litter reduction, including:</p> <ul style="list-style-type: none"> ▪ Multiple weekly messages on social channels, Facebook, and Instagram, aimed at residential and business audiences; ▪ A monthly newsletter aimed at residents containing information on water harvesting, rain gardens, and rebates for installations; ▪ Several blogs covering topics such as rain barrel and rain garden installation how-to, pollution prevention, and water conservation aimed at residents, school communities, and businesses; ▪ Live educational workshop and webinar on Zoom covering IPM topics aimed at residents; ▪ An educational video on How Rain Gardens Work promoted on social, in newsletters, on the website, and on YouTube; ▪ Classroom presentation and workshop on stormwater pollution prevention aimed at school communities; ▪ Rain Barrel distribution event in one city aimed at residents of SMC; and 	<ul style="list-style-type: none"> ▪ 200+ social posts ▪ 10 newsletters ▪ 12 blog articles ▪ 2 live webinars ▪ 1 mail campaign ▪ 1 video ▪ 3 classroom presentations ▪ 2 school rain barrel installation ▪ 2 workshops ▪ 4 Rain barrel distribution events ▪ 1 website 	<ul style="list-style-type: none"> ▪ 200+ social posts ▪ 7 newsletters ▪ 3 blog articles ▪ 1 live webinar and workshop ▪ 1 video promoted ▪ 1 classroom presentation ▪ 1 school rain barrel installation ▪ 1 Rain barrel distribution event ▪ 1 website 			

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of Outreach Campaigns or Events Occurring during Each Permit Year, if Applicable				
		FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26	FY 2026/27
	<ul style="list-style-type: none"> The update and maintenance of the Flows to Bay website including information, education, guides, and best practices aimed at residents, businesses, and city departments. 					
C.7.d. Public Outreach and Citizen Involvement Events	<p>SMCWPPP conducted several resident-involved events including:</p> <ul style="list-style-type: none"> A Coastal Cleanup Day Volunteer event; Rain barrel distribution event held in one city aimed at residents; Rain Barrel workshop aimed at residents and school communities; On-site, hands-on rain barrel installation aimed at communities; On-site Integrated Pest Management tabling events aimed at pest control businesses, gardeners and shoppers; Virtual workshop and webinar aimed at residents. 	<p>17 events including:</p> <ul style="list-style-type: none"> 1 Volunteer event 4 Rain Barrel distributions 2 On-site installation workshops 5 tabling events 2 hardware store trainings 1 Round-Table discussion 3 webinars 	<p>8 events including:</p> <ul style="list-style-type: none"> 1 Volunteer event 1 Rain Barrel distribution 1 On-site installation workshop 4 tabling events 1 webinar and workshop aimed at residents 			
C.7.d. Watershed Stewardship Collaboration	<p>Together with the Bay Area Water Supply and Conservation Agency (BAWSCA), SMCWPPP supported and participated in:</p> <ul style="list-style-type: none"> A Rain Barrel Rebate program promoted to residents and conducted via newsletter, social media campaigns, and Google ads; 	<ul style="list-style-type: none"> 4 Rain Barrel Campaigns with Rebate promotion 2 Rain Garden Webinars with Rebate Promotion 	<ul style="list-style-type: none"> 1 Rain Barrel Campaign with Rebate promotion 1 Rain Garden Rebate program 			

Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of Outreach Campaigns or Events Occurring during Each Permit Year, if Applicable				
		FY 2022/23	FY 2023/24	FY 2024/25	FY 2025/26	FY 2026/27
	<ul style="list-style-type: none"> And a Lawn B Gone Rebate program aimed at residents and businesses and conducted by newsletter, blog and social media. <p>The rebate program encourages rebates for stormwater harvesting, water conservation, and lawn replacement by San Mateo County residents.</p>		(including one newsletter, blog, and several social media posts)			
C.7.e. School-Age Children Outreach	<p>SMCWPPP conducted stormwater prevention outreach to K-12 school children including:</p> <ul style="list-style-type: none"> Conducting 1 Classroom presentation aimed at Middle School students; Leading 1 Hands-On Rain Barrel Installation with a community workshop at 1 Middle School; Providing support for San Mateo’s COE’s Sustainable and Climate Ready Schools Initiative and the San Carlos Schoolyard Greening Project; And providing downloadable stormwater pollution educational materials, toolkits, and resources for each educational level from K-12 to teachers via the website. 	<ul style="list-style-type: none"> 2 High School presentations 1 Middle School presentation 2 Installations and Workshops K-12 Teaching Materials 	<ul style="list-style-type: none"> 1 Middle School presentation 1 Installation and Workshop 3 school-focused events attended K-12 Teaching Materials 			
C.7.f. Outreach to Municipal Officials	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A 				

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees comply with requirements in MRP Provision C.7 include the following:

- Grow the reach, engagement, and following of SMCWPPP's Facebook and Instagram accounts with posts and advertisements to continue expanding awareness of stormwater prevention and issues;
- Promote county outreach events and encourage volunteer efforts through the website and social media;
- Support individual jurisdiction's Pervious Pavement projects to highlight the benefits and support for Green Infrastructure;
- Conduct litter and illegal dumping outreach campaigns to bring awareness to the issue and encourage litter prevention and participation in litter cleanup behavior;
- Continue the bulk rain barrel program to distribute low-cost, high-quality rain barrels to residents while promoting the rain barrel rebate;
- Continue facilitating online and in-person outreach events that promote stormwater pollution prevention and best practices;
- Host and facilitate in-person tabling events at hardware stores across the county to educate employees, gardeners and gardening businesses and support IPM messages;
- Maintain and update SMCWPPP's www.flowstobay.org website as a reliable source of stormwater pollution content with the most updated initiatives, education and policies for residents, businesses and cities;
- Migrate the SMCWPPP's www.flowstobay.org website to a safer, more secure platform, with reliable functions and features;
- Continue outreach and promotion of stormwater messaging through the e-newsletter, one of the top performing platforms;
- Grow e-newsletter subscribership numbers through cross-promotion on the website, social media platforms, giveaways, contests, and paid advertising media;
- Support and promote the rain barrel rebate and rain garden rebate programs to rain barrel owners and enthusiasts in partnership with BAWSCA, and C/CAG providing ongoing funding;
- Create a comprehensive program that shares eco-friendly and stormwater pollution prevention practices, rebates, and educational workshops with residents, especially in disadvantaged communities (DAC);
- Support greening project planning and implementation at a priority school, in partnership with a rain harvest consultant and youth ambassadors to support GI efforts, school-age education, and outreach; and
- Provide ongoing online support of Resilient San Carlos Schoolyards project and in-person support of the County Office of Education's Sustainable and Climate Ready Schools Initiative and the Youth Climate Ambassador Program.

SECTION 8

C.8 WATER QUALITY MONITORING

On behalf of its member agencies, SMCWPPP performs water quality monitoring activities in compliance with MRP Provision C.8. Per Provision C.8, a complete documentation of all water quality monitoring data collected from October 1, 2023 through September 30, 2024 (i.e., Water Year 2024 or WY 2024) will be presented in SMCWPPP's Urban Creeks Monitoring Report, which will be submitted to the Regional Water Board by March 31, 2025.

SECTION 9

C.9 PESTICIDE TOXICITY CONTROLS

INTRODUCTION

The primary objective of MRP Provision C.9 Pesticides Toxicity Control is to prevent the impairment of urban streams by pesticide-related toxicity. Provision C.9 therefore helps implement the *TMDL for Diazinon and Pesticide-related Toxicity for Urban Creeks* in the San Francisco Bay region. Permittees are required to implement a pesticide toxicity control program that addresses their own use of pesticides and use by others within their jurisdictions. The focus is on pesticides that pose a threat to water quality, including applications with the potential to enter the municipal stormwater conveyance system.

Most MRP-required Provision C.9 tasks are implemented by each individual San Mateo County Permittee. SMCWPPP helps agency staff to understand MRP requirements and develops various tools that assist agency staff to effectively plan, implement, and report on compliance activities. SMCWPPP's assistance with Provision C.9 is coordinated through SMCWPPP's Parks Maintenance and Integrated Pest Management (IPM) Work Group, except that Provision C.9.h., the public outreach portion of Provision C.9, is implemented via SMCWPPP's Public Information and Participation (PIP) component.

IMPLEMENTATION OF MRP PROVISIONS

During FY 2023/24, SMCWPPP performed a number of tasks to assist member agencies with implementation of Provision C.9, with input and assistance provided by the Parks Maintenance and IPM Work Group. Accomplishments included the following:

- Held one meeting of the Parks Maintenance and IPM Work Group.
- Conducted SMCWPPP's Annual Landscape IPM Training Workshop in June 2024.
- Continued coordinating with San Mateo County Agriculture / Weights and Measures.
- Updated the pesticides tracking template with the current two years of pesticide product data from the Department of Pesticide Regulation (DPR) website.
- Participated in relevant BAMSC and CASQA activities.
- Continued to maintain retail partnerships with 12 top-tier stores that sell pesticides/fertilizers within San Mateo County, (e.g., The Home Depot and Hassett Ace Hardware). Tasks included ordering materials, organizing outreach collateral, checking in with store managers, and providing outreach to residents.
- Conducted one in-person workshop that was broadcast to a virtual audience via Zoom and in collaboration with the [San Mateo Arboretum Society](#) and led by an IPM Advocate in association with Our Water Our World to educate residents about less toxic alternatives to commercial pesticides and fertilizers. There were 100 registrants for Zoom, which resulted in 25 virtual and 10 in-person attendees. Everyone who registered and the in-person attendees were sent an email

with links to the recording, an online evaluation form, and the IPM Advocate's resources handout. There were 4 evaluations completed online and 3 in-person.

- The IPM Advocate conducted in-person outreach at popular hardware stores with two tabling events during the fiscal year.
- Sent a letter via mail to active-licensed pest control operators in San Mateo County in English and Spanish.

More information on each of these accomplishments is provided below.

Parks Maintenance and IPM Work Group

The Parks Maintenance and IPM Work Group provides the opportunity for sharing information about MRP Provision C.9 requirements and approaches for achieving compliance. Richard Holtz from the City of Burlingame chaired the work group. The Parks Maintenance and IPM Work Group met one time in FY 2023/24. The attendance list is included in Appendix 9.

Annual Landscape Integrated Pest Management Workshop

The annual SMCWPPP Landscape IPM Workshop was held online on June 5, 2024. The workshop was attended by 56 municipal staff and contractors and covered the following topics:

- Invasive Shot Hole Borer
- Regulatory Update – Pesticides Toxicity Control Requirements in the Municipal Stormwater Regional Permit
- Turfgrass Weed Control in Sports Fields and Parks
- Organic and Conventional Pesticides
- Regulatory Update and Common Violations

The presenters were from SMCWPPP, UC Cooperative Extension, PC Turf Pro, and San Mateo County Agriculture/Weights and Measures. Evaluation forms completed by the workshop's attendees indicated that overall, the workshop was beneficial and met their expectations. Appendix 9 includes the workshop agenda, attendance list, and a summary of the evaluations. Other workshop materials are available on the SMCWPPP website (flowstobay.org).

Coordination with San Mateo County Department of Agriculture

As in past years, San Mateo County Agriculture / Weights and Measures staff attended the FY 2023/24 meeting of the Parks Maintenance and IPM Work Group and received information on water quality issues and the MRP. In addition, SMCWPPP worked closely with San Mateo County Agriculture / Weights and Measures staff to provide DPR Continuing Education Hours for participants in the Landscape IPM Workshop.

Pesticide Tracking Template

In FY 2016/17, SMCWPPP developed a template in Excel to assist with pesticide tracking and reporting requirements in MRP Provision C.9.a. The pesticides tracking template utilizes a lookup list of pesticides and active ingredients compiled from data tables available on the Department of Pesticide Regulation

(DPR) website. The template was updated during FY 2023/24 with the current two years of pesticide product data from the DPR website.

Participation in CASQA

MRP Provision C.9.f. requires Permittees to track and participate in regulatory processes relevant to pesticide toxicity control. During FY 2023/24, SMCWPPP accomplished this task by working with CASQA. For additional information, see the *CASQA 2024 Pesticide Annual Report and Effectiveness Assessment* included in Appendix 22. In addition, SMCWPPP staff stayed current with pesticide controls and regulatory efforts by participating in selected CASQA meetings.

SMCWPPP also provided funds toward implementing the Regional OWOW Program, which is now being managed by CASQA. SMCWPPP staff participated in the CASQA OWOW Committee and provided input, as needed. Additional details are included in the *CASQA 2024 OWOW Annual Report* included in Appendix 22.

Point of Purchase Outreach

SMCWPPP conducted point-of-purchase outreach to home improvement store consumers at frequently visited stores (e.g., The Home Depot and Hassett Ace Hardware), providing tips to residents about the proper use and disposal of pesticides and other lawn and garden chemicals. Through a partnership with a sub-consultant, Charlotte Canner (an IPM Advocate in association with [Our Water Our World](#)), SMCWPPP was also able to provide the public with a credible and reliable source of information at tabling events. Charlotte educated consumers and store employees about proper pesticide use, less toxic pesticide options, and effective alternatives to pesticides. Tabling events were held at larger store locations to maximize the outreach effort; photos are included in Appendix 9. Tabling events were promoted via Facebook, Instagram, the SMCWPPP event calendar, and by PIP Subcommittee members.

SMCWPPP’s in-store tabling events consisted of educating consumers about (1) stormwater runoff, (2) the role residents play in reducing pesticide use, (3) the less-toxic pesticides sold in the store, and (4) proper usage of pesticides and current pest problems/less-toxic solutions to these problems. At these events, consumers were directly engaged with and informed about solutions for every issue – from sooty mold to gophers. Swag items were also given away. Table 9-1 below summarizes the two tabling events held during FY 2023/24, which included engagement with 72 store associates and customers. Appendix 9 shows examples of graphics designed to promote the events.

Table 9-1. FY 2023/24 San Mateo County IPM In-store Tabling Events

Store	Date of Tabling Event	Number of People Engaged With	Number of Surveys Taken
Outdoor Supply Hardware, Millbrae	5/11/24	26 customers, 2 associates	2
The Home Depot, San Mateo	6/8/24	40 customers, 4 associates	5

Program materials were provided directly to the public via point-of-purchase displays during tabling events at a time when residents are most receptive to hearing our message. Additionally, shelf talkers were placed next to products that are Our Water Our World (OWOW) certified as less toxic, and topic-specific factsheets from OWOW were re-stocked quarterly throughout the fiscal year during store visits. All of these efforts helped to promote the regional OWOW program. Table 9-2 lists the 12 stores that currently participate in the OWOW point-of-purchase program. Appendix 9 shows photographs from store visits.

Table 9-2. FY 2023/24 San Mateo County Participating OWOW Hardware Stores

Store Name	Address	City
Brisbane Hardware	1 Visitacion Ave.	Brisbane
Hassett Ace Hardware	1029 Alameda de las Pulgas	Belmont
Hassett Ace Hardware	111 Main St.	Half Moon Bay
Hassett Ace Hardware	282 Woodside Plaza	Redwood City
Hassett Ace Hardware	545 1 st Ave.	San Mateo
Lyngso Garden Materials, Inc	345 Shoreway Rd.	San Carlos
Outdoor Supply Hardware	900 El Camino Real	Millbrae
Outdoor Supply Hardware	2110 Middlefield Rd	Redwood City
The Home Depot	2 Colma Blvd.	Colma
The Home Depot	303 Lake Merced Blvd.	Daly City
The Home Depot	1781 E Bayshore Rd.	East Palo Alto
The Home Depot	2001 Chess Dr.	San Mateo

ECO-Friendly Weed Management Workshop

Charlotte, the point-of-purchase sub-consultant, was also the expert instructor for the IPM-focused workshop/webinar. The educational event educated residents about proper pesticide use, less toxic pesticide options, effective alternatives to pesticides, preventative pest management tips, and suggested actions for the garden and yard. The event was hosted by the [San Mateo Arboretum Society](#) both in-person at their location and on their Zoom account.

The title and date of the workshop/webinar during FY 2023/24 was:

- September 10, 2023—*Eco-Friendly Weed Management*

The in-person/online event was promoted via Facebook, Instagram, the SMCWPPP event calendar, Meta (Facebook and Instagram) ads, the SMCWPPP mailing list, and through the PIP Subcommittee members and local partners. Table 9-3 provides data from the IPM-focused workshop/webinar. Appendix 9 shows graphics designed to promote the event and the e-newsletter and screenshots captured during the workshop.

For this workshop/webinar, SMCWPPP:

- Created Facebook and Instagram posts on our feed and Story, created and paid for boosting a Facebook event, and sent an e-newsletter to our mailing list. We also conducted outreach to the PIP members and local organizations to help spread awareness about the event, and included a communication toolkit to easily promote it. Our e-newsletter continues to be the highest-performing source for webinar registrants.
- Conducted polls and fielded questions during the workshop/webinar (the majority of which were answered live by the expert instructor).
- The [San Mateo Arboretum Society](#) approached us during FY 2022/23 to conduct a presentation in September 2023 (FY 2023/24) with content from the Eco-Friendly Weed Management webinar in March 2022 (FY 2021/22). The event was conducted at the [San Mateo Arboretum Society's](#) headquarters in San Mateo, broadcast online through their Zoom account, which follows their usual programming method. They distributed their feedback survey in-person and digitally. Resources shared during the workshop/webinar were also shared in the post-webinar email, as well as a link to the recording of the full webinar (published on [their YouTube account](#)).
- Recordings from webinars SMCWPPP has hosted in previous fiscal years and shorter tip-focused clips are on the SMCWPPP [YouTube page](#) and [embedded on the website's "Pest Management"](#).

The following are the Promotional Campaign Results from the September 2024 Workshop/Webinar with the San Mateo Arboretum Society:

- 612 total Facebook reach on posts advertising the webinar.
- 464 total Instagram reach on posts advertising the webinar
- 4 total page views on event within SMCWPPP's website Events Calendar
- 3010 total reach for Facebook event
- 29 total event responses for Facebook events about the webinar
- 1,701 total opens for e-Newsletter about the webinar
- 112 total clicks to Zoom registration page for the webinar on the relevant e-Newsletter

Table 9-3. FY 2023/24 IPM-Focused Workshop/Webinar Data

Dates	Webinar Name	Number of Attendees	Number of Registrants	Attendee Rate	Number of Surveys Taken
9/10/24	Eco-Friendly Weed Management	25 virtual 10 in-person	100	35%	7 (4 online; 3 in person)

Pest Control Contracting Outreach

In FY 2023/24, SMCWPPP continued outreach that directly targets residents and pest control contractors, to (1) encourage San Mateo County communities to reduce their reliance on toxic pesticides that threaten water quality, (2) encourage public and private landscape irrigation practices that minimize pesticide runoff, (3) promote appropriate disposal of unused pesticides, and (4) encourage residents to hire pest control professionals that use IPM practices.

SMCWPPP conducted this outreach via Facebook and Instagram. Examples of Facebook posts are shown in Figure 9-1 and Instagram posts in Figure 9-2. Table 9-4 has a breakdown of posts related to pest control promoted during FY2023/24.

Table 9-4. FY 2023/24 Pest Control Related Posts

	Posts	Engagements (likes, comments, shares, and link clicks)	Reach
Facebook	20	44	4,935
Instagram	18	70	1,953

In addition to social media posts, SMCWPPP stocked OWOW fact sheets detailing IPM approaches to various pest-related problems, as well as resources for hiring pest control companies (Figure 9-3) and disposing of pesticides responsibly, in literature racks at the 12 program hardware stores listed in Table 9-2. Our sub-consultant, Charlotte Canner (an IPM Advocate in association with [Our Water Our World](#)), also discussed this topic and fact sheets during quarterly store visits and two tabling events with customers and store associates. Relatedly, posts were published on SMCWPPP’s Instagram and Facebook to promote this message.

To help fulfill the MRP Provision C.9.e.ii. (3) requirement for outreach to pest control operators, the SMCWPPP incorporated direct outreach to pest control operators. The aim of this outreach was to inform pest control operators of the hazards of pesticides and to encourage the reduction of their usage. The letter was prepared in both English and Spanish, which can be viewed in Appendix 9. Prior to outreach, the SMCWPPP team reviewed the Department of Consumer Affairs (DCA) License Database and updated our contacts of San Mateo County pest control operators from the Department of Pesticide Regulation and the Structural Pest Control Board accordingly. A page is dedicated to pest control professionals on the SMCWPPP website. The page can be viewed in Figure 9-4 or by visiting: flowstobay.org/pestpro.

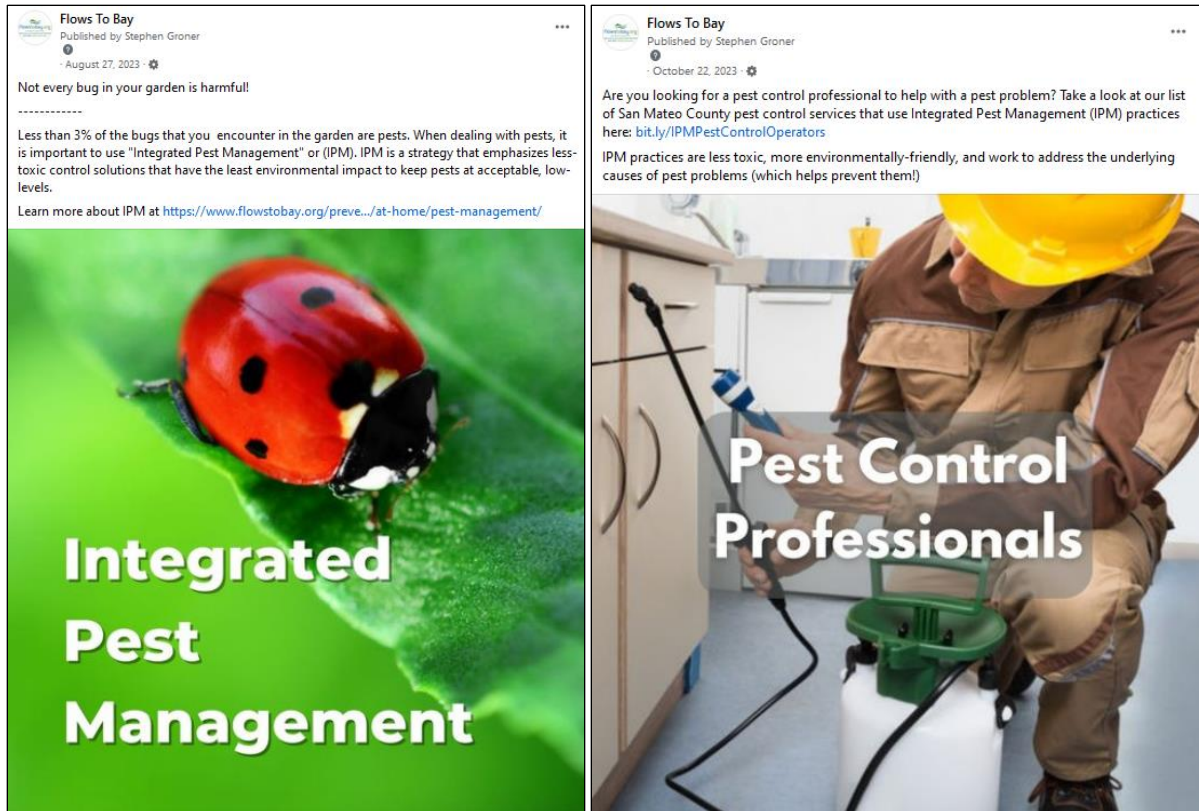


Figure 9-1. Examples of Facebook posts promoting pesticide pollution prevention

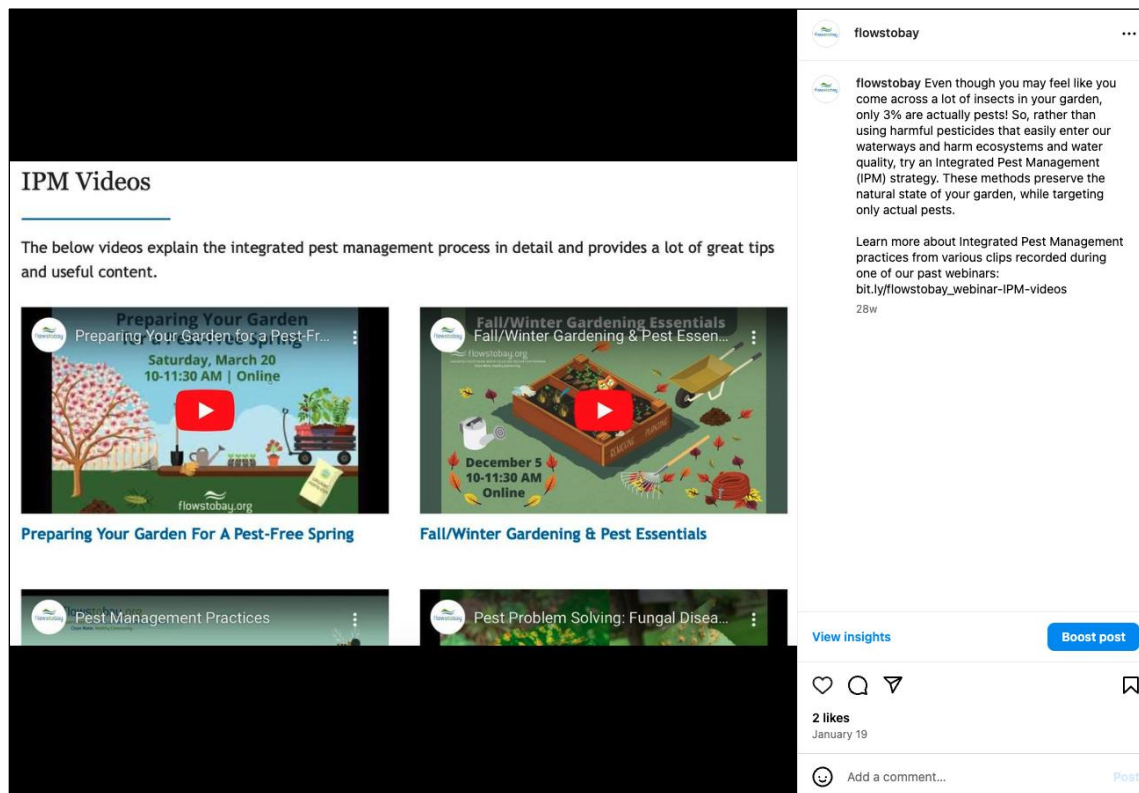


Figure 9-2. Examples of Instagram posts promoting pesticide pollution prevention.

EFFECTIVE ECO-FRIENDLY PEST CONTROL • LESS-TOXIC PRODUCTS



HIRING A PEST CONTROL COMPANY

ASK FOR IPM SERVICES!

Sometimes a pest problem is so bad that you don't want to tackle it yourself. Or sometimes, as with bed bugs or a yellowjacket nest, it's more efficient to get professional help.

Just as **Our Water Our World** promotes products that are eco-friendly and effective, we also believe that the best pest control services use **integrated pest management practices (IPM)**.

FINDING A PEST CONTROL COMPANY THAT USES IPM

Most pest control companies recognize that IPM solves pest problems more permanently than repeated spraying, because IPM emphasizes keeping pests out of buildings and working with residents on prevention. It's still very important, though, to ask specifically for IPM services when you interview or hire a pest management company, or discuss services with your regular provider. In California, three programs certify and list pest control companies that provide IPM services.

- EcoWise Certified** (www.ecowisecertified.org), based in California, administers a rigorous test to make sure licensed pest management professionals understand and can provide prevention-based pest control practices. They certify both companies and individuals.
- GreenPro** (www.whatisgreenpro.org), a program of the National Pest Management Association, certifies companies and IPM services that are "reduced risk, comprehensive, and effective."

WHAT IS IPM?

Integrated Pest Management (IPM) relies on (1) locating and identifying pests, (2) getting rid of pests using traps, vacuuming, or other physical or mechanical means, (3) keeping pests out by blocking entry points such as cracks and holes, and (4) when necessary, using eco-friendly pesticides such as cockroach gel baits.

- Green Shield Certified (www.greenshieldcertified.org), operated by the nonprofit IPM Institute of North America, certifies companies and services.

Even when you call a certified business, insist on IPM! Many certified companies offer both conventional spray programs and IPM services. Many companies that aren't certified have their own green service options.

QUESTIONS TO ASK A PEST CONTROL COMPANY

- Is your company certified by EcoWise, Green Pro, or Green Shield?
- Can I count on you to deliver IPM services?
- Will you send a person who specializes in IPM?
- Do you try other steps before using a pesticide?
- Will the services you provide keep pests from coming back?

WHAT'S WRONG WITH ROUTINE SPRAYING?

Conventional pest control often relies on routine spraying of pesticides inside and around buildings, and along walkways. This may give temporary relief from visible pests, but pests that are hiding behind appliances or in wall spaces will survive and keep breeding. Pests can also become resistant to the pesticides. This means the non-IPM service provider will have to come back and spray again—treating the symptoms of a pest infestation, but not curing the problem. You may be both paying for services that are less effective than IPM, and living with pests.



Choose eco-friendly products for your home and garden. Look for this symbol before you buy.

- Can I see a typical service ticket? Make sure the ticket shows specific kinds of pests and where they were found on your property; structural conditions that should be corrected to keep pests away; and the recommended length of time before the next visit.

WHAT TO EXPECT FROM IPM SERVICES

The first visit will usually include inspection of your home or building, inside and out, to find out what kinds of pests are there; where they find food, water, and shelter; and how they get inside. The service person may leave sticky traps behind to confirm you have pests and learn where they're hiding.

The technician should give you a list of structural issues with the building that may provide places for pests to live and breed. IPM companies will often make simple structural repairs ("pest exclusion repairs") as a service. You and the service provider should make an agreement about who is going to fix what, and when.

The service person may suggest that you clear up clutter so that pests have fewer hiding places and are easy to spot. Don't take it personally! IPM is a team effort.

With clutter reduced and pest exclusion repairs complete, future IPM services are likely to be brief and limited to monitoring for pests (checking sticky traps). But if you see pests, **be sure to call the IPM service company!**



DOES IPM COST MORE?

IPM may cost more than conventional spray treatments at first, because of the time it takes to make a thorough inspection and the cost of repairs to keep pests out. Over time, IPM services should happen less often, take less time, and cost less. Studies show that IPM saves money in the long run.

WHAT ABOUT BED BUGS?



Bed bugs are tiny brown or red crawling insects. They can be hard to see unless you're looking for them. The first sign of bed bugs may be people getting bitten at night. Bites can cause an itchy red rash... or not show up at all. Bed bugs or the brown or reddish stains they leave behind are usually found in mattress seams, furniture, upholstery, or cracks around baseboards close to where people sleep.

IPM providers may use heat treatment to end an infestation. This requires moving items that may be damaged by heat out of the living space, doing a lot of laundry, and staying away for several hours while heaters are brought in to raise the temperature up to 150° F. Bed bugs in clothes are generally killed after 20 minutes in a hot clothes dryer.

California state law requires that landlords must treat units infested with bed bugs. The landlord has to pay for pest control services and cannot raise the rent or cause problems for a tenant who complains. The tenant has to follow the pest control professional's instructions on how to get ready for treatment. Nearby units may also be inspected, and treated if bed bugs are found.

WWW.OURWATEROURWORLD.ORG

Common home and garden pesticides are found in stormwater runoff, treated wastewater, and in local waterways, sometimes at levels that can harm sensitive aquatic life. **Our Water Our World** is a joint effort by water pollution prevention agencies, participating retail stores, and pesticide distributors and manufacturers—working together to reduce the risks associated with pesticide use.

Our Water Our World fact sheets and store displays educate residents about less-toxic pest management. For the rest of the series of fact sheets, visit www.OurWaterOurWorld.org. Look for the **Eco-friendly** tag next to less-toxic products in participating stores and nurseries. See the Pesticides and Water Quality fact sheet for information on active ingredients in common pesticides that may cause water quality problems.

For more information, contact:
 Bio-Integral Resource Center (BIRC), 510.524.2567, www.birc.org
 University of California Cooperative Extension Master Gardeners in your area
 University of California IPM website, www.ipm.ucdavis.edu

February 2020

Figure 9-3. Our Water Our World factsheet, “[Hiring a Pest Control Company](#)”, was restocked at the 12 program stores throughout San Mateo County.

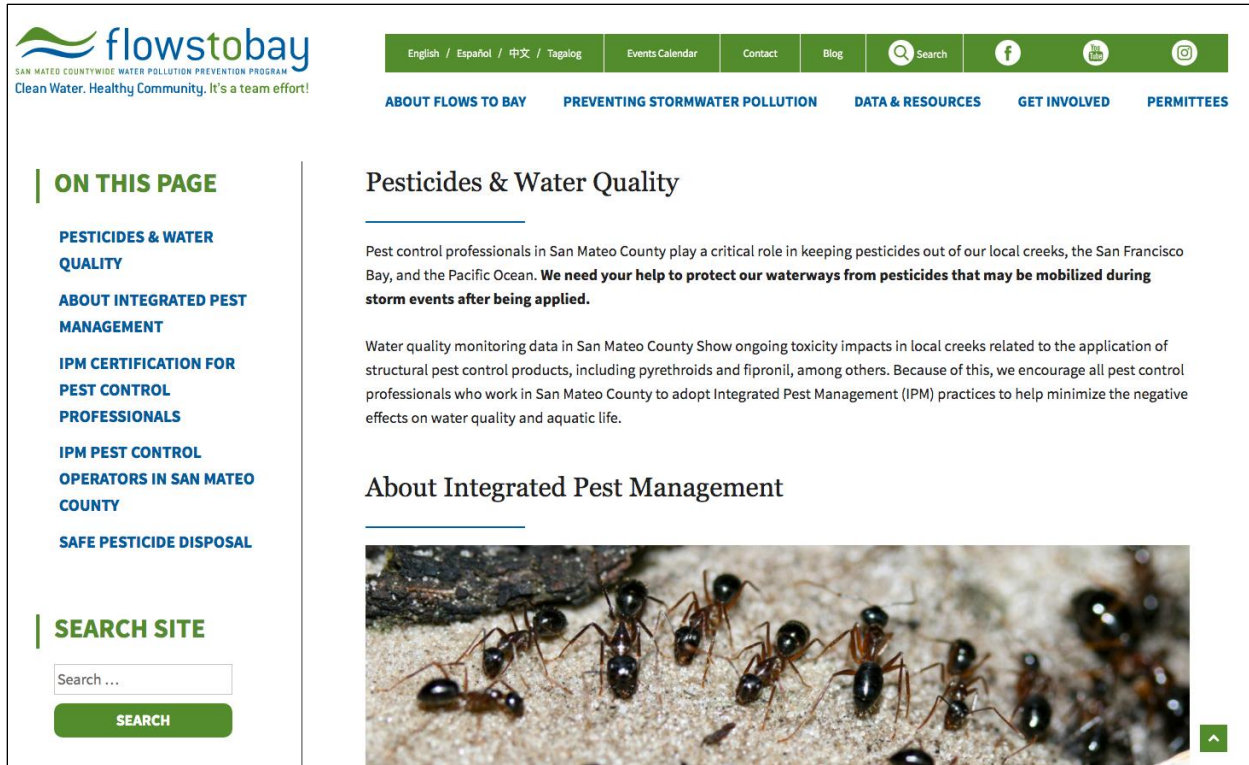
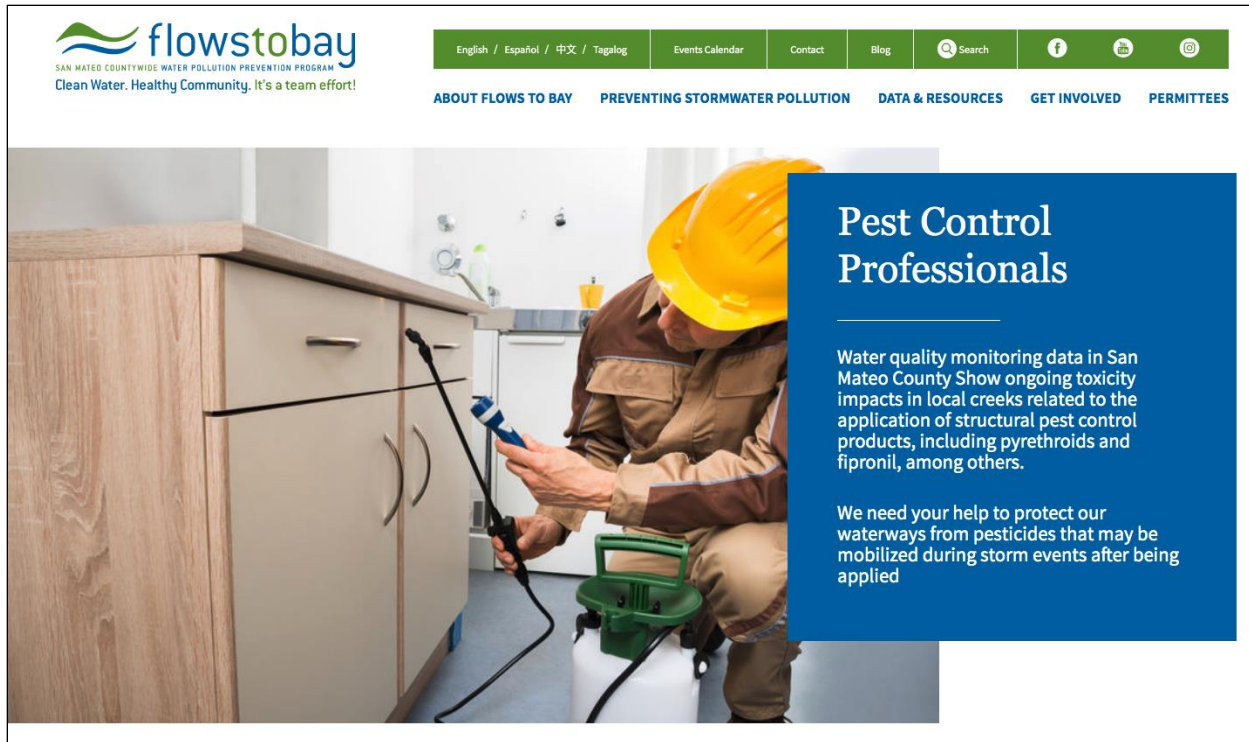


Figure 9-4. Screenshots of “Pest Control Professionals” web page on the SMCWPPP website

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees understand and comply with requirements in MRP Provision C.9 include the following:

- Continue to assist member agencies implement their IPM programs and policies, with input and assistance provided by the Parks Maintenance and IPM Work Group;
- Continue holding Parks Maintenance and IPM Work Group meetings once per year;
- Conduct annual landscape and/or structural IPM training workshop (if selected as priority topic among potential trainings using limited FY 2023/24 budget);
- Continue to coordinate with County Agriculture / Weights & Measures;
- Coordinate and execute online events related to water pollution prevention;
- Launch promotional campaigns to promote online events;
- Continue using signage and materials developed by OWOW for the point-of-purchase program;
- Perform outreach messaging to residents on best practices for hiring pest control contractors certified in IPM via fact sheets, SMCWPPP's website (flowstobay.org), social media posts, and the SMCWPPP e-newsletter; and
- Send direct mailers and email communications to pest control professionals that encourage IPM certification and education.

SECTION 10

C.10 TRASH LOAD REDUCTION

INTRODUCTION

MRP Provision C.10 Trash Load Reduction tasks are implemented by each San Mateo County Permittee. SMCWPPP, the Countywide Program, helps agency staff to understand trash load reduction requirements and develops various tools needed to effectively plan, implement, and report on compliance with the requirements included in Provision C.10, which requires Permittees (as applicable) to:

- Reduce trash discharges from 2009 levels by 90% by June 30, 2023, and 100% by June 30, 2025.
- Implement trash prevention and control actions, including full trash capture systems or other trash management actions, or combinations of actions, with trash discharge control equivalent to or better than full trash capture systems, to reduce trash generation to a low trash generation rate or better;
- Ensure that private lands that are moderate, high, or very high trash generating, and that drain to storm drain inlets that Permittees do not own or operate (private), but that are plumbed to Permittees' storm drain systems are equipped with full trash capture systems or are managed with trash discharge control actions equivalent to or better than full trash capture systems;
- Maintain and provide documentation of the design, operation, and maintenance of full trash capture systems, including the mapped location and drainage area served;
- Assess trash reductions associated with control measures other than full capture systems using a visual assessment protocol; and
- Maintain a Long-Term Trash Load Reduction Plan designed to achieve 100% trash reduction.

During FY 2023/24, SMCWPPP completed the tasks described below in support of member agency trash management activities conducted in compliance with the above requirements.

IMPLEMENTATION OF MRP PROVISIONS

SMCWPPP performs a variety of tasks to assist San Mateo County Permittees with implementation of MRP Provision C.10 requirements listed above, with input and assistance provided by the SMCWPPP Trash Subcommittee. FY 2023/24 accomplishments included the following:

- Coordinated and facilitated four meetings of SMCWPPP's Trash Subcommittee;
- Assisted San Mateo County Permittees in delineating trash full capture treatment areas and managing trash full capture information in GIS (currently > 11,340 acres are treated by full capture systems in San Mateo County);
- Continued to implement SMCWPPP's Trash Assessment Strategy, including conducting 653 On-land Visual Trash Assessments (OVTAs) at 239 sites in FY 2023/24 and maintained the Countywide

Program's Trash Load Reduction dashboard to allow San Mateo County Permittees to assessment results and have access to load reduction estimates;

- Continued to provide guidance to San Mateo County Permittees on complying with MRP operation and maintenance requirements and implementing standard operating procedures for maintaining trash full capture systems;
- Assisted with developing San Mateo County Permittee Revised Trash Generation Maps using ArcGIS On-line (AGOL);
- Held a Private Land Drainage Area (PLDA) Inspection Field Training for Permittees on January 30, 2024, where procedures for conducting PLDA trash inspections, including how to use the SMCWPPP standardized PLDA inspection data collection form, were demonstrated.
- Identified remaining PLDAs that are less than 10,000 ft² for each Permittee;
- Developed additional tools for tracking, managing, and reporting PLDA inspection results;
- Assisted with developing suggested responses to Water Board staff comments and next steps to the BAMSC Trash Subcommittee regarding the use of bioretention facilities as trash full capture;
- Shared information on regional, state, and federal litter-related topics including foodware reuse and reduction programs, legislation, illegal dumping, and guidance documents;
- Coordinated with the SMCWPPP Public Information and Participation (PIP) Subcommittee on public outreach efforts targeting litter reduction;
- Coordinated with San Mateo County Permittee, Caltrans, and the Regional Water Board staff on the potential installation of large trash full-capture systems through cooperative implementation agreements;
- Assisted San Mateo County Permittees that did not achieve the 90% trash load reduction benchmark by June 30, 2023 address Water Board staff comments received on their Updated Long-term Trash Load Reduction Plans; and
- Assisted San Mateo County Permittees in developing information necessary for reporting trash load reductions with their FY 2023/24 Annual Reports.

More information on each of these accomplishments is provided below.

Trash Subcommittee

SMCWPPP's Trash Subcommittee assists San Mateo County Permittees with the implementation of new or enhanced trash control measures and actions required by the MRP. The Trash Subcommittee generally meets quarterly. Additional meetings are scheduled as necessary to address high priority issues.

During FY 2023/24, Countywide Program staff facilitated four Trash Subcommittee meetings, which were chaired by Chris Sommers (EOA, Inc.). The Trash Subcommittee continued to have excellent participation by municipal staff and other stakeholders, as shown in the FY 2023/24 attendance list (Appendix 10).

During the Trash Subcommittee meetings in FY 2023/24, Subcommittee members discussed and provided input on the following topics/projects:

- C.10 requirements in the MRP;

- SMCWPPP Long-Term Trash Reduction Guidance Work Plan tasks;
- The development of a grant application through C/CAG for funding from the USEPA San Francisco Bay Water Quality Improvement Fund;
- New or planned installations of trash full capture systems in San Mateo County Permittee jurisdictions;
- The FY 2023/24 Annual Report format for Provision C.10;
- Draft Trash Impracticability Report;
- Discharges associated with unsheltered homeless populations;
- Receiving water trash monitoring;
- Multi-benefit full trash capture system;
- Other opportunities for collaboration with Caltrans; and
- SMCWPPP Trash Assessment Strategy, including OVTAs conducted in Trash Management Areas (TMAs).

Demonstration of Trash Load Reductions (C.10.a.ii)

SMCWPPP developed an initial *Trash Assessment Strategy* (Assessment Strategy) in FY 2013/14 on behalf of San Mateo County Permittees. The Strategy was submitted to the Regional Water Board on February 3, 2014, as part of San Mateo County Permittee Long-Term Trash Load Reduction Plans and was intended to serve as the trash tracking method required by the Permit. SMCWPPP began to implement the Strategy in FY 2013/14 and continued to implement it at a full-scale in FY 2023/24 on behalf of (and in collaboration with) all San Mateo County Permittees.

The Assessment Strategy is intended to provide information on the magnitude and extent of trash reductions associated with stormwater discharges in the San Mateo County. The Strategy is consistent with C.10 assessment and reporting requirements in the MRP and is primarily designed to answer the following core management question:

Have MS4 trash load reduction targets (i.e., 40%, 70%, 80%, 90% and 100%) been achieved by San Mateo County Permittees?

The primary environmental and programmatic indicators that SMCWPPP and San Mateo County Permittees currently track to answer this core management question are:

1. **Full Capture Systems** – The extent of areas effectively treated by trash full capture devices and the operation and maintenance of these devices;
2. **Other Trash Controls** – Reductions in the levels of trash observed on-land and available to enter MS4s;
3. **Additional Creek and Shoreline Cleanups (Offset)** – The volumes of trash removed via creek and shoreline cleanup events; and
4. **Source Controls (Credits)** – Reductions in the levels of litter prone items observed in the environment that are subject to source controls, such as ordinances that limit or prohibit the distribution of specific types of items;

- 5. Direct Discharge Programs (Offset)** – The extent and magnitude of trash removed or prevented from entering a receiving water body from pathways other than stormwater that are directly impacting those water bodies (e.g., illegal dumping or illegal encampments).

In selecting the indicators above, San Mateo County Permittees recognized that multiple indicators can provide the information necessary to definitively determine that progress has been made to reduce trash discharged from MS4s. SMCWPPP's methods used to collect or track information on the primary indicators 1, 2 and 3 listed above are briefly described below, along with summaries of associated activities conducted by SMCWPPP in FY 2023/24. Because trash load reduction credits for existing source controls are no longer allowable under the MRP, indicator 4 is not used by San Mateo County Permittees when demonstrating trash load reductions. Additionally, methods used to assess indicator 5 have not been implemented to-date because none of the San Mateo County Permittees has submitted or implemented an optional direct discharge plan as outlined in the MRP. Additional information and the results of data collected to support indicators 1, 2 and 3 are found in Section 10, Provision C.10.b.iii(a) and (b), of individual San Mateo County Permittee FY 2023/24 Annual Reports.

1. Full Capture Systems (Including Operation and Maintenance)

Devices and facilities meeting the trash full capture design criteria described in the MRP and certified by the State Water Resources Control Board (State Water Board) are effective trash controls if adequately maintained to ensure their capture efficiency. Consistent with the Long-Term Plan Framework and the State Water Board's Trash Amendments, if a full capture device is maintained effectively then trash from the area draining to the device is effectively reduced to a level of "no adverse impacts" and has achieved the ultimate trash reduction benchmark outlined in the MRP (i.e., 100% reduction). Additional trash reductions, therefore, are not needed in areas draining to (and treated by) full capture systems to demonstrate compliance with the MRP benchmarks.

From FY 2013/14 through FY 2023/24, SMCWPPP and San Mateo County Permittees have expended considerable time and resources identifying and mapping areas draining to full capture devices, using a combination of fieldwork and desktop Geographical Information System (GIS) analysis. Drainage areas for newly installed full capture devices are delineated and mapped as part of an annual update of individual San Mateo County Permittee full-capture device GIS data layers. As a result, all drainage areas have been delineated for all devices installed to-date in San Mateo County. More than 11,340 acres of land area is currently treated by full capture systems in San Mateo County. Trash reductions associated with these areas are calculated based on the baseline trash generation levels established on San Mateo County Permittee baseline trash generation maps and are reported in individual Permittee Annual Reports (see Section C.10).

In accordance with MRP Provision C.10.a.ii.(a) and the State Water Board's Trash Full Capture Certification process, stormwater treatment facilities (e.g., bioretention systems) implemented in accordance with MRP Provision C.3 are deemed a full capture system if the facility, including its maintenance, prevents the discharge of trash to the downstream MS4 and receiving waters and discharge points from the facility, including overflows, are appropriately screened or otherwise configured to meet the full trash capture screening specification for storm flows up to the full trash capture one year, one hour storm hydraulic specification. Based on this definition, San Mateo County Permittees have applied a very conservative assumption to determine which bioretention facilities constructed in Santa Clara County are meeting the criteria included in the MRP and the State Water Board Certification Factsheets for "multi-benefit" stormwater treatment systems should be

considered trash full capture systems. Currently, only bioretention facilities constructed after July 1, 2010, designed to treat at least 3% of the drainage management area (DMA), and have at least a 6-inch ponding depth have been identified by San Mateo County Permittees as meeting the definition of a trash full capture system. A technical memorandum describing the analysis conducted by the Santa Clara Valley Urban Pollution Prevention Program (SCVURPPP) that supports the application of these criteria and considering these multi-benefit systems as trash full capture systems was provided in Appendix 10-1 of SCVURPPP's FY 2021/22 Annual Report. In FY 2023/24, Water Board staff provided comments on the technical memorandum developed by SCVURPPP. Countywide Program staff assisted with developing suggested responses to Water Board staff comments and next steps to the BAMSC Trash Subcommittee regarding the use of bioretention facilities as trash full capture. A meeting with Water Board staff to discuss next steps was held on May 30, 2024. Countywide Program staff will continue to participate in discussions regarding the use of bioretention facilities as trash full capture.

Additionally, SMCWPPP completed the development of a Model Trash Full Capture Device O&M Verification Program in FY 2015/16. The O&M Verification Program is intended to ensure that devices are operated at a level necessary to maintain their full capture designation. In FY 2023/24, SMCWPPP continued to provide guidance to San Mateo County Permittees on O&M requirements and standard operating procedures developed for San Mateo County Permittees as part of the Model Verification Program. San Mateo County Permittees with full capture devices have an O&M verification program tailored to fit the types of devices in their stormwater conveyance system and the associated maintenance procedures needed to adequately maintain these devices. Individual San Mateo County Permittee Annual Reports provide information regarding O&M of full capture devices and any associated issues with the devices (see Section 10, Provision C.10.b.i and ii).

2. Other Trash Control Measures (via On-land Trash Visual Assessments)

In FY 2013/14, SMCWPPP developed a pilot approach to assess trash reductions on land areas that generate substantial levels of trash (i.e., very high, high, or moderate trash generation) and are not treated by full capture devices. The approach uses on-land visual trash assessment (OVTA) protocols to record changes in the levels of trash on streets, sidewalks, and properties over time. The assessment protocols score sites/areas using a 4-tier system (A - D, A being the least amount of trash). The four OVTA scoring categories correspond with the four trash generation rate categories (i.e., low-A; moderate-B; high-C; and very high - D) and the associated weighting factors (i.e., 0, 1, 4, 12) included in the MRP.

Consistent with the MRP, OVTAs are conducted at randomly selected street/sidewalk sites representing at least 10% of the applicable street miles in each trash management area (TMA) where trash reductions are being reported by San Mateo County Permittees. OVTAs are conducted at a frequency necessary to confidently detect reductions in trash levels at these sites. Based on the findings of the *Tracking California's Trash* State Water Resources Control Board funded project, conducting between 4 and 6 assessments on average at a site will allow improvements in trash levels to be detected with an acceptable level of confidence. Currently, SMCWPPP annually conducts roughly three assessments at each site each FY and then averages two FYs of data to calculate trash load reductions in a given FY. For example, in reporting reductions for FY 2023/24, results from assessments conducted in both FY 2022/23 and FY 2023/24 were averaged and used to represent the "current" levels of trash within the applicable land areas.

During FY 2023/24, Countywide Program staff conducted 653 OVTAs at 239 assessment sites (averaging 1,000 feet in length). All OVTA sites were assessed at least two times during FY 2023/24, and most were assessed three times. During a typical year, all sites are assessed three times. Table 10-1 summarizes the number of OVTAs conducted each fiscal year from FY 2016/17 through FY 2023/24. OVTA data are stored in the SMCWPPP Trash Load Reduction Dashboard, which is available to San Mateo County Permittees.

Table 10-1. Number of OVTAs completed in San Mateo County by fiscal year.

FY 16/17	FY 17/18	FY 18/19	FY 19/20	FY 20/21	FY 21/22	FY 22/23	FY 23/24
499	827	704	562	788	677	601	653

3. Additional Creek and Shoreline Cleanups (via volumes of trash removed from waterways)

San Mateo County Permittees are also allowed to claim up to a 10% trash load reduction for conducting trash cleanups of creek and shoreline areas. SMCWPPP assists San Mateo County Permittees by calculating load reductions associated with these efforts based on the volumes of trash reported. Load reductions associated with these efforts are calculated based on methods described in the MRP and are reported in Section C.10.f.i of individual San Mateo County Permittee Annual Reports.

4. Direct Discharge Programs

To-date, San Mateo County Permittees have not submitted or implemented an optional direct discharge plan as outlined in the MRP.

Model Private Land Drainage Area Trash Control Program

As described in MRP 3.0 Provision C.10.a.ii.(b), private properties that 1) generate moderate, high, or very high level of trash, 2) are plumbed to the San Mateo County Permittee’s MS4, and 3) are not already addressed by a full capture device are required to be equipped with a full capture device or be managed by trash control measures equivalent to or better than a full capture device by July 1, 2025.

To address trash contributions from these properties, which are referred to as Private Land Drainage Areas (PLDAs), SMCWPPP finalized a memorandum in FY 2022/23 describing the recommended approach for implementing a Trash Inspection Program (TIP) for PLDAs. Guidance on developing a San Mateo County Permittee TIP Plan and inventory of PLDAs greater than 10,000 ft² were included as attachments to the memorandum. Through the TIP, inspections are performed on PLDAs and if the level of trash observed on the property via OVTAs is greater than low trash generation, property owners and/or managers are required to implement additional trash control measures and achieve low trash generation. Trash control measures may include FTC systems or other types of trash control actions. The goal of the TIP is to address trash from all PLDAs in the City by July 1, 2025.

During FY 2023/24, SMCWPPP identified remaining PLDAs that are less than 10,000 ft² for inclusion in the TIPs, developed additional tools for tracking, managing, and reporting PLDA inspection results, and created a fact sheet and inspection letter for San Mateo County Permittees to use in educating property owners and managers about trash reduction requirements. Some San Mateo County Permittees began implementing a TIP on PLDAs during FY 2023/24. As described in Permittee FY 2023/24 Annual Reports,

Permittees inspected and documented low trash generation levels and appropriate trash control measure implementation or will begin implementing the TIP at PLDAs in FY 24-25 that are believed to generate significant levels of trash.

As part of launching San Mateo County Permittee PLDA TIPs, SMCWPPP provided field training on how to perform PLDA trash inspections on January 30, 2024. A total of 41 municipal staff and consultants attended the field training. The use of a standardized PLDA inspection data collection form was presented at the training. The agenda, attendance record, and evaluation summary are included in Appendix 10. The presentation is posted on the SMCWPPP [website](#).

Revised Trash Generation Maps

MRP 3.0 Provisions C.10.a.ii and g.ii require MRP Permittees to submit a revised trash generation map(s) with their FY 2023/24 Annual Reports. A meeting with Water Board staff to discuss the approach for developing and submitting map(s) occurred on April 8, 2024. Based on meeting discussions, Countywide Program staff revised the draft (regional) guidance on how MRP Permittees should address this requirement in April and May 2024. The Bay Area Municipal Stormwater (BAMS) Trash Subcommittee decided to use ArcGIS Online (AGOL) Map Viewer as the tool to present the Revised Trash Generation Maps within the FY 23-24 Annual Report. This format allows for consistent resolution when zoomed in and out, ease of layer updates, and ease of viewability for all viewers. To view the maps, an AGOL license is required. BAMS Trash Subcommittee participants met with Regional Water Board staff on May 30, 2024, to discuss the draft final regional guidance. The final supplemental guidance document was approved by Regional Water Board staff and distributed to MRP Permittees in June 2024. SMCWPPP staff assisted with developing the Revised Trash Generation Maps for each SMCWPPP Permittee. A link which allows Regional Water Board staff to view the map(s) is provided in San Mateo County Permittee FY 2023/24 Annual Reports.

Litter Work Group

SMCWPPP's Litter Work Group, which was formed in March 2014, was integrated into the SMCWPPP Trash Subcommittee in FY 2023/24. Coordination on litter reduction efforts and other trash/litter issues related to MRP 3.0 compliance, is now discussed at Trash Subcommittee meetings. Topics discussed in FY 2023/24 include efforts by SMCWPPP, waste and stormwater program staff from San Mateo County Permittees, the San Mateo Countywide Recycling Committee, and franchised waste collection and processing companies serving those jurisdictions. During FY 2023/24, the Program shared information on regional, state, and federal topics, including foodware reuse and reduction programs, legislation, illegal dumping, and guidance documents.

Coordination with San Mateo Countywide Recycling Committee

To increase coordination among solid waste and recycling programs and San Mateo County Permittee MS4 trash reduction activities, Countywide Program staff began attending Countywide Recycling Committee meetings in FY 2012/13. SMCWPPP continued to coordinate with the Recycling Committee in FY 2023/24, specifically targeting outreach and coordination with municipally solid waste/recyclables haulers in San Mateo County to reduce trash impacts associated with inadequate waste container management. Countywide Program staff also coordinated with the Recycling Committee on collection activities, PCBs and demolition regulations, litter reduction and zero waste building design and operation, source reduction policies, and zero waste programs.

BAMSC Trash Full Capture System Impracticability Report (C.10.e)

Permit Provision C.10.e specifies that MRP Permittees may collectively submit a programmatic Trash Impracticability Report that describes the conditions under which it is impracticable to control trash via full trash capture devices. To guide the development of the report, the BAMS Collaborative formed the Trash Impracticability Work Group in September 2022. San Mateo County staff participated in three Work Group meetings held in October 2022, December 2022, and February 2023. The final draft report entitled *Trash Full Capture System Impracticability Report (Report)* was approved by the BAMS Steering Committee on March 23, 2023, for submittal to the Water Board's Executive Officer by March 31, 2023. The Report provides information to improve the successful planning and implementation of control measures to address trash in stormwater. Information provided in the Report is based on a current understanding of the feasibility of siting, designing, installing, and maintaining the types of full trash capture systems certified by the State Water Resources Control Board as of March 2023. It was gained through a survey of BAMS Collaborative members and engineers that design and construct/install these types of systems. On August 14, 2023, Countywide Program Managers received comments on the Report from Regional Water Board staff. Possible next steps were discussed with BAMSC Steering Committee meeting participants in August 2023, and subsequently with Regional Water Board staff. Based on these discussions, the BAMSC Trash Impracticability Work Group and Steering Committee agreed to address these comments via the trash information item scheduled for a Regional Water Board meeting in 2024.

FUTURE ACTIONS

FY 2023/24 activities that are planned by SMCWPPP to assist San Mateo County Permittees comply with MRP Provision C.10 requirements include the following:

- Continued facilitation of SMCWPPP Trash Subcommittee meetings;
- Conduct a series of tasks designed to assist San Mateo County Permittees with the achievement of the 100% trash load reduction or no adverse impact benchmark required by MRP 3.0.
- Continued implementation of the SMCWPPP trash assessment strategy designed to demonstrate progress towards MRP 3.0 trash load reduction goals;
- Continued maintenance of SMCWPPP Trash Load Reduction Dashboard;
- Continued support for long-term plan implementation and control actions for trash management, including guidance on updating/revising Long-term Plans consistent with MRP 3.0 requirements;
- Continued calculation and reporting on trash load reductions for each San Mateo County Permittee;
- Continued calculation and reporting on the amount and types of trash removed via creek and/or shoreline cleanups;
- Continued update/revision of trash generation and full capture system maps and GIS data layers in preparation for the FY 2023/24 Annual Report submittal;
- Continued sharing of information on regional, state, and federal litter-related topics including foodware reuse and reduction programs, legislation, illegal dumping, and guidance documents;
- Continued coordination and information sharing with the SMCWPPP PIP Subcommittee on countywide litter reduction efforts;

- Continued coordination and information sharing with the Zero Litter Initiative in Santa Clara County;
- Continued coordination with Caltrans for trash capture device design review, purchase, installation, and maintenance agreements; and
- Continued coordination with the New Development Subcommittee (and State and Regional Water Board staff) on the trash load reduction benefits of LID facilities.

SECTION 11/12

C.11/12 MERCURY/PCBs CONTROLS

INTRODUCTION

Provisions C.11 and C.12 of the MRP require Permittees to implement control programs to reduce the stormwater impacts of mercury and PCBs on San Francisco Bay (Bay). The Water Board has previously determined that stormwater discharges of these legacy pollutants have contributed to exceedances of water quality objectives (WQOs) and that associated beneficial uses of the Bay are not achieved. The Water Board has therefore adopted water quality attainment strategies called Total Maximum Daily Loads (TMDLs) that assign pollutant load reductions (through waste load allocations) to Bay Area municipal stormwater dischargers. Provisions C.11 and C.12 implement the urban runoff requirements of the mercury and PCBs TMDLs.

The control programs and other actions that Provisions C.11 and C.12 require Permittees to implement during the permit term include the following:

- Assess Mercury and PCBs Load Reductions from Stormwater (C.11/12.a);
- Program for Source Property Identification and Abatement (C.11/12.b);
- Program for Control Measure Implementation in Old Industrial Areas (C.11/12.c);
- Mercury Collection and Recycling Implemented throughout the Region (C.11.d);
- Program for Controlling PCBs from Bridges and Overpasses (C.12.d);
- Program for Controlling PCBs from Electrical Utilities (C.12.e);
- Plan and Implement Green Stormwater Infrastructure to reduce Mercury and PCBs Loads (C.11.e/C.12.f);
- Manage PCBs-Containing Materials and Wastes During Building Demolition Activities (C.12.g);
- Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations (C.11.f/C.12.h);
- Fate and Transport Study of Mercury and PCBs: Urban Runoff Impact on San Francisco Bay Margins (C.11.g/C.12.i); and
- Risk Reduction Program for Mercury and PCBs (C.11.h/C.12.j).

During FY 2023/24, Provisions C.11 and C.12 requirements were addressed primarily at three levels: directly by San Mateo County Permittees, at the countywide level via SMCWPPP, and/or at the regional level via the BAMSC. MRP mercury and PCBs requirements are similar due to similarities in the control programs for these sediment-associated and legacy pollutants. Therefore, descriptions of the activities conducted in compliance with the Provisions C.11 and C.12 requirements are grouped into this single section of the SMCWPPP Annual Report.

The remainder of this section is organized by the sub-provisions in C.11 and C.12. The subsections below briefly describe the requirements in each sub-provision and summarize the compliance activities conducted during FY 2023/24 at the Permittee, Countywide Program (SMCWPPP), and/or regional (BAMSC) levels to address these requirements.

IMPLEMENTATION OF MRP PROVISIONS

C.11/12.a Assess Mercury and PCBs Load Reductions from Stormwater

Permit Requirements

Provisions C.11/12.a require Permittees to implement an assessment methodology and data collection program to quantify mercury and PCBs loads reduced through implementation of all controls described in Provisions C.11/12. At the end of the previous permit term, SMCWPPP submitted a TMDL Control Measure Implementation and Reasonable Assurance Analysis (RAA) report to the Water Board that describes the calculation methodologies, data requirements, and model parameters used to quantify mercury and PCBs loads reduced for each type of control measure identified in Provisions C.11/12 (SMCWPPP 2020¹). Permittees will continue to use these methods to quantify the mercury and PCBs load reductions achieved through all controls implemented during the permit term as described in Provisions C.11/12.b through C.11.e and C.12.g. To comply with the detailed requirements in the permit for reporting on the mercury and PCBs control programs, San Mateo County Permittees have developed a *Mercury and PCBs Control Measures Report* that will be updated each year of the permit term. Version 2.0 of this report is included in Appendix 11. The report provides or will provide the following:

- Each Year of the Permit:
 - Documentation to confirm that all control measures effectuated during the previous permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction; and
 - Documentation to demonstrate the status of control measure implementation during the current permit term, updated each year of the permit.
- In the 2026 Annual Report:
 - Mercury and PCBs load reductions achieved through implementation of controls since the beginning of the permit term, and estimates of the load reductions from controls taking place through the end of the permit term, including all supporting data to substantiate the load reduction estimates; and
 - Refinements to the measurement and estimation methodologies to assess mercury and PCBs load reductions from control measures in the subsequent permit for Water Board EO approval.

Progress During FY 2023/24

During FY 2023/24, all control measures effectuated during the previous permit term for which load reduction credit was recognized continued to be implemented at an intensity sufficient to maintain the

¹ San Mateo County Water Pollution Prevention Program (SMCWPPP), 2020. Pollutant Control Measures Implementation Plan and Reasonable Assurance Analysis for San Mateo County, California. September 30, 2020.

credited load reduction. Documentation of these controls is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11).

C.11/12.b Program for Source Property Identification and Abatement

Permit Requirements

Provisions C.11/12.b require San Mateo County Permittees to investigate, using both conventional sampling and laboratory analysis techniques, at least 1,411 acres of land areas during the MRP 3.0 permit term that likely contribute mercury and/or PCBs² to MS4s. These investigations are focusing on land areas where industrial activities occurred prior to 1980 and continue today (i.e., old industrial land use areas that have not been redeveloped). For properties or land areas found to be contributing substantial amounts of mercury or PCBs or where high mercury or PCBs concentrations are found (generally areas with sediment concentrations greater than 0.5 mg/kg), Permittees will take actions to abate the mercury and PCBs sources into their MS4s or refer the properties to the Water Board for follow-up measures. For each source property referred to the Water Board, Permittees will implement interim enhanced Operation and Maintenance (O&M) measures in the street or storm drain infrastructure adjacent to the referred source property or implement stormwater treatment downstream of the property. Provisions C.11/12.b reporting requirements include the following:

- In each Annual Report through 2026, Permittees are required to:
 - Report progress on the acreage of land areas investigated, including progress toward investigation of the 1,411 acres of old industrial land uses in San Mateo County. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement, etc.). Permittees are required to submit all supporting data and information including referral reports.
 - Report on ongoing enhanced O&M activities associated with all past contaminated property referrals.
- In the 2026 Annual Report:
 - Report on total acreage of land area investigated, area and description of properties referred, description of enhanced O&M measures, and the estimated total mercury and PCBs mass load reduced (consistent with the approved accounting procedures) resulting from implementing this control measure.

Progress During FY 2023/24

During FY 2023/24, the Countywide Program (on behalf of San Mateo County Permittees) continued to investigate old industrial land areas in San Mateo County using a tiered investigation process, similar to the process used during previous permit terms. The process generally includes screening relatively large areas (i.e., catchment or sub-catchment areas) via MS4 stormwater runoff or sediment samples. Areas that do not have elevated mercury or PCBs are generally deemed unlikely to be sources and are not further investigated. Areas with elevated mercury or PCBs (i.e., approximately ≥ 0.3 mg/kg mercury

² PCBs, with regards to source property identification and abatement, refers to the total sum of the Regional Monitoring Program (RMP) 40 PCB congeners. The RMP 40 PCB congeners include: PCB-8, PCB-18, PCB-28, PCB-31, PCB-33, PCB-44, PCB-49, PCB-52, PCB-56, PCB-60, PCB-66, PCB-70, PCB-74, PCB-87, PCB-95, PCB-97, PCB-99, PCB-101, PCB-105, PCB-110, PCB-118, PCB-128, PCB-132, PCB-138, PCB-141, PCB-149, PCB-151, PCB-153, PCB-156, PCB-158, PCB-170, PCB-174, PCB-177, PCB-180, PCB-183, PCB-187, PCB-194, PCB-195, PCB-201, PCB-203.

concentrations or ≥ 0.2 mg/kg PCBs concentrations) may be targeted for additional investigation aimed at identifying specific properties that are likely contributing to elevated concentrations in the catchment. Samples are collected in the MS4 from locations that drain one or more specific properties. Depending on where the samples were collected, properties may be identified as a source of mercury or PCBs to the MS4 based on these public ROW samples. However, in some cases on-site investigation of specific properties may be required to identify sources. When feasible, this level of investigation involves on-site inspections at suspect properties to determine potential sources and pathways of sediment bound pollutants from the property to the MS4 and collection of sediment samples on the property. This process was described in more detail in SMCWPPP (2024).³

The source property investigation related efforts conducted by SMCWPPP on behalf of San Mateo County Permittees during FY 2023/24 included the following actions:

- Desktop Evaluation and Field Reconnaissance to Identify Potential Sediment and/or Stormwater Runoff Sample Stations. During FY 2023/24, the Countywide Program conducted desktop review of parcel and MS4 infrastructure in GIS, Google Earth, and street view to identify likely stormwater flow pathways within catchments of interest and to begin to identify potential sites within the MS4 where screening level sediment and/or stormwater runoff samples could be collected. This desktop review was followed by field reconnaissance of some of these areas to better understand flow pathways through catchments and from parcels into the MS4, confirm locations of storm drain structures where samples (MS4 sediment or stormwater) could be collected, and to develop sampling plans. During FY 2023/24, Countywide Program staff conducted desktop review and field reconnaissance in seven catchments with old industrial land uses in the Cities of Millbrae, San Bruno and South San Francisco. These efforts included review of approximately **360 acres** of old industrial land use parcels, and identified potential sample locations for the MS4 sediment and stormwater runoff samples that were collected during FY 2023/24 as described below, and for samples that will be collected during the next fiscal year.
- Stormwater Sampling. One stormwater runoff sample was collected from the catchment outlet of WMA 1005B during the 2023/24 wet weather season to screen for elevated mercury or PCBs in this WMA. This sample screened nearly 800 acres in the Cities of San Bruno and Millbrae, including **43 acres** of unaddressed old industrial parcels. The chemical analysis results were not available from the laboratories by the end of the fiscal year. Once the results are available, the Program will determine if the catchment has elevated mercury or PCBs that will require further investigation to identify specific source areas or properties.
- Public ROW MS4 Sediment Sampling. MS4 sediment samples were collected in the late summer of 2023 and again in spring 2024. These samples were collected in locations that drain one or more old industrial parcels, as described below.
 - WMAs 358 and 1011 (South San Francisco). Eight MS4 sediment samples were collected in August 2023 in WMA 358 and a portion of the adjacent WMA 1011 in the City of South San Francisco. WMA 358 is a 32-acre catchment containing mostly old industrial parcels. A previous sample collected in 2015 found high PCBs (1.5 mg/kg) in a catch basin in this WMA. However, four follow-up samples collected in 2017 and 2019 failed to pinpoint the source of elevated PCBs. The samples collected in FY 2023/24 were collected in locations

³ Revised Pollutant Control Measure Plan to Reduce PCBs And Mercury in Urban Runoff from Old Industrial Areas in San Mateo County, California, Plan and Schedule for Control Measure Implementation during MRP 3, SMCWPPP, March 31, 2024.

that drained **24-acres** of old industrial parcels in these WMAs. However, all eight sediment samples had low PCBs. Thus, the efforts to-date have not identified specific parcels associated with the elevated PCBs found in 2015. Next steps for this catchment may include on-site sampling to better target specific properties.

- WMAs 294, 314, 315 (South San Francisco). Twenty MS4 sediment samples were collected in adjacent WMAs 294, 314 and 315 in June 2024. These samples were collected from locations that drained about **108 acres** of old industrial parcels. Previous stormwater samples collected at the outfalls of each of these catchments had elevated PCBs. The analytical results of the FY 2023/24 samples were not yet available at the time this report was completed. Next steps for these catchments will be determined once the analytical results are available.
 - WMA 290 (San Bruno). Eight MS4 sediment samples were collected in WMA 290 in June 2024 as a follow-up to finding elevated PCBs in a stormwater samples collected near the catchment outfall during FY 2022/23. The eight samples were collected from locations that drain **16-acres** of old industrial parcels. The analytical results of the FY 2023/24 samples were not yet available at the time this report was completed. Next steps for these catchments will be determined once the analytical results are available.
- Reporting. The results for all samples that were collected during Water Year (WY) 2023 (i.e., Oct 1, 2022 – Sept 30, 2023) were reported in the Program’s WY 2023 Urban Creeks Monitoring Report (UCMR) that was submitted to the Regional Water Board in March 2024. The sampling results for all samples that were collected during WY 2024 (i.e., Oct 1 2023 – Sept 30 2024) will be reported in the Program’s WY 2024 UCMR that will be submitted to the Regional Water Board in March 2025.
 - Continued Planning for Source Investigations during FY 2023/24. Once the pending sampling results are available, the Program will review the data and other information collected in FY 2023/24 to determine next steps for the catchments and properties that were investigated. The Program has also started planning for new source investigations during FY 2024/25. The Program plans to continue screening-level stormwater and public ROW sediment sampling in old industrial areas according to the schedule outlined in the SMCWPPP Old Industrial Area Control Measure Plan (SMCWPPP 2024)². However, if feasible if resources are available, the Program is currently considering options to increase the pace of investigations to complete all remaining public ROW investigations by the end of 2025. In addition, the Countywide Program worked with San Mateo County Permittees during FY 2023/24 to develop program enhancements including on-site inspections and sample collection on private properties. SMCWPPP plans to begin implementing on-site inspections and sampling early in FY 2024/25.

All required documentation to demonstrate implementation of the Source Investigation and Abatement control program in San Mateo County during the current Permit term is provided in the Mercury and PCBs Control Measures Report (Appendix 11).

C.11/12.c Program for Control Measure Implementation in Old Industrial Areas

Permit Requirements

San Mateo County MRP Permittees are required, during the permit term, to implement or cause to be implemented control measures to address 445 acres of old industrial land use areas at 70% control

measure efficiency, or through accounting for the mass reduction of 19 g/yr of mercury and 81 g/yr of PCBs. Reporting requirements include the following:

- Submit plans and schedules for implementing controls in old industrial areas by March 31, 2023.
- In each Annual Report starting in 2023, Permittees are required to submit an account of the controls implemented consistent with the plan submitted in March 2023, and any modifications thereto. Reporting shall include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.
- In the 2026 Annual Report, Permittees are required to report on all control measures and stormwater diversion measures implemented during the permit term and provide the total acreage treated and an estimate of the total mercury and PCBs mass loads reduced resulting from this implementation.

Progress During FY 2023/24

Old Industrial Area Control Measures Plan

During FY 2023/24, Permittees worked with Program staff to develop a revised Old Industrial Control Measure Plan (OICMP) per the requirements of Provisions C.11/12.c and which addresses comments provided by Water Board staff on the OICMP submitted in March 2023. The Revised OICMP builds upon the March 2023 version and adds additional details and commitment to actions to clearly demonstrate that the required C.11/12.c mercury and PCBs load reduction targets will be met.

In order to develop the OICMP, the Program first developed a complete dataset of all old industrial parcels draining to an MS4 within San Mateo County. The Program then conducted a thorough analysis of existing data to identify both the treatment status and the PCBs monitoring status for each old industrial parcel. This information was documented in a database, and will be updated each year to reflect new data. The treatment status for each parcel was based on available data on whether the parcel had been redeveloped since 2002, and/or treated with green infrastructure (GI). The monitoring status for each parcel was determined based on MS4 and/or stormwater samples that were collected in locations that drain a given parcel. Parcels that drained to locations that had low PCBs (< 0.2 mg/kg) were categorized as “Low PCBs”, indicating these parcels were unlikely sources of elevated PCBs to the MS4. Parcels that drained to locations that had elevated PCBs (≥ 0.2 mg/kg) were categorized as “Moderate PCBs” (≥ 0.2 mg/kg to < 0.5 mg/kg) or “High PCBs” (≥ 0.5 mg/kg). Parcels that were not associated with any samples were categorized as “No Monitoring Data”.

The Revised OICMP describes the new and enhanced controls that Permittees anticipate will be implemented in old industrial land use areas in San Mateo County during the permit term to achieve the mercury and PCBs load reductions required by MRP C.11/12.c. The OICMP presents the status of current planning efforts, the anticipated load reductions, and implementation schedules for the following four types of control measures:

- Source Area Investigation and Abatement:
 - Highly Elevated Source PCBs Properties
 - Moderately Elevated PCBs Properties
- Green Infrastructure (GI):
 - Parcel-based Low Impact Development (LID)

- Public Green Streets and Regional GI Projects
 - Other Stormwater Treatment Measures (i.e., High-Flow Capacity systems and inlet-based devices), and
 - Enhanced Operation and Maintenance Activities.

The Program, on behalf of all SMCWPPP Permittees submitted the Revised OICMP to the Water Board on March 31, 2024 (SMCWPPP 2024)². The *Mercury and PCBs Control Measure Report* (Appendix 11) documents the control measures that were implemented in San Mateo County consistent with the plan during FY 2023/24, and provides maps of the areas treated, the acreage of catchments addressed, and a description of all control measures within each treated catchment. Additional information on control measure planning and implementation in old industrial areas during FY 2023/24 is presented below.

Development of a Program to Address Moderate PCBs-contaminated Properties (MPCPs).

During FY 2023/24, the Program continued working with SMCWPPP Permittees to develop and begin implementing a new program that was described in the OICMP to identify and address MPCPs. The new program includes additional efforts to conduct on-site inspections, collect samples on private properties, and address properties found to contribute moderate PCBs to MS4s. The Countywide Program and SMCWPPP Permittees met multiple times throughout the year to discuss and further develop the details of the MPCP program, including how it should be implemented to optimize resources and improve outcomes. The new MPCP program is described in detail in the OICMP (SMCWPPP 2024)². A primary component of this new program includes enhanced efforts to identify moderate and high PCBs properties by conducting on-site sampling of suspect properties. Properties with moderate PCBs on-site will then be addressed through the new MPCP abatement program, which will require Permittees to work directly with the property owner(s) to implement controls on the property to prevent the release of PCBs from the property. Properties with high PCBs on-site will continue to be addressed through the existing referral programs.

During FY 2023/24, the Program began working with the City of San Carlos to start planning for on-site sampling at several suspect properties. On-site sampling is currently planned for early in FY2024/25. The Program also identified additional Permittees where on-site sampling will be planned during the next fiscal year. The Program anticipates the outcomes of the planned on-site sampling will identify new MPCPs during the next fiscal year.

GI and Other Treatment Controls in Old Industrial / Moderate PCBs Areas

GI facilities that treat old industrial land uses have been implemented across San Mateo County as a result of stormwater requirements issued to new and redevelopment projects. Although Permittees have little control over the pace and extent to which private redevelopment in old industrial areas occurs, as redevelopment projects are permitted, Permittees continue to ensure that stormwater treatment controls are incorporated into these projects on both public and private lands. During FY 2023/24, Permittees have continued to track the installation of GI facilities across San Mateo County to ensure proper maintenance and operation, and to assist with demonstrating pollutant load reductions.

San Mateo County Permittees have also conducted a number of key planning and evaluation efforts to support future implementation of public GI projects in San Mateo County, including development of the San Mateo County Stormwater Resource Plan in 2017⁴, Permittee-specific Green Infrastructure Plans completed in 2019, and an additional countywide analysis completed in 2022 of regional stormwater

⁴ Available here: <https://ccag.ca.gov/srp/>

capture project opportunities based on key performance indicators, including control of PCBs. The guidance, tools, project concepts, and prioritized project opportunity maps developed through these efforts provide a foundation for public GI planning and implementation during MRP 3.0. It is important to note that these countywide analyses and planning efforts have illustrated the challenges with identifying old industrial land use areas or other areas with moderate/high PCBs that are feasible and cost-effective to treat via GI in the public ROW. Despite the comprehensive countywide evaluation and screening processes conducted in San Mateo County, which included potential for PCBs load reduction as a priority screening factor, the potential for PCBs load reduction via feasible public ROW GI opportunities identified to date, including green streets and regional stormwater capture projects, has been relatively small.

During FY 2023/24, San Mateo County Permittees have continued to implement public GI projects across San Mateo County including via implementation of their GI plans. Permittees have also continued to track the installation of private and public GI facilities to ensure proper maintenance and operation and to assist with demonstrating pollutant load reductions. Section 3 of this Annual Report provides additional information about green street and regional stormwater capture GI projects in San Mateo County.

San Mateo County Permittees have also continued to plan and install other stormwater treatment systems (e.g., large high-flow capacity systems and small inlet-based devices) in public ROW locations that drain old industrial land use and other land use areas. During development of the OICMP, Countywide Program staff prioritized potential locations for future device installation in old industrial land use areas that also have moderate, high, or very-high trash generation. These planning efforts will continue during the next fiscal year and will likely result in the increased installation of full trash capture devices in locations that treat old industrial land uses.

Additional reporting on GI and other stormwater treatment control projects that were completed through the end of FY 2023/24 is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11). The information provided in Appendix 11 includes supporting data and information needed to calculate the mercury and PCBs loads reduced, including descriptions of the projects, maps of the areas treated, and the acreages treated within each catchment by land use category. It should be noted that information available for the current reporting year is considered preliminary, as the data on all projects completed in FY 2023/24 may not be available until after this report is finalized. Permittees will continue to gather this information as it becomes available and submit it in subsequent Annual Reports.

C.11.d Mercury Collection and Recycling Implemented throughout the Region

Permit Requirements

Permittees are required to promote, facilitate, and/or participate in collection and recycling of mercury containing consumer products, devices, and equipment to increase effectiveness and public participation. Permittees must report on the following in each of the 2023 through 2026 Annual Reports:

- Efforts to promote recycling of mercury-containing products;
- Efforts to increase effectiveness of those recycling efforts; and
- The mass of mercury-containing material collected throughout the county along with an estimate of the mass of mercury contained in recycled material using the methodology contained in load reduction accounting system described and cited in the Fact Sheet.

Many types of devices and equipment (e.g., thermometers, switches, and fluorescent lamps) can contain mercury. When these devices are not adequately managed at their end-of-life, mercury can be released into the environment and become available to stormwater runoff. Control measures currently implemented by Permittees that address the potential for mercury releases include: 1) the support of policies and laws that reduce the mass of mercury in specific devices/equipment; and 2) the implementation of recycling programs that reduce the risk of mercury from being released at the end-of-life of these devices and equipment.

Progress During FY 2023/24

San Mateo County municipalities and the public continue to participate in the San Mateo County Health Department's Household Hazardous Waste (HHW) Program and Very Small Quantity Generator Business Collection (VSQG) Program. The HHW Program offers residents the opportunity to drop-off mercury-containing devices and equipment and other hazardous wastes at designated drop-off points or drop-off events free of charge. The VSQG Program provides an inexpensive hazardous waste disposal option to eligible businesses, non-profits, and other government agencies that generate less than 100 kilograms of waste per month. It operates by appointment only and charges a fee to cover the cost of transportation and disposal. Many San Mateo County municipal agencies promote the availability of the HHW Program and VSQG Program on their agency websites. Some retail stores in San Mateo County were also accepting some mercury-containing devices for the public, but some of those business programs stopped accepting discarded devices from the public in November of 2023.

In FY 2023/24, the County programs collected a total of 51,558 linear feet of fluorescent lamps and 3,942 compact fluorescent lamps. In addition, these programs also collected the following mercury-containing devices and equipment during FY 2023/24:

- 22 Thermostats;
- 120 Mercury Thermometers; and
- 3 Switches

The estimated mass of mercury collected via these activities during MRP 3.0 to date is reported in the *Mercury and PCBs Control Measure Report* (Appendix 11).

C.12.d Program for Controlling PCBs from Bridges and Overpasses

Permit Requirements

Permittees are required to implement a Caltrans specification to manage, as part of bridge and overpass roadway replacement or major repair, potential PCBs-containing materials in bridge roadway expansion joints. The Caltrans specification is currently under development through a proposed requirement in Caltrans stormwater permit. Six months after availability of the specification, Permittees must begin to implement or cause to be implemented the Caltrans specification during applicable replacement activities that are under the direction of the Permittee. Permittees are required to report the following:

- In the Annual Report immediately following availability of the specification, provide a description of the Caltrans specification for managing PCBs-containing materials in bridge or roadway expansion joints during roadway replacement or repair;
- In the 2023 Annual Report, submit an inventory of bridges in the program area that includes bridge ownership and the bridge roadway replacement schedule;

- In the 2024 through 2026 Annual Reports, submit documentation confirming the use of the Caltrans specification (once it is available) during all instances of bridge roadway replacement or repair in their jurisdiction during that reporting year and provide an estimate of the volume of material managed and total PCBs mass load reduced resulting from implementation of the specification.
- In the 2026 Annual Report, report an estimate of the total PCBs mass load reduced, consistent with approved accounting procedures, resulting from implementing this control measure.

Progress During FY 2023/24

During FY 2023/24, San Mateo County Permittees have continued to track the development of the Caltrans specification through participation in BAMSC meetings and inquiries to Caltrans and Water Board staff. Currently, the Caltrans specification is still under development. Caltrans provided a draft *Standard Operating Procedure (SOP) for Inspecting, Removing and Reporting Materials Containing Polychlorinated Biphenyls (PCBs) Prior to Demolition or Renovation of Structures* to the Water Board during the previous fiscal year. This draft is currently undergoing review by both State and Regional Water Board Staff. During the next few months, the Countywide Program anticipates a revised version will be made available for a 30-day public comment period, revised as needed in response to comments, and then finalized. Permittees will continue to track the progress of this SOP and, six months after it becomes available, will be prepared to implement the Caltrans specification during bridge and roadway overpass replacement and major repairs. Future Annual Reports will document the use of the Caltrans specification (once it is finalized and available) during all instances of bridge roadway replacement or repair within San Mateo County Permittees' jurisdictions.

C.12.e Program for Controlling PCBs from Electrical Utilities

Permit Requirements

Permittees are required to develop and implement a program to manage PCBs in oil-filled electrical equipment (OFEE) for municipally owned electrical utilities in the MRP program area and collaborate with the Water Board to determine PCBs loadings in OFEE from non-municipally owned electrical utilities. Reporting requirements include the following:

- In every Annual Report beginning in 2023:
 - A summary of the actions undertaken during that reporting year that remove municipally owned PCBs-containing OFEE along with the loads avoided and the details of the calculations and assumptions used to estimate the load reduced.
- In the 2023 Annual Report:
 - Estimated PCBs loads avoided (along with supporting documentation) resulting from the removal of municipally-owned PCBs-containing OFEE through maintenance programs and system upgrades for the period 2002 to the beginning of this permit term (2023).
 - A description of the improved spill response and reporting practices implemented by municipally owned electrical utilities.
- In the 2024 Annual Report, submit a summary of plans to maintain and upgrade OFEE for municipally owned electrical utilities.
- In the 2026 Annual Report, submit the estimated PCBs loads reduced during the permit term

associated with municipally owned OFEE removal resulting from maintenance programs and system upgrades.

- Within 12-months of the Water Board transmitting to the Permittees information from the non-municipally owned electrical utilities, Permittees shall submit a report discussing the following, to the extent possible given any data limitations: (a) locations of the PCBs-containing OFEE still in service, (b) previous locations of PCBs-containing OFEE, and (c) opportunities to improve non-municipally owned electrical utilities' standard operating procedures for spill response, reporting, cleanup, and sampling and analysis

Progress During FY 2023/24

San Mateo County does not have any municipally owned electrical utilities. Thus, most of the above MRP requirements do not apply to San Mateo County Permittees. However, during FY 2023/24, Countywide Program staff tracked the activities of the BAMSC Municipal Electrical Utility Workgroup (Workgroup), which was formed at the start of MRP 3.0 to facilitate implementation of the requirements in this sub-provision and ensure coordination across the MRP area. There are four municipal electrical utilities across the MRP area, including the following:

- Alameda Municipal Power, Alameda CA
- City of Palo Alto Utilities (CPAU), Palo Alto CA
- Pittsburg Power Company dba Island Energy, Pittsburg CA
- Silicon Valley Power (SVP), Santa Clara CA

The BAMSC Workgroup included representatives from countywide stormwater programs and staff from each of the above municipal electrical utilities. During FY 2023/24, the Workgroup met once in May 2024 to discuss each municipal utility's plans to maintain and upgrade their OFEE. These plans are submitted for each of the above municipal electrical utilities with their countywide program Annual Reports.

As of the end of FY 2023/24, the Water Board had not transmitted information from the non-municipally owned electrical utilities to the Permittees. Based on updates obtained from Water Board staff during recent BAMSC Monitoring and Pollutants of Concern (MPC) Sub-committee meetings, Water Board staff are planning to meet with representatives from Pacific Gas and Electric (PG&E), the primary non-municipally owned electrical utility that operates in the MRP area, and plan to continue to engage PG&E on this topic during the next fiscal year.

C.11.e/C.12.f Plan and Implement Green Infrastructure (GI) to Reduce Mercury and PCBs Loads

Permit Requirements

Permittees are required to implement GI projects consistent with the requirements in Provision C.3.j during the permit term. Reporting on this sub-provision will be required in the 2026 Annual Report, and will include the following information for all GI projects implemented during the permit term:

- A summary description of the projects including GI type, location, and area;
- The total acreage treated; and
- Estimates of the total mercury and PCBs mass load reduced resulting from this implementation.

Progress During FY 2023/24

As discussed previously, San Mateo County Permittees have conducted a number of key planning and evaluation efforts to support future implementation of public GI projects in San Mateo County, including development of the San Mateo County Stormwater Resource Plan in 2017, Permittee-specific Green Infrastructure Plans completed in 2019, and an additional countywide analysis completed in 2022 of regional stormwater capture project opportunities based on key performance indicators, including control of PCBs. The guidance, tools, project concepts, and prioritized project opportunity maps developed through these efforts provide a foundation for public GI planning and implementation during MRP 3.0. It is important to note that these countywide analyses and planning efforts have illustrated the challenges with identifying old industrial land use areas or other areas with moderate/high PCBs that are feasible and cost-effective to treat via GI in the public ROW. Despite the comprehensive countywide evaluation and screening processes conducted in San Mateo County, which included potential for PCBs load reduction as a priority screening factor, the potential for PCBs load reduction via feasible public ROW GI opportunities identified to date, including green streets and regional stormwater capture projects, has been relatively small.

During FY 2023/24, San Mateo County Permittees have continued to implement public GI projects across San Mateo County including via implementation of their GI plans. Permittees have also continued to track the installation of private and public GI facilities to ensure proper maintenance and operation and to assist with demonstrating pollutant load reductions. Section 3 of this Annual Report provides additional information about green street and regional stormwater capture GI projects in San Mateo County.

As noted earlier, additional reporting on GI and other stormwater treatment control projects that were completed through the end of FY 2023/24 is provided in the *Mercury and PCBs Control Measures Report* (Appendix 11). The information provided in Appendix 11 includes supporting data and information needed to calculate the mercury and PCBs loads reduced, including descriptions of the projects, maps of the areas treated, and the acreages treated within each catchment by land use category. It should be noted that information available for the current reporting year is considered preliminary, as the data on all projects completed in FY 2023/24 may not be available until after this report is finalized in September 2024. Permittees will continue to gather this information as it becomes available and include it in subsequent Annual Reports.

C.12.g Manage PCBs-Containing Materials and Wastes During Building Demolition Activities

Permit Requirements

Permittees are required to continue to implement the protocols developed during the previous permit term for managing PCB-containing materials and wastes during building demolition so that PCBs do not enter MS4s. In addition, new requirements that become effective during FY 2023/24 include the following:

- Beginning July 1, 2023, for Applicable Structures containing building materials with PCBs \geq 50 ppm, Permittee requirements include:
 - Require demolition contractors to provide notification to the Permittee, the Water Board, and US EPA at least one week before any demolition is to occur;

- Enhance Permittee’s construction site control programs to minimize migration of PCBs into the MS4 during demolition activities; and
 - For permits approved after July 1, 2023, verify that PCBs in demolished buildings are properly managed to minimize transport to the MS4 by obtaining official documentation that the building materials with PCBs ≥ 50 ppm were disposed appropriately according to state and federal regulations.
- Beginning with the 2023/24 rainy season, Permittees are required to inspect demolition sites with Applicable Structures containing building materials with PCBs ≥ 50 ppm pursuant to Provision C.6 to ensure that effective construction pollutant controls are used to prevent discharge into the MS4.

Reporting requirements include the following:

- Permittees seeking exemption from Provision C.12.g. requirements based on lack of Applicable Structures must submit documentation, such as historic maps or other historic records, that clearly demonstrates that the only structures that existed pre-1980 were single-family residential and/or wood-frame structures; and
- In their 2023 Annual Report, Permittees shall discuss enhancements to their construction site control program to minimize migration of PCBs from demolition activities into the MS4.
- Beginning with their 2023 Annual Report, the Permittees are required to provide each of the following items:
 1. The number of Applicable Structures that applied for a demolition permit during the reporting year;
 2. A running list of the Applicable Structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, and the concentration of PCBs in each sample;
 3. For each Applicable Structure, with PCBs concentrations ≥ 50 mg/kg, include the following: the project address, the demolition date, and a brief description of the PCBs-containing materials; and
 4. For each structure that was constructed or remodeled between the years 1950 and 1980 and requires emergency demolition to protect public health and/or safety, provide the following: address, date building was constructed, and date of demolition.
- Beginning with their 2024 Annual Report, Permittees are required to provide the following: whether the site was inspected during demolition, and for those cases where notification and advance approval from the U.S. EPA is not required and were approved for demolition after June 30, 2023, the hazardous waste manifest prepared for transportation of the material to a disposal facility;
- In their 2026 Annual Report, Permittees are required to submit an evaluation of the effectiveness of the protocol for controlling PCBs during building demolition as well as supporting data. This should be conducted and reported at the regional level on behalf of all Permittees and shall be considered the Report of Waste Discharge for Provision C.12.g. for the next permit reissuance; and
- In their 2026 Annual Report, Permittees may submit for use in the subsequent permit term an

updated assessment methodology and data collection program to quantify PCBs loads reduced through implementation of the protocol for controlling PCBs-containing materials and wastes during demolition of Applicable Structures.

Progress During FY 2023/24

During FY 2023/24, Permittees continued to implement the protocols developed during the previous permit term for managing PCB-containing materials and wastes during building demolition so that PCBs do not enter MS4s. Permittees also developed the required enhancements to their protocols to address new requirements in MRP 3.0 Provision C.12.g, following the guidance developed by BAMSC during the previous fiscal year (Construction Site Control Program Enhancement Options for Demolition Sites Subject to the PCBs Management Program, Technical Memorandum to Bay Area Municipal Stormwater Collaborative Steering Committee, May 1, 2023). The enhancement options that each Permittee began implementing as of July 1, 2023 are described in each Permittee's FY 2023/24 Annual Report.

In addition, the Program developed a technical memorandum that addresses other FY 2023/24 reporting requirements in Provision C.12.g. (*Program for Management of PCBs during Building Demolition – Data Summary through FY 2023/24 for San Mateo County MRP Permittees*). The technical memorandum is included as an attachment to Appendix 11. This memorandum documents the following items for San Mateo County Permittees:

- The number of demolition permits issued for Applicable Structures during FY 2023/24, which is the fifth year of the program (data from FY 2019/20 through FY 2022/23, the first through fourth years of the program, are also included);
- A running list of the Applicable Structures for which a demolition permit was applied (since July 1, 2019, the date the PCBs control program began implementation) that had material(s) with total PCBs concentration ≥ 50 ppm, with the address and demolition date for each structure; and
- For FY 2023/24 samples with total PCBs concentration ≥ 50 ppm, the PCBs concentration in each sample and a brief description of PCBs-containing materials that were sampled.

C.11.f/C.12.h Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocations

Permit Requirements

MRP 3.0 requires that Permittees evaluate the effectiveness of all mercury and PCBs control measures in the 2020 Mercury and PCBs Control Measure Plan and Reasonable Assurance Analysis (RAA) that was submitted during the previous permit term and update the RAA as necessary. Updates can focus on those control measures for which new information is available and for control measures not evaluated in previous efforts. Permittees are also required to prepare detailed implementation plans for all control measures to be implemented and inform permit requirements during the subsequent permit term. These long-term plans must:

1. Identify all technically and economically feasible PCBs control measures to be implemented (including GSI projects);
2. Include a schedule according to which these technically and economically feasible control measures will be fully implemented; and

3. Provide an evaluation and quantification of the PCBs load reduction of such measures as well as an evaluation of costs, control measure efficiency and significant environmental impacts resulting from their implementation.

Additionally, Permittees must identify all specific control measures to be implemented, the intensity of control measure implementation, and the estimated load reduction benefit from control measures implemented during the subsequent permit term. This implementation plan must include:

- Identification of all control measures implemented during the current permit term and any additional control measures to be implemented in the subsequent permit term;
- A description of the intensity or extent of control measure implementation (e.g., acres treated, acres investigated for source areas, types of roadway projects for which protocols applied);
- Identification of accountability metrics to track during the subsequent permit corresponding to the proposed implementation intensity; and
- Estimates for load reductions to be achieved through implementation of control measures during subsequent permit term at the proposed intensity.

Permittees must submit the updated plan and schedule no later than March 31, 2026.

Progress During FY 2023/24

During FY 2023/24, San Mateo County Permittees continued to track all control measures implemented to reduce mercury and PCBs stormwater loads in the County. San Mateo County Permittees will continue to track control measure implementation and gather other data needed to update the Control Measure Implementation Plan and RAA by March 31, 2026. All available data on control measures implemented to reduce mercury and PCBs during FY 2023/24 are provided in the *Mercury and PCBs Control Measure Report* (Appendix 11). The information available for the current reporting year is considered preliminary, as the data on all projects completed in FY 2023/24 may not be available until after annual reporting. San Mateo County Permittees will continue to gather this information as it becomes available and subsequent Annual Reports will be updated as needed.

C.11.g./C.12.i Fate and Transport Study of Mercury and PCBs: Urban Runoff Impact on San Francisco Bay Margins

Permit Requirements

MRP 3.0 requires Permittees to conduct or cause to be conducted studies concerning the fate, transport, and biological uptake of mercury and PCBs discharged from urban runoff to San Francisco Bay margin areas. The studies should focus on near-shore areas contaminated with mercury and PCBs from historical activity and the expected trajectory of recovery as sources from local watersheds are reduced. Reporting requirements include the following:

- In the 2023 Annual Report:
 - Submit a workplan describing the specific manner in which these information needs will be accomplished and describing the studies to be performed with a preliminary schedule, and
 - Report on status of the studies.

- In the March 31, 2026, Integrated Monitoring Report:
 - Findings and results of the studies completed, planned, or in progress as well as implications of studies on potential control measures to be investigated, piloted, or implemented in future permit cycles.

Progress During FY 2023/24

Permittees are addressing Provisions C.11.g and C.12.i through a multi-year project by the San Francisco Bay (Bay) Regional Monitoring Program (RMP) to identify, model, and investigate embayments along the Bay shoreline designated “Priority Margin Units” (PMUs). BAMSC developed a Work Plan for the fate and transport study of mercury and PCBs during MRP 3.0, which was submitted with the Program’s 2023 Annual Report. During FY 2023/24, Program staff have continued to participate in the RMP PCBs Workgroup to help oversee this work and guide it towards developing information that will inform implementing controls for mercury and PCBs in stormwater runoff and reducing the Bay’s impairment by these pollutants. During FY 2024/25 and through the remainder of the MRP 3.0 permit term, Countywide Program staff will continue to participate in the RMP PCBs Work Group to help oversee the project. The findings and results of the project will be reported in the March 2026 Integrated Monitoring Report.

C.11.h./C.12.j Implement a Risk Reduction Program

Permit Requirements

MRP 3.0 requires Permittees to conduct an ongoing risk reduction program to address public health impacts of mercury and PCBs in San Francisco Bay/Delta fish. The fish risk reduction program must take actions to reduce actual and potential health risks to those people and communities most likely to consume San Francisco Bay-caught fish, such as subsistence anglers and their families. The risk reduction framework developed in the previous permit term, which funded community-based organizations to develop and deliver appropriate communications to appropriately targeted individuals and communities, is an appropriate approach. Permittees should work with local health departments, the Bay Area Clean Water Agencies, and the Western States Petroleum Association to leverage resources for this program and to appropriately target at-risk populations. At a minimum, the Risk Reduction Program must have the potential to reach 3,000 individuals annually who are likely consumers of San Francisco Bay-caught fish. Reporting requirements include:

- In each Annual Report, Permittees shall report on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.
- In the 2026 Annual Report, Permittees shall report the findings of the effectiveness evaluation of their risk reduction program.

Progress During FY 2023/24

SMCWPPP is assisting San Mateo County municipalities comply with the risk reduction program requirements by coordinating with and reporting on the [Fish Smart program](#) conducted by San Mateo County Environmental Health Services (EHS). Fish Smart builds upon the San Francisco Bay Fish Project (sfei.org/sfbfp#sthash.eOcfwrhA.dpbs), a risk reduction framework developed regionally in the previous permit term. The Fish Project funded Bay Area community-based organizations to develop and deliver

appropriate communications to appropriately targeted individuals and communities about how to reduce their exposure to mercury and PCBs from consuming San Francisco Bay fish.

During FY 2023/24, EHS continued to conduct a variety of activities that target at-risk populations (e.g., subsistence fisherman) via the Fish Smart program. The accomplishments of the Fish Smart program during FY 2023/24 are summarized below.

- Participated in an audit with the California Department of Public Health (CDPH) to ensure all new signs were hung and intact.
- Maintained new Fish Smart guideline signs at all locations.
- Began Common Core and Next Generation Science Standards (NGSS) alignment of Youth Education Program.
- Tabled at six in-person events to promote the Fish Smart Program.

The summary illustrates the Fish Smart program's success during this past fiscal year in providing outreach about potential health impacts of consuming certain types of fish caught in San Francisco Bay. It is likely these efforts have led to reduced health risks in those people and communities most likely to consume San Francisco Bay-caught fish, such as subsistence fishers and their families.

FUTURE ACTIONS

During FY 2024/25, Countywide Program staff will continue to assist San Mateo County Permittees comply with all mercury and PCBs control program requirements, as described above.

SECTION 13

C.13 COPPER CONTROLS

INTRODUCTION

Provision C.13 of the MRP addresses copper control measures identified in the San Francisco Bay Basin Water Quality Control Plan (commonly referred to as the Basin Plan). The Regional Water Board has deemed these controls are necessary to support copper site-specific objectives in San Francisco Bay. C.13 includes the following sub-provisions:

- C.13.a. Manage waste generated from cleaning and treating copper architectural features, including copper roofs, during construction and post-construction;
- C.13.b. Manage discharges from pools, spas and fountains that contain copper-based chemicals; and
- C.13.c. Industrial Sources.

In FY 2023/24, Permittees and the Countywide Program continued to conduct activities related to complying with Provision C.13. Local copper control actions are documented in each Permittee's individual Annual Report. This section summarizes related activities conducted by the Countywide Program.

IMPLEMENTATION OF MRP PROVISIONS

C.13.a. Copper Architectural Features

Provision C.13.a. requires Permittees to manage waste from cleaning and treating copper architectural features, including copper roofs, during construction and post-construction.

A SMCWPPP factsheet entitled *Requirements for Architectural Copper: Protect water quality during installation, cleaning, treating, and washing!* targets suppliers and installers of copper materials and is available on the SMCWPPP website (flowstobay.org).

C.13.b. Manage Discharges from Pools, Spas and Fountains

Provision C.13.b. requires Permittees to manage discharges from pools, spas and fountains that contain copper-based chemicals by adopting local ordinances. These requirements are implemented by individual Permittees and are reported on in their Annual Reports. Guidance on these requirements for illicit discharge inspectors is provided through SMCWPPP's CII Subcommittee and public outreach on related BMPs is provided through SMCWPPP's PIP Subcommittee. A fact sheet entitled *Best Management Practices for Pools, Hot Tubs, and Fountain Water Discharges* includes information on avoiding the use of copper-based algaecides. The [fact sheet](#) is available on the SMCWPPP website (flowstobay.org). Section 15 discusses related public outreach by SMCWPPP to promote pool, spa, and fountain discharge BMPs through social media posts. In FY 2023/24 the requirements in this Provision were presented at the June

13, 2024 SMCWPPP Business and Illicit Discharge Stormwater Inspector Training Workshop described in Section 4.

C.13.c. Industrial Sources

Provision C.13.c. requires Permittees to ensure through routine industrial facility inspections that proper BMPs are in place at industrial facilities likely to use copper or have sources of copper. SMCWPPP's CII Subcommittee assists San Mateo County municipal agency staff with understanding this MRP requirement and SMCWPPP develops MRP compliance support materials, as necessary. In addition, in June 2010 BASMAA developed pollutants of concern commercial/industrial inspector training materials and a guidance manual. These documents address industrial sources of copper and are available on SMCWPPP's members only website. In FY 2023/24 the requirements in this Provision were presented at the June 13, 2024 SMCWPPP Business and Illicit Discharge Stormwater Inspector Training Workshop described in Section 4.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees comply with MRP Provision C.13 requirements include the following:

- Continue to provide information on MRP requirements regarding architectural sources of copper to construction site and building inspectors at New Development Subcommittee meetings, construction site stormwater inspector training workshops and materials, and at presentations to CALBIG or other partner organizations;
- Continue to provide outreach material and guidance via SMCWPPP's CII and PIP Subcommittees regarding pool, spa, and fountain discharge BMPs; and
- Provide guidance to San Mateo County Permittees via SMCWPPP's CII Subcommittee and/or SMCWPPP stormwater business inspector training workshops and materials to assist them with conducting routine industrial facility inspections that ensure proper BMPs are in place at industrial facilities likely to use copper or have sources of copper.



SECTION 15

C.15 EXEMPTED AND CONDITIONALLY EXEMPTED DISCHARGES

INTRODUCTION

The objective of MRP Provision C.15, Exempted and Conditionally Exempted Discharges, is to exempt unpolluted non-stormwater discharges from the MRP's general non-stormwater discharge prohibition (Provision A.1) and to conditionally exempt non-stormwater discharges that are potential sources of pollutants. This section describes SMCWPPP's countywide activities conducted to help its member agencies implement this provision. SMCWPPP helps municipal staff understand the MRP's requirements and makes various MRP compliance support materials available for their use. The SMCWPPP CII Subcommittee, discussed in Section 4, facilitates and coordinates providing this assistance to the member agencies for a variety of different types of non-stormwater discharges that may be conditionally exempted. The requirements of this Provision were included in the SMCWPPP CII business and illicit discharge stormwater inspector training workshop held in June 2024.

In addition, during FY 2023/24 SMCWPPP's PIP component conducted selected activities to help San Mateo County Permittees comply with public outreach requirements in Provision C.15.b.iv. Individual Residential Car Washing Discharge, C.15.b.v. Swimming Pool, Hot Tub, Spa and Fountain Water, and Provision C.15.b.vi. Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering. These activities are described below.

IMPLEMENTATION OF MRP PROVISIONS

Provision C.15.b.iii. Emergency Discharges of Firefighting Water and Foam

Permittees are required to collectively convene a regionwide Firefighting Discharges Work Group to identify and evaluate opportunities to reduce the impacts of discharges to the MS4 associated with emergency firefighting activities. During FY 2022/23, SMCWPPP surveyed the CII Subcommittee for stormwater program and fire department representatives that would like to participate in the BAMSC Firefighting Discharges Work Group. Countywide Program staff actively participated in the March 14 and June 1, 2023 Work Group meetings. The BAMSC Work Group developed a draft Project Profile with tasks and schedule for a regional collaborative project to develop a Regional Firefighting Discharges Report, per the MRP requirement.

In FY 2023/24, SMCWPPP provided in-kind support to the BAMSC project of regional benefit to jointly develop a Regional Firefighting Discharges Report and hold two Regional Work Group meetings. SMCWPPP assisted to organize, facilitate and participate in the March 26 and June 17, 2024 Work Group meetings. The Work Group consists of representatives from regulatory agencies (EPA and Regional Water Board), stormwater programs and Fire Departments, including representatives from San Mateo County stormwater programs and fire departments. SMCWPPP also assisted to organize and participate in two



Task Force meetings in February and April 2024. The Task Force is a smaller, working group that reviews deliverables and identifies topics and questions to facilitate information sharing in the larger Regional Work Group.

Countywide Program staff provided information on the Work Group activities to the CII Subcommittee. At the CII Subcommittee December 2023 meeting the group discussed the requirement to evaluate the adequacy of large industrial facilities' BMPs/SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters. Guidance for the evaluation of BMPs/SOPs may be developed as part of the Regional BMP Report. However, the Subcommittee began discussing how to identify the "large industrial sites such as IGP sites, gas plants, gas concentration facilities, and chemical plants" identified in the MRP. The agenda packet included a list, by SIC codes, of industrial facilities in the MRP jurisdictions downloaded from SMARTS. Program staff provided a table of suggested SIC codes that would capture gas plants, gas concentration facilities and chemical plants as specified in the MRP. The specific industrial facilities with these SIC codes in SMCWPPP Permittee jurisdictions were provided in a table with the agenda packet. The Subcommittee discussed the types of industrial facilities that should be addressed, additional criteria to SIC codes that should be considered and possible size thresholds. Discussions continued in the May 2024 Subcommittee meeting.

Provision C.15.b.iv. Individual Residential Car Washing

During FY 2023/24, SMCWPPP continued previous years' outreach efforts through social media posts to encourage residents to use professional car wash companies rather than washing their cars at home (Figures 15-1 and 15-2). The practice of using commercial car washes helps keep soaps, automotive pollutants, and environmental toxins from washing into San Mateo County storm drains. Through social media posts, residents were directed to learn more about why they should choose car wash companies and best practices to use at home if they need to wash at home. The SMCWPPP web page shown in Figure 15-3 received 305 pageviews in FY 2023/24.

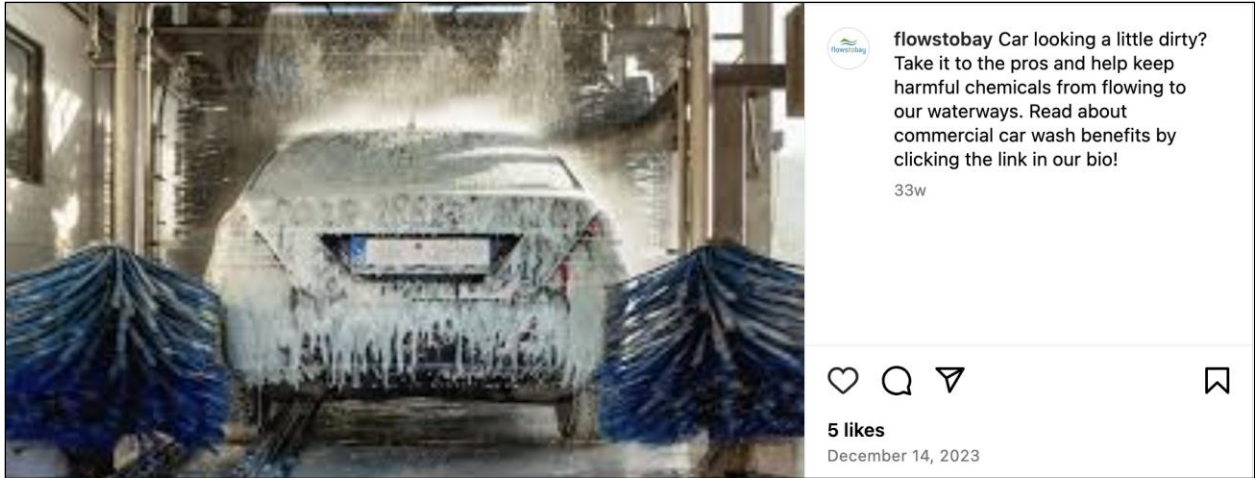


Figure 15-1. Examples of Instagram posts about car washing

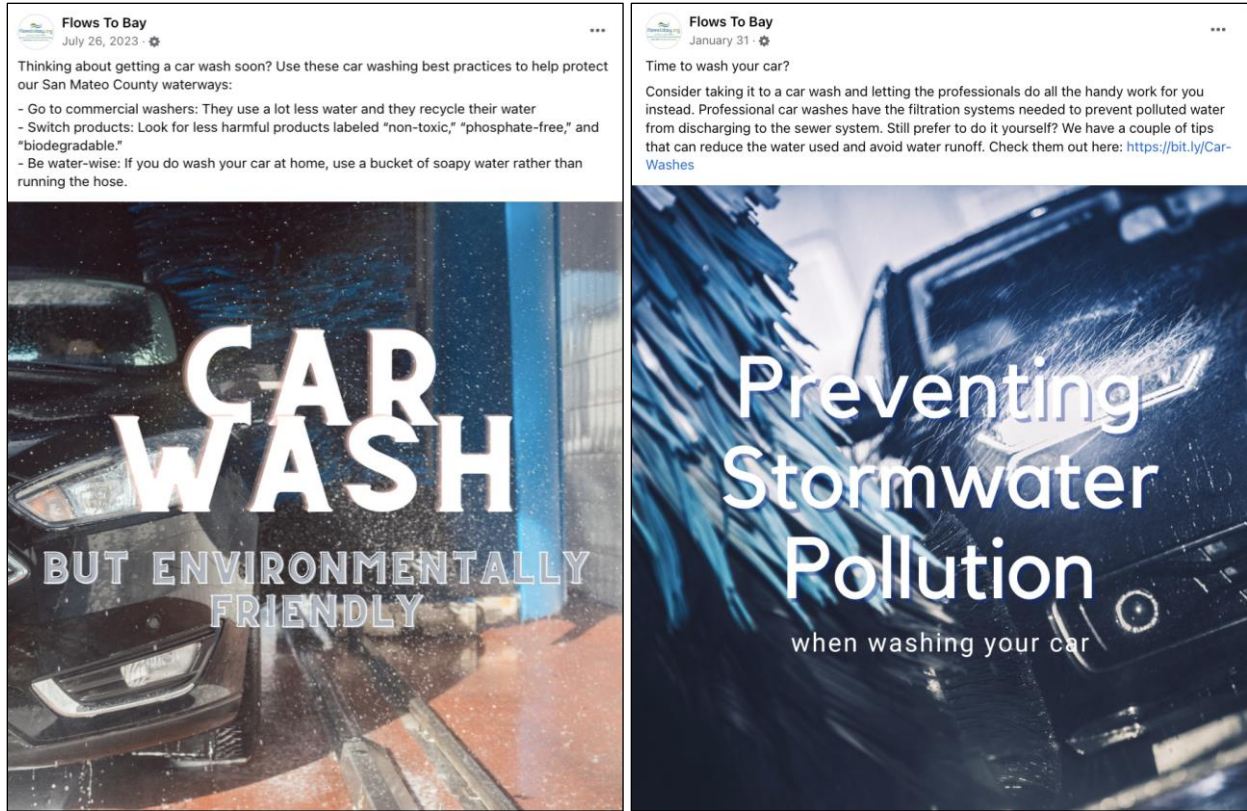


Figure 15-2. Examples of Facebook posts about car washing

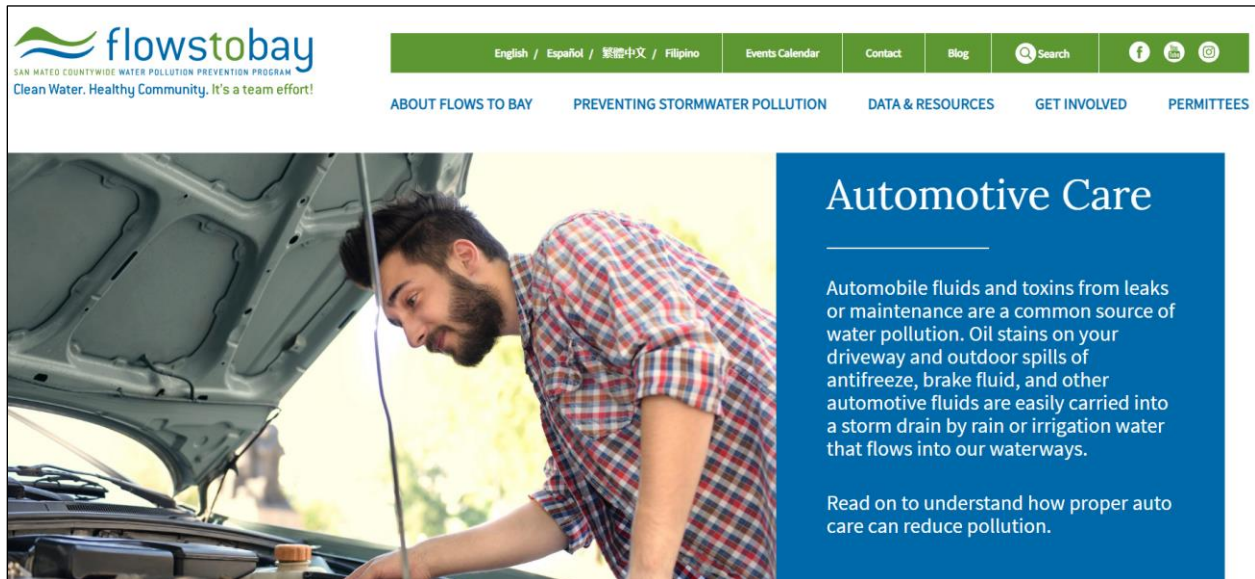


Figure 15-3. Automotive maintenance webpage



Provision C.15.b.v. Swimming Pool, Hot Tub, Spa, and Fountain Water Discharges

During FY 2023/24, SMCWPPP continued public outreach and educational efforts to encourage the implementation of appropriate BMPs in commercial, municipal, and residential facilities. SMCWPPP shared with member agencies BMP fact sheets that specifically target swimming pools, hot tubs, spas, and fountain water discharges (Figure 15-4) and also made the information available to read and download on their [website](#). Best practices were also promoted through social media posts (Figure 15-5).



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SAN MATEO COUNTYWIDE
WATER POLLUTION PREVENTION PROGRAM
Clean Water. Healthy Community.

BEST MANAGEMENT PRACTICES FOR

SWIMMING POOLS, HOT TUBS & FOUNTAIN WATER DISCHARGES

Homeowners | Landscapers | Swimming Pool/Spa Service Workers | Contractors

Information about using Best Management Practices (BMPs) to prevent swimming pool, hot tub, and fountain waters from entering storm drain systems and polluting local waterways.

WHY SHOULD WE BE CONCERNED WITH POOL, HOT TUBS, AND FOUNTAIN WATER DISPOSAL?

Water from pools, hot tubs, and fountains is NOT just water. It also may contain potential pollutant sources such as chlorine, copper, algaecides, colored dye, chemicals/salts that are harmful to our creeks and waterways. You may never drain your pool water in the street or storm drain system, even if the water is dechlorinated.

Federal, State, and local regulations prohibit discharge of anything but rain water in the storm drain.

Implementing the proper Best Management Practices (BMPs) is easy and is required for compliance with stormwater pollution prevention regulations.

CLEANING

- Never clean a filter in the street, gutter, or storm drain.
- Rinse cartridge filters onto a dirt area and spade filter residue into the soil.
- Keep backwash discharges out of the street and storm drain. Backwash sand and diatomaceous earth filters onto a dirt area. Dispose of spent filter materials in the trash.
- If you don't have a suitable dirt area, contact your wastewater treatment authority listed on the back of this flier for instructions on discharging to the sanitary sewer.

DRAINING

- Never drain into a street, gutter or storm drain.
- Discharge water to a sanitary sewer clean-out.
- If you are on a septic system or have no sanitary sewer clean-out, contact your wastewater treatment authority listed in this brochure for guidance.

MATERIAL STORAGE & HANDLING

- Store chemicals in a clean, dry and covered area.
- If landscaping materials are left outside, cover with a tarp or plastic sheeting to protect from urban runoff.

A PROPERLY MAINTAINED POOL, HOT TUB, AND FOUNTAIN WILL REDUCE THE NEED FOR DRAINING

MAINTAINING

- Clean regularly, maintain proper chlorine levels and maintain water filtration and circulation.
- Manage pH and water hardness to minimize copper pipe corrosion that can stain your pool and end up in our creeks and the Bay.
- Minimize algae buildup to prevent the need for toxic algaecides.
- Ask your pool maintenance service for help resolving persistent algae problems without using copper algaecides.

DID YOU KNOW...?

Copper is a pollutant that threatens aquatic life in our creeks and the Bay. It is used as an algaecide in pools, spas and fountains, and copper pipes are commonly used in pool plumbing.



flowstobay.org

For More Information About Stormwater Pollution Prevention email info@flowstobay.org



BEST MANAGEMENT PRACTICES FOR **SWIMMING POOLS, HOT TUBS & FOUNTAIN WATER DISCHARGES**
Homeowners | Landscapers | Swimming Pool/Spa Service Workers | Contractors

Protect the Bay, the Ocean, and Yourself! Keep swimming pools, hot tub, and fountain water out of storm drains, creeks, and the Bay.

DOING THE JOB RIGHT: CHECKLIST OF BMPS

- Never drain your pool water into the street or storm drain system, even if the water is dechlorinated.
- Always drain your residential pool water into a sewer line. For convenience, use the sewer clean-out connection in your yard.
- You can also access the sewer system drain in your toilet, bathtub or sink inside your home. Be cautious that you do not flood your home if you use this option.
- If you are on a septic system or have no sanitary sewer clean-out, contact your wastewater treatment authority listed in this flier for guidance.
- Filters should be cleaned and rinsed over a dirt area or all rinse water should be captured and filtered to remove any solids prior to being discharged into the sewer system.
- Keep backwash discharges out of the street and storm drain. Backwash sand and diatomaceous earth filters onto a dirt area. Dispose of spent filter materials in the trash.
- Rinse cartridge filters onto a dirt area and spade filter residue into the soil.
- If you don't have a suitable dirt area, contact your wastewater treatment authority listed in this brochure for instructions on discharging to the sanitary sewer.

4 TIPS FOR FINDING YOUR CLEAN-OUT

Sanitary sewer clean-outs are most often found along the sewer line, which is usually aligned with the sewer lines for the house. However, not all cities use the same method to mark their sewer systems. If you have trouble locating your clean-out, contact your local wastewater treatment authority. See the "Local Pollution Control Agencies" below.

1. Look for an "S" stamped into the curb or sidewalk near your house. It marks where the sewer line is. Your clean-out may be along it.
2. Look for a slight linear depression in your yard between your house and the street. This is often an indicator of the location of a sewer line, and your clean-out may be on it.
3. If your kitchen or bathroom is on an exterior wall, look outside along that wall for the clean-out.
4. Stand on the sidewalk looking toward your house. Line up the main water sources in your house (bathrooms, kitchens, washers, etc.) The clean-out is often located on that line, in front of or behind your house.

Local Pollution Control Agencies

Burlingame Waste Water Treatment Facility	(650) 342-3727
Millbrae Water Pollution Control Plant	(650) 259-2388
North San Mateo County Sanitation District	(650) 991-8200
Pacific's Calera Creek Water Recycling Plant	(650) 738-4660
San Mateo Waste Water Treatment Plant	(650) 522-7300
Sewer Authority Mid Coastside	(650) 726-0124
South Bayside System Authority	(650) 594-8411 ext. 140
South San Francisco/San Bruno Water Quality Control Plant ...	(650) 877-8555



The San Mateo Countywide Water Pollution Prevention Program acknowledges the Santa Clara Valley Urban Runoff Pollution Prevention Program for developing and sharing the content this brochure.

Figure 15-4. Swimming pool, hot tub, spa, and fountain water discharge BMP fact sheet




San Mateo Countywide Water Pollution Prevention Program

Flows To Bay
January 16 · 🌐

Hot tub weather is upon us. Here are a few reminders on how to maintain your hot tub responsibly:

- Never drain your tub directly into a street, gutter, or storm drain -- you'll be sending chemicals into the Bay.
- Always store chemicals in a clean, dry, and covered area, so they don't spill or leach into the ground.
- Manage pH and water hardness to minimize copper pipe corrosion. Copper stains your pool and can also end up in our waterways.

View more tips and tricks here: <https://bit.ly/Hot-Tub-Care>. And when you've done all of these things...don't forget to sit back, relax, and enjoy!

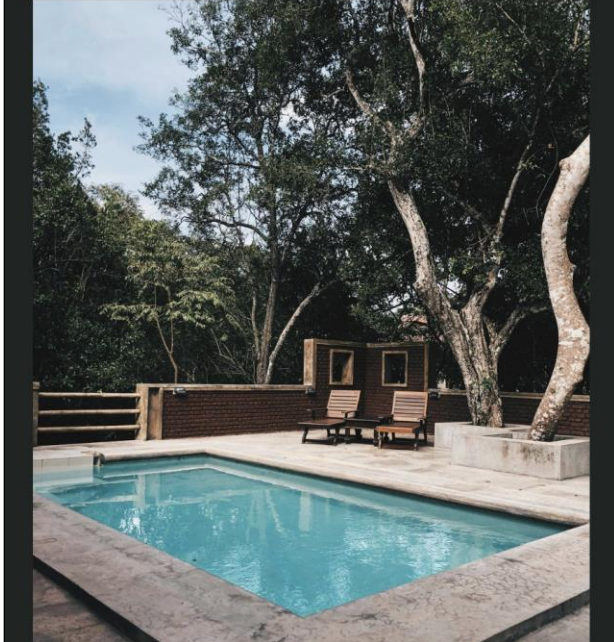


Flows To Bay
April 27 · 🌐

Do you have plans to drain your swimming pool, hot tub, or fountain this spring? Make sure to discharge the water into a sanitary sewer clean-out and NOT into the street or storm drain.

Storm drains flow into our local creeks, the Bay, and Pacific Ocean untreated. If there are chemicals from pools, hot tubs, or fountains that enter our storm drain system, they can make our waterways unsafe for recreational contact and fishing—and unsafe for the living creatures who call these waters home.

Learn more here: bit.ly/Pool-Discharge




Flows To Bay
September 20, 2023 · 🌐

Did you know that hot tubs can contain additional chemicals that are harmful to creek life and water quality?

Beyond regulations prohibiting discharge of treated water into our stormwater systems, hot tub and pool owners should never discharge the water into the street because chlorine, copper, and other chemicals can make their way to local waterways and kill off local species.

Learn more about how to properly discharge your pool water at bit.ly/Pool-Discharge



Flows To Bay
March 25 · 🌐

While hot tub weather is still upon us, here are a few reminders on how to maintain your hot tub responsibly:

- Never drain your tub directly into a street, gutter, or storm drain.
- Always store chemicals in a clean, dry, and covered area.
- Manage pH and water hardness to minimize copper pipe corrosion that can stain your pool and end up in our waterways.

View more maintenance tips here: <https://bit.ly/Hot-Tub-Care>. Now sit back, relax and enjoy!




Figure 15-5. Examples of Facebook posts about swimming pool, hot tub, spa, and fountain water discharge



Provision C.15.b.vi. Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering

In FY 2023/24, SMCWPPP implemented the following outreach activities to promote the use of less-toxic options for pest control and landscape management, and the use of drought tolerant native vegetation to minimize landscape irrigation demands:

- Conducted outreach to San Mateo County residents to support and promote eco-friendly alternatives to toxic pesticides (Figures 15-6 - 15-8; Tables 15-1 and 15-2). The promotion took place on social media, the one IPM webinar conducted in association with San Mateo Arboretum Society, and the SMCWPPP newsletter. Additional messaging was provided through SMCWPPP’s point-of-purchase program, where OWOW materials were distributed to educate residents about eco-friendly pesticide alternatives at 2 tabling events and 12 local hardware stores.
- Continued to promote water-conservation tips via social media and wrote 2 blogs that feature water conservation (Figure 15-9).
- Promoted planting of drought-tolerant, native vegetation through our online media channels, including social media (Figures 15-10 and 15-11, Tables 15-3 and 15-4) and the SMCWPPP newsletter and blogs. Messaging focused on the environmental benefits of planting native plants, including their tolerance to drought (Figure 15-12).

Table 15-1. Summary of Facebook Posts on Pesticide Pollution Prevention Topics

Post Focus	Reach	Engagements (likes, comments, and shares)	Clicks
Integrated Pest Management (13 posts)	3342	31	6
Hiring a Pest Control Operator (2 posts)	536	2	0
Links Between Pesticides & Water Quality (3 posts)	359	5	0

Table 15-2. Summary of Instagram Posts on Pesticide Pollution Prevention Topics

Post Focus	Reach	Engagements (likes, comments, shares, and saves)
Integrated Pest Management (13 posts)	1585	68
Hiring a Pest Control Operator (2 posts)	200	2
Links Between Pesticides & Water Quality (3 posts)	274	8

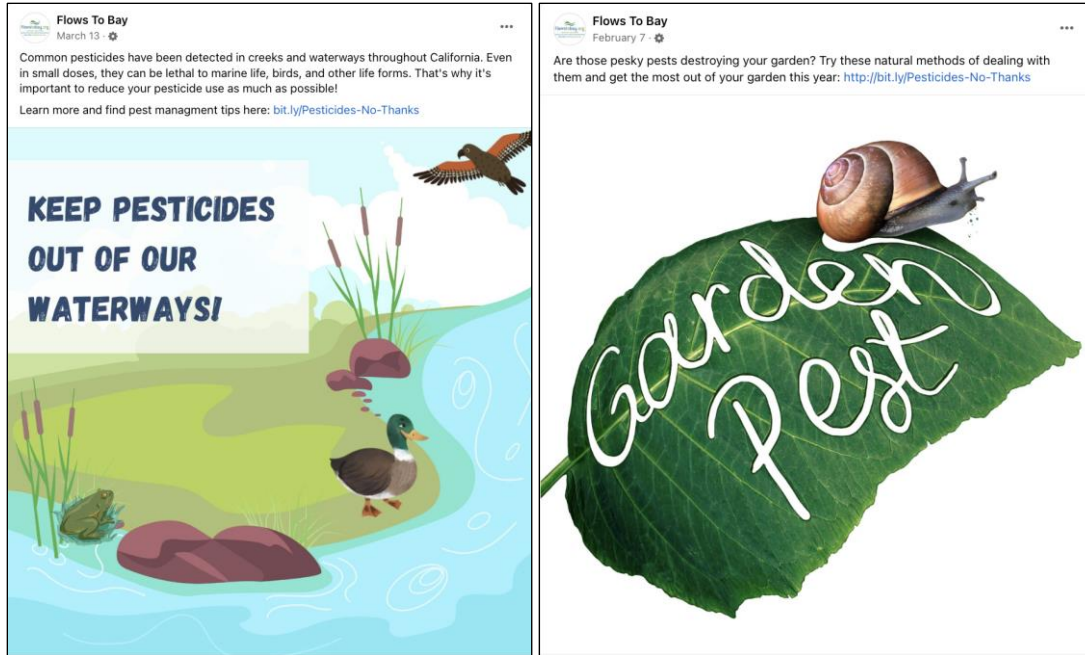


Figure 15-6. Facebook posts on pesticide pollution prevention topics

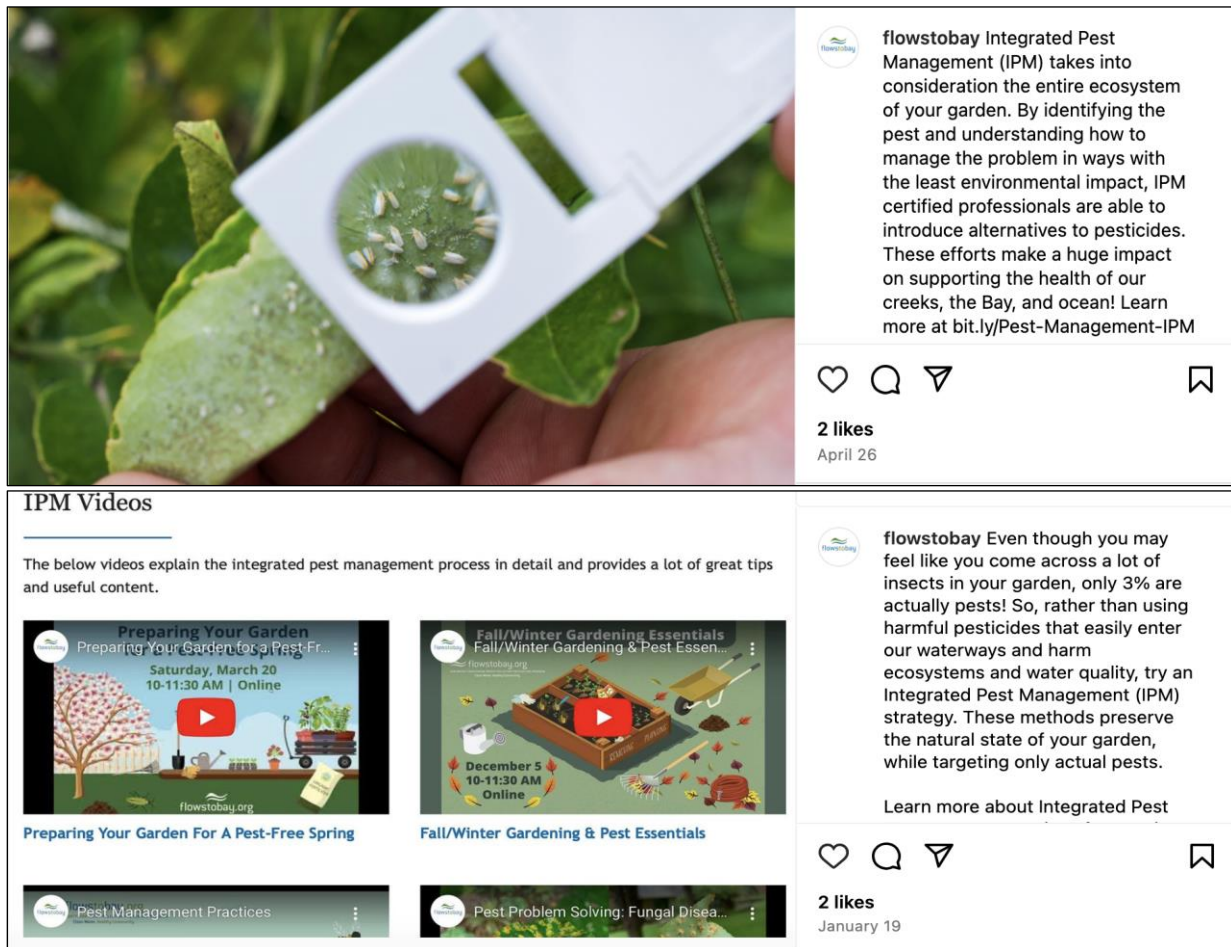


Figure 15-7. Instagram posts on pesticide pollution prevention topics



**ECO-FRIENDLY
WEED MANAGEMENT**

SUNDAY, SEPTEMBER 10
1:00-2:30PM

ATTEND IN-PERSON (LIMITED) OR VIA ZOOM

REGISTRATION REQUIRED

San Mateo Arboretum Society
Come grow with us...

flowstobay.org
SAN MATEO COUNTYWIDE
WATER POLLUTION PREVENTION PROGRAM
Clean Water. Healthy Community.

Figure 15-8. IPM Webinar and Workshop, “Eco-Friendly Weed Management” conducted in collaboration with San Mateo Arboretum Society



Figure 15-9. Screenshots of blogs on SMCWPPP’s website that featured water conservation tips.

Table 15-3. Summary of Facebook Posts Promoting Landscape Management and the Use of Drought-Tolerant, Native Vegetation

Post Focus	Reach	Engagements (likes, comments, and shares)	Clicks
Drought Tolerant, Native Vegetation (7 posts)	2,446	33	1
Best Practices for Hiring Landscape Professionals (4 posts)	1,309	14	0

Table 15-4. Summary of Instagram Posts Promoting Landscape Management and the Use of Drought-Tolerant, Native Vegetation

Post Focus	Reach	Engagements (likes, comments, shares, and saves)
Drought Tolerant, Native Vegetation (7 posts)	668	12
Best Practices for Hiring Landscape Professionals (4 posts)	547	27

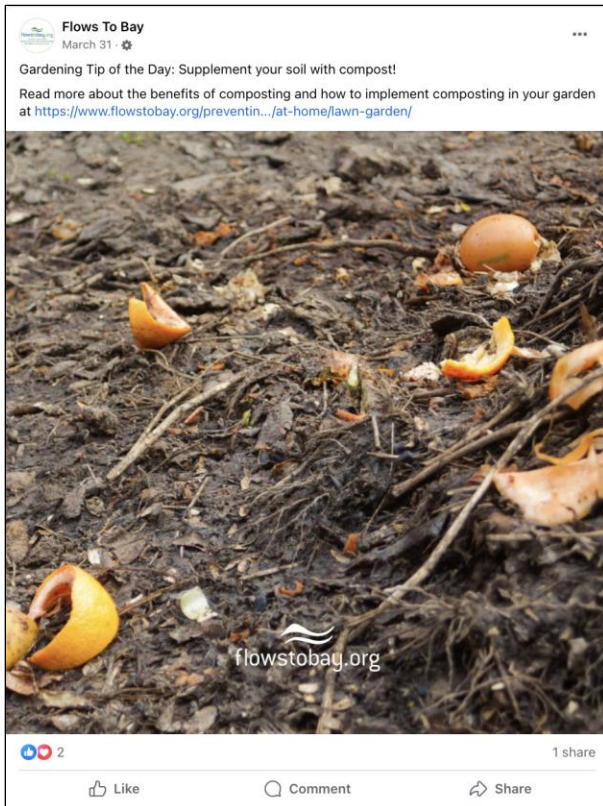
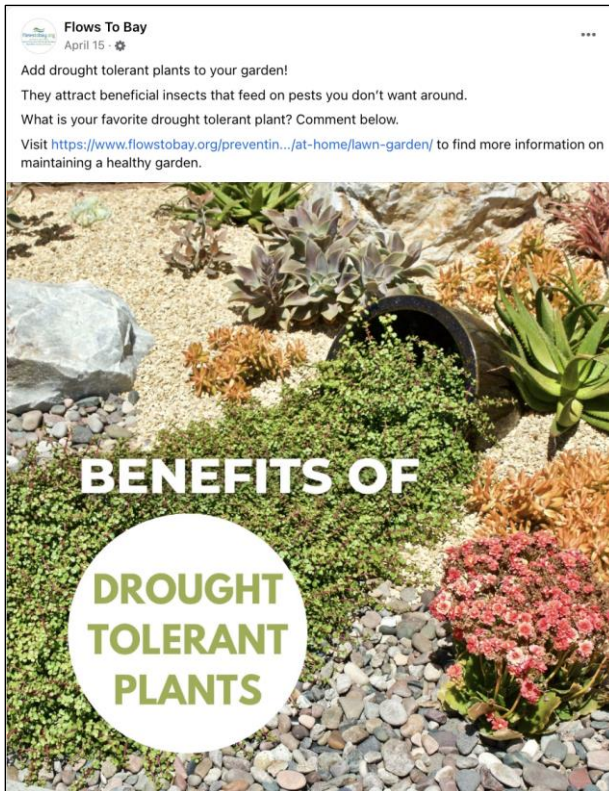


Figure 15-10. Facebook posts promoting landscape management and the use of drought-tolerant, native vegetation.



flowstobay If you're looking for some help with your landscaping projects, make sure to always find professionals who use environmentally-friendly practices. Not every professional will use best practices such as less toxic alternatives to pesticides. So, make sure you hire someone who values principles that keep the health of our waterways and each other in mind. 🌱

For more information on finding responsible professional services click on the link in our bio!

39w

5 likes
October 29, 2023



flowstobay Regenerative landscaping nourishes and gives back to the environment instead of depleting and polluting it. One of the regenerative landscaping principles includes saving water by capturing stormwater, using mulch, and planting drought-resistant plants.

Visit rescapeca.org to learn more and find a directory of qualified regenerative landscapers! @ReScapeCA

27w

3 likes
January 20



flowstobay Use the April showers to feed your native plants! This is an effective way to cut down on potable water usage and reduce your water bill. 🌧️

17w

9 likes
April 1

Figure 15-11. Instagram posts promoting landscape management and the use of drought-tolerant, native vegetation.



The Benefits of California Native Plants

With winter on the horizon and the rainy season among us, now is the time to consider how colder and wetter conditions impact water conservation efforts in our yard and garden. California is still in a drought, so make the most of the gift of rain this season and incorporate native plants into your landscape to maximize the benefits of rain while minimizing rainwater runoff pollution!

San Mateo County receives an average of 24 inches of rain per year, with the rainy season lasting from October to May. During this period, the excess rainwater that does not soak into the ground travels on streets and pavements (also known as impermeable surfaces) and will pick up pollutants along the way into storm drains, which drain into local creeks, the San Francisco Bay, and the Pacific Ocean. Because native plants are best suited for the semi-Mediterranean climate, their deep roots absorb rainwater and prevent runoff from ever reaching these impermeable surfaces.



Rain Garden Before & After

Below are some before and after photos to demonstrate the possibilities! Move the slider left and right to view the images.



Figure 15-12. Screenshots of content on SMCWPPP's website that featured native plants



FUTURE ACTIONS

In FY 2024/25, SMCWPPP will continue to assist member agencies to comply with requirements in the MRP Provision C.15 related to conditionally exempt non-stormwater discharges, including conducting selected types of related outreach. This will include:

- Educational posts featuring automotive care, pools and spas and IPM topics on social media;
- Public-facing webinars focused on IPM and native planting;
- Website content such as blogs highlighting best practices;
- Rain barrel and rain garden water rebate and water conservation promotion through partners and programs; and
- Participation in the Regional BAMSC Firefighting Discharges Work Group, including development of the Regional Report.



SECTION 17

C.17 DISCHARGES ASSOCIATED WITH UNSHELTERED HOMELESS POPULATIONS

INTRODUCTION

Provision C.17, Discharges Associated with Unsheltered Homeless Populations, is a new provision introduced with MRP 3.0. The objective of Provision C.17 is to identify and ensure the implementation of appropriate control measures to address non-stormwater discharges into MS4s associated with unsheltered homeless populations, including discharges from areas where unsheltered people congregate. This section describes SMCWPPP's countywide activities conducted to help San Mateo County Permittees implement this provision. SMCWPPP helps municipal staff understand the MRP's requirements, makes various MRP compliance support materials available for their use and participates, on behalf of its members, in regional groups (e.g., BAMSC Work Group). A SMCWPPP C.17 Work Group was formed in FY 2022/23 to facilitate and coordinate providing this assistance to the Permittees.

IMPLEMENTATION OF MRP PROVISIONS

Provision C.17.a.ii.(1) Unsheltered Homeless Population Map

Permittees were required to submit a map with their FY 2022/23 Annual Report that identified the approximate location(s) of unsheltered homeless populations, storm drain inlets and existing streams, rivers, flood control channels, and other surface water bodies within the Permittee's jurisdiction. The MRP allows the use of biennial point-in-time (PIT) census surveys results to develop the maps. SMCWPPP worked with San Mateo County Human Services Agency (HSA) staff to obtain data from the February 2022 PIT Count and Survey.

The biennial PIT count is designed to meet the United States Department of Housing and Urban Development (HUD) requirements to apply for McKinney-Vento Homeless Assistance funds (also known as Continuum of Care funds) and provide data for local homeless system planning. Approximately 400 volunteers consisting of community-based providers, members of the public, City and County staff, and community expert guides conducted observational counts and surveys of people experiencing unsheltered homelessness in each census tract in the County. The County conducts the count every two years, although the 2021 count was postponed to 2022 due to COVID-19 (*2022 San Mateo County One Day Homeless County and Survey*, August 2022).

SMCWPPP developed a map for each Permittee using the data provided by San Mateo County HSA. Due to privacy and safety concerns raised, the location data were mapped at the census tract level for the



publicly available report. The more specific, but still approximate, location data provided by the HSA was made available to Permittees.

San Mateo County Human Services Agency (HSA) most recently conducted the 2024 One Day Homeless Count on January 25, 2024. The final report is expected to be available in early FY 2023/24. SMCWPPP will work with San Mateo County Human Services Agency to update the Permittee maps submitted in FY 2022/23 with updated point in time unsheltered homeless counts from January 2024 when the data is available.

Provision C.17.a.ii.(2) Regional Best Management Practices Report

To encourage ongoing regional, countywide, and municipal coordination efforts, the MRP required Permittees to collectively develop a best management practice report that identifies effective practices to address non-storm water discharges associated with homelessness into MS4s that impact water quality. The BAMSC formed a Work Group to develop the *Regional BMP Report for Addressing Non-stormwater Discharges Associated with Unsheltered Homeless Populations* (Regional BMP Report). SMCWPPP staff provided in-kind contributions towards the development of the Regional BMP Report and actively participated in the Work Group.

The Regional BMP Report was submitted in the SMCWPPP FY 2022/23 Annual Report. The Regional BMP Report described the BMPs that may be, or are currently being, implemented by Permittees to address discharges associated with homelessness impacting water quality. Each BMP is presented as a Fact Sheet in the BMP Report. The Fact Sheets describe the BMP, goals, limitations, and challenges, and provide local implementation examples.

Coordination Countywide with the County Human Services Agency

SMCWPPP recognizes that identifying BMPs and strategies to manage the water quality impacts associated with unsheltered populations does not inherently address the complex issues contributing to and impacting the chronic homelessness in the County. The San Mateo County Board of Supervisors is committed to preventing homelessness and ensuring anyone who is experiencing homelessness is supported with safe shelter and a pathway to housing. The HSA is the County Department tasked with implementing this vision on behalf of the Board of Supervisors and the San Mateo County Continuum of Care Steering Committee (CoC), a diverse, cross-sectoral body that guides and shapes the countywide response to homelessness. HSA works in close collaboration with other County departments and community partners in these efforts (San Mateo County CoC Strategic Plan on Homelessness, July 2022).

The County's CoC Strategic Plan on Homelessness (July 2022) identifies the programs, initiatives and strategies in place and system improvements for the next three years. The programs and services described include outreach and engagement, shelter/interim housing, housing solutions, prevention assistance, and targeted programs for special populations. The Plan identifies the strategies to accomplish the goals and track progress towards these goals, including reaching functional zero homelessness. SMCWPPP will continue to engage with these organizations whose primary mission is to end homelessness to ensure stormwater agency efforts are supportive and not disruptive of the existing efforts.



Coordination Regionally

To meet the broader goal of coordination regionally, and statewide, BAMSC members coordinate with CASQA and San Diego State University staff on a panel presentation at the CASQA Annual Conference on September 13, 2023. The title of the session was “Unhoused Populations and Water Quality Impacts: Municipal Best Management Practices From the Bay Area and San Diego”. Panelists included Megan Welsh Carroll, PhD from San Diego State University, and Vishakha Atre from EOA, Nicole Wilson from LWA and moderator, Peter Schultze-Allen from EOA representing BAMSC members, including SMCWPPP. The full-capacity session included an excellent discussion with audience members on the challenges of providing cost-effective municipal services for unhoused populations and the related public health, sanitation and human rights issues.

FUTURE ACTIONS

In FY 2024/25, SMCWPPP will assist member agencies to comply with requirements in MRP Provision C.17 related to discharges from unsheltered homeless populations and participate in the BAMSC Work Group. SMCWPPP will work with San Mateo County Human Services Agency to update the Permittee maps submitted in FY 2022/23 with updated point in time unsheltered homeless counts from January 2024.

SECTION 20

C.20 COST REPORTING

INTRODUCTION

Provision C.20 Cost Reporting is a new provision introduced with MRP 3.0. Provision C.20.a. requires each Permittee to annually prepare and submit a fiscal analysis of the capital and operation and maintenance costs incurred to comply with MRP requirements. Provision C.20.b.i. requires Permittees to develop a cost reporting framework and methodology to perform the fiscal analysis. Permittees are encouraged to collaboratively develop the framework and methodology. The framework is required to consider identification of costs incurred solely to comply with MRP requirements as compared to costs shared with other programs or regulatory requirements, provide meaningful data to assess costs of different program areas, and allow for comparisons and to identify trends over time. Provision C.20.c. requires Permittees to submit the cost reporting framework and methodology to the Water Board by June 30, 2023, and to submit their fiscal analyses annually according to the accepted cost reporting framework and methodology starting with the 2025 Annual Report.

In FY 2023/24, SMCWPPP collaborated with other MRP countywide programs through the Bay Area Municipal Stormwater Collaborative (BAMSC) to make updates to the Bay Area Cost Reporting Framework and Guidance Manual to address Regional Water Board comments and coordinate with the State Water Board on the statewide cost reporting policy. This section provides information on this collaborative effort, including the products developed and next steps.

IMPLEMENTATION OF MRP PROVISIONS

Provision C.20.b.i Cost Reporting Implementation

In FY 2022/23, SMCWPPP provided in-kind support to a BAMSC project of regional benefit to jointly develop a cost reporting framework and methodology, along with other BAMSC MRP countywide stormwater programs. The Project Team consisted of consulting firms already under contract to the participating countywide programs (EOA and LWA). Permittees submitted the final Bay Area Cost Reporting Framework (Framework) and Guidance Manual to the Water Board on June 26, 2023, and Water Board staff provided comments on August 11, 2023.

The BAMSC Regional Cost Reporting Work Group (Regional Work Group) held one meeting in FY 2023/24. Representatives of the Program and the County of San Mateo participated in the Regional Work Group meeting which was held in August 2023 and focused primarily on reviewing the Water Board's comments on the final Framework and Guidance Manual. Updates were also provided during the meeting on the draft Statewide Policy for Cost Reporting and a meeting between the BAMSC Cost Reporting Team and STORMS Staff regarding the Statewide Framework integration with the Bay Area Framework.

In March 2024, the Permittees completed revisions to the framework based on Water Board comments and submitted a Revised Final Bay Area Cost Reporting Framework. On June 26, 2024, the Water Board

provided conditional approval for the Revised Final Framework and Guidance Manual. The condition of approval was that any future modifications to the Framework, either for better alignment with Permittee accounting practices or for consistency with the State Water Board's Municipal Stormwater Cost Policy, must be approved by the Regional Water Board Executive Officer.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees to comply with MRP requirements in Provision C.20 include the following:

- Conduct a Cost Reporting Training Workshop for San Mateo County Permittees on July 24, 2024.
- Support San Mateo County Permittees in beginning to develop their first annual fiscal analyses due with the FY 2024/25 Annual Reports by answering Permittee questions and conducting brief demonstrations of the methodology in appropriate forums.

SECTION 21

C.21 Asset Management

INTRODUCTION

Provision C.21 Asset Management is a new provision introduced with MRP 3.0. The objective of Provision C.21 is for each Permittee to develop and implement an Asset Management Plan to ensure the satisfactory condition of all hard assets constructed during this and previous Permit terms. Hard assets are defined in the Permit as structural controls that serve a water quality function (e.g., bioretention cells, pervious pavement systems, and full trash capture devices). Provision C.21.b.i. requires Permittees to develop an Asset Management Plan that includes asset category descriptions, an inventory of assets, an Asset Management O&M Plan for prioritizing and scheduling O&M activities, and recommendations for a reporting strategy. Provision C.21.c. requires Permittees to submit their Asset Management Plans with the 2025 Annual Reports and then to report on implementation efforts annually starting with the 2026 Annual Reports. In addition, Provision C.21.c. requires Permittees to jointly complete a Climate Change Adaptation Report to identify potential climate change-related threats to assets and appropriate adaptation strategies by September 2026.

In FY 2023/24, SMCWPPP collaborated with other MRP countywide programs through the BAMSC Asset Management Work Group and formed a countywide work group to assist SMCWPPP permittees. This section provides information on the countywide and collaborative efforts, including the products developed and next steps.

IMPLEMENTATION OF MRP PROVISIONS

Provision C.21.b Asset Management Plan Development

In FY 2023/24, SMCWPPP formed an Asset Management Work Group to help guide SMCWPPP Permittees in the development of asset management plans. The Work Group met twice during the FY and participants included representatives from SMCWPPP, One Shoreline, San Mateo County, and the Cities of Atherton, Half Moon Bay, Burlingame, East Palo Alto, Foster City, Hillsborough, Daly City, Menlo Park, and Redwood City. Countywide Program staff provided Permittees with a presentation on asset management background and requirements. The Work Group also discussed approaches to asset management and opportunities for regional consistency. To support Permittee development of asset management plans, the Program developed an Asset Management Plan Template Outline for which Work Group members reviewed and provided feedback. The Outline was further developed into a draft Asset Management Plan Template with a framework for creating local asset management programs.

SMCWPPP provided in-kind support to a BAMSC Asset Management Work Group that formed for permittees to collaborate, share resources, and discuss a consistent approach to evaluating the condition of stormwater quality-related assets. The BAMSC Work Group met twice in FY 2023/24. During FY 2023/24, BAMSC Work Group members reviewed and discussed a proposed general approach and criteria for evaluating condition of GI/LID types of assets. The BAMSC Work Group also received two presentations

on examples of local experiences and resources for assessing the condition of GI-related assets. Lotus Water presented on San Francisco Public Utilities Commission (SFPUC) GI documents/resources related to SFPUC's Asset O&M Plan (i.e., GI Maintenance Guidebook, GI Asset Management and Maintenance Planning, and the GI Maintenance Cost Model) and the City of San Jose provided highlights on their GI Maintenance Field Guide (i.e., maintenance standards and procedures, inspection standards and example field form). Information on discussions at the BAMSC Work Group was shared with the SMCWPPP Asset Management Work Group.

FUTURE ACTIONS

FY 2024/25 activities planned by SMCWPPP to assist San Mateo County Permittees comply with MRP requirements in Provision C.21 include the following:

- The SMCWPPP Asset Management Work Group will continue to meet to review and provide comments on the draft Asset Management Plan Template and provide assistance to Permittees with development of local asset management programs.
- SMCWPPP will continue to evaluate the role of the GI Tracking Tool in supporting Permittee asset management programs and begin updates to the Tracking Tool as needed.
- SMCWPPP will continue to participate in the BAMSC Work Group which will continue discussing approaches for assessing condition of assets (GI and trash) and discuss Asset Management reporting strategies (i.e., by permittee, countywide, or regionally).