

Municipal Regional Stormwater NPDES Permit (MRP 4) Reissuance Kick Off Meeting

October 30, 2025



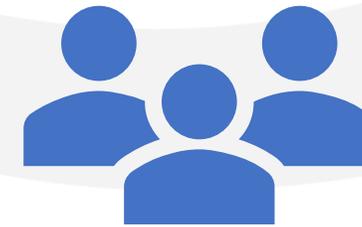
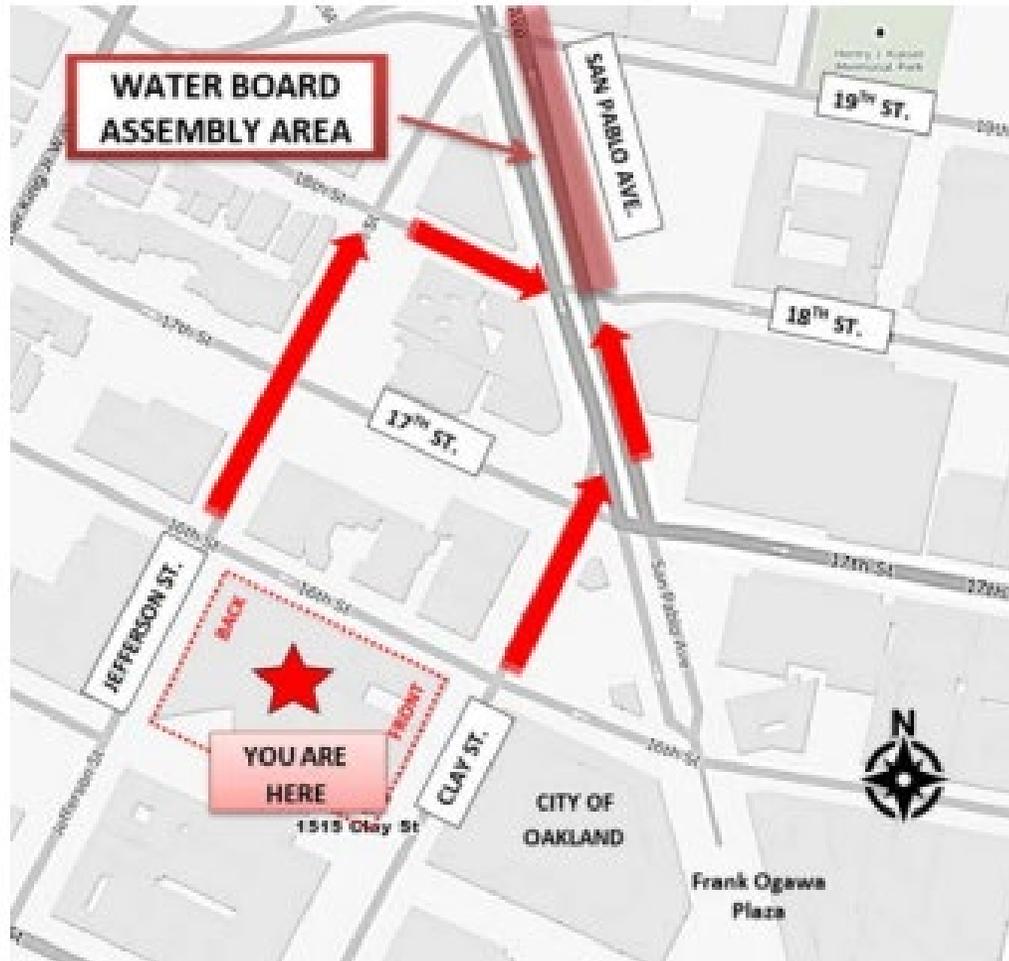
Meeting Overview

- Introductions & Agenda Review
- Objectives and Guiding Principles
- Timeline and Process
- High-Level Priorities
- Lunch
- Priorities Discussion
 - Priority Framework
 - Permittee & Water Board Priorities
- Closing and Next Steps



Full Building Evacuation

Go to San Pablo Ave between 18th St. and 19th St.



In-person logistics

Welcome and Introductions

- Welcome – Executive Officer
- Introductions – elected officials and director-level representatives
 - Name
 - Position/role
 - Who you are representing
- Stormwater staff – show of hands



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Reissuance: Permit 101

- The MRP: Clean Water Act Municipal Stormwater NPDES Permit
- 5-year permit term
 - 1990s: first (countywide) permits issued
 - 2009: MRP 1 issued
 - 2022: MRP 3 issued
 - 2027: MRP 4 (planned)
- The Permit
 - Prohibits non-stormwater discharges
 - Includes controls to reduce urban runoff pollutants to the maximum extent practicable
 - Includes water quality-based effluent limitations to address impairments
 - Includes other requirements (e.g., monitoring and reporting) to demonstrate compliance
- General approach: Improve over time to achieve water quality goals
- The MRP: Regional permit with 79 permittees

Reissuance: Objectives and Guiding Principles

- Collaborative stakeholder engagement
 - Substantive informal process that leads into formal reissuance process
 - Seek mutual understanding
 - Agree/disagree on purpose
- Evolutionary: build on lessons learned
 - Use MRP 3 work to inform MRP 4
 - Recognize significant changes early in reissuance process
- Equity & rules of the road
 - Clean Water Act requirements: a floor
 - Maximum extent practicable
 - Anti-backsliding
 - Flexibility: prioritization, schedules, intensity of action
 - A note on S.F. v. U.S. EPA: receiving water limits

BAY AREA MUNICIPAL STORMWATER COLLABORATIVE

MRP 4 Tenets (Guiding Principles)

MRP 4 Kickoff Meeting
October 30, 2025



BAMSC Tenets to Guide MRP 4 Reissuance Discussions

- Guiding principles for BAMSC representatives
- Agreed upon by MRP Permittees and associated Stormwater Programs
- Serve as points of reference and support productive discussions with Water Board staff
- 4 Categories
 - Streamlining and Simplification
 - Equity and Scalability
 - Clarity, Alignment, and Data-Driven Decisions
 - Transparency, Trust, and Collaboration

BAMSC Tenets to Guide MRP 4 Reissuance Discussions

1. Streamlining and Simplification

Objective: Focus on reducing complexity, administrative burden, and unnecessary provisions.

- **Minimize changes** to existing (MRP 3) provisions
- **No new provisions** in MRP 4 (unless absolutely necessary)
- **Eliminate duplicative and unimpactful requirements**
- **Reduce reporting frequency and scope** (e.g., EO approvals)
- **Minimize MRP 4 discussion meetings**

BAMSC Tenets to Guide MRP 4 Reissuance Discussions

2. Equity and Scalability

Objective: Ensure fairness across Permittees and adapt requirements to local capacity, geographic distinctions, and risk.

- **Include scalable requirements**
- **Provide equity**, especially for disadvantaged communities
- **Clarify applicability** for non-population-based Permittees (e.g., Flood Control Districts)
- **Reward or recognize early action and sustained compliance**

BAMSC Tenets

to Guide MRP 4 Reissuance Discussions

3. Clarity, Alignment, and Data-Driven Decisions

Objective: Promote clear language, consistency with broader mandates, and informed decision-making.

- **Use concise and clear permit language**, avoiding contradictions
- **Use available data** to inform scope/decisions; don't use the permit for R&D
- **Align terminology and goals** with climate resilience and “One Water”
- **Align permit requirements** with statewide mandates and practicable TMDL implementation
- **Ensure reporting requirements** are clearly stated, demonstrate effort and effectiveness, and aligned with annual reports

BAMSC Tenets

to Guide MRP 4 Reissuance Discussions

4. Transparency, Trust, and Collaboration

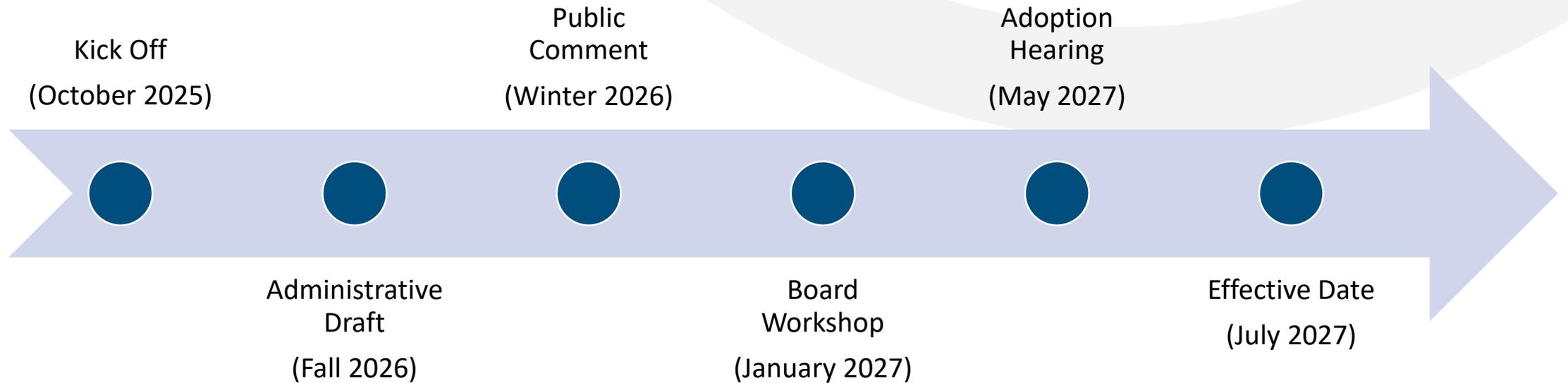
Objective: Encourage open communication and mutual respect among stakeholders.

- **Early identification** of substantive changes to permit requirements
- **Promote trust** through timely release of draft materials
- **Make space for discussions** at scheduled committee meetings to ensure inclusive dialogue



Reissuance Timeline and Process

Reissuance Timeline



Engagement Process



Early identification of significant changes

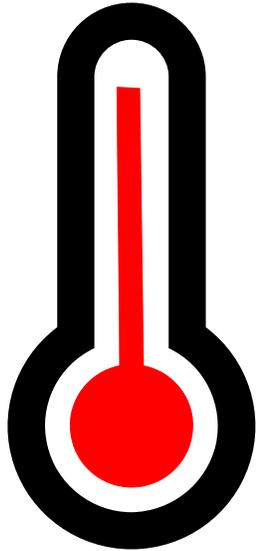


Workgroup discussions

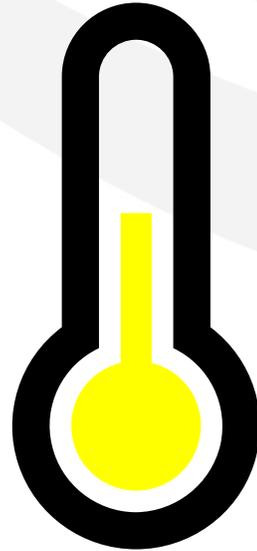


We want your engagement

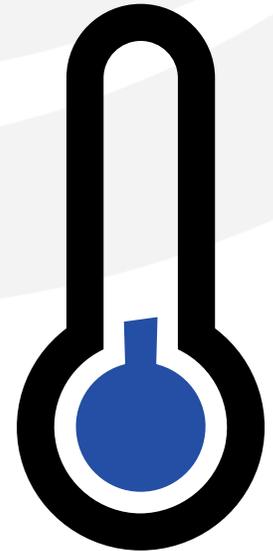
Priority Framework



High



Medium



Low

Water Board Priority Overview



High

- C.3 – New Development and Redevelopment
- C.10 – Trash Load Reduction
- C.12 – Polychlorinated Biphenyls (PCBs) Controls
- New Provision – Lake Merced

Additional priorities:

- Communication & Engagement Process
- Community Outreach



Medium

- C.1 – Compliance with Discharge Prohibitions and Receiving Water Limitations
- C.5 – Illicit Discharge Detection and Elimination
- C.8 – Water Quality Monitoring
- C.11 – Mercury Controls
- C.14 – Bacteria Control for Impaired Water Bodies
- C.15 – Exempted and Conditionally Exempted Discharges
- C.17 – Discharges Associated with Unsheltered Homeless Populations
- C.20 – Cost Reporting
- C.21 – Asset Management



Low

- A – Discharge Prohibitions
- C.2 – Municipal Operations
- C.4 – Industrial and Commercial Site Controls
- C.6 – Construction Site Controls
- C.7 – Public Information and Outreach
- C.9 – Pesticides Toxicity Control
- C.13 – Copper Controls
- C.16 – Discharge to Areas of Special Biological Significance
- C.18 – Control of Sediment Discharges from Coastal San Mateo Roads
- C.22 – Annual Reports
- C.23 – Modifications to this Order
- C.24 – Standards Provisions
- C.25 – Expiration Date
- C.26 – Rescission of Old Order
- C.27 – Effective Date

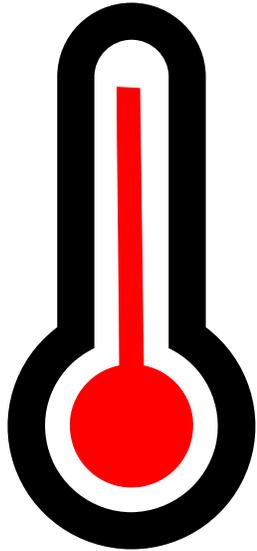
Permittee Priorities and Interests



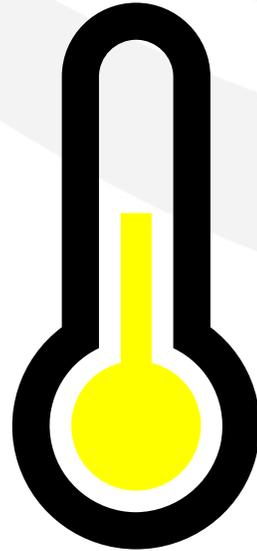


Lunch Break – Be back at 1:00 PM

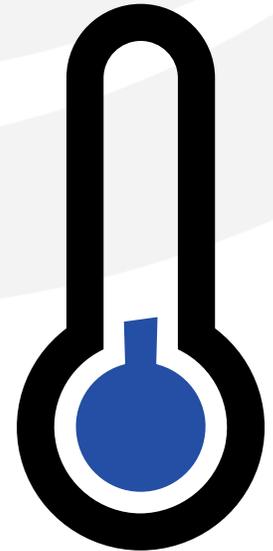
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Medium



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Permittee Priorities and Interests



Water Board Priority Overview



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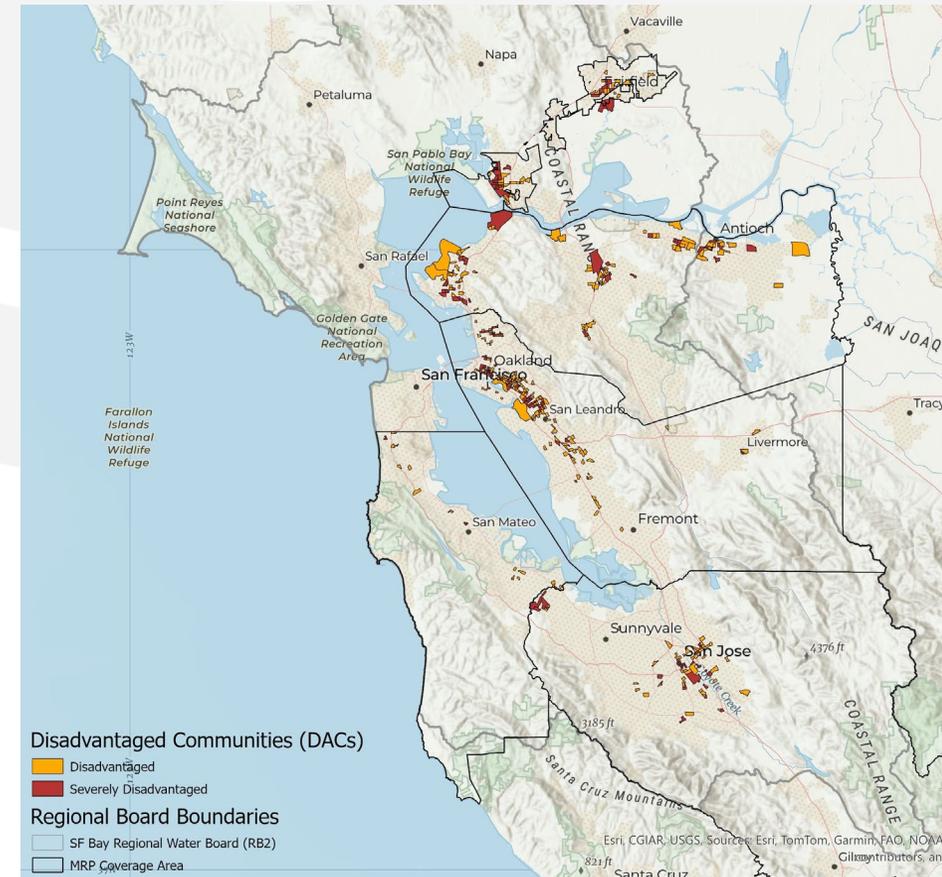
- A – Discharge Prohibitions
- C.2 – Municipal Operations
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Communication & Engagement

- Collaborative stakeholder engagement
- Workgroup meetings for priority provisions
 - In-person, virtual, and/or hybrid
 - Establish process for when there is disagreement
- Administrative draft to reflect engagement outcomes
- Board workshop
 - Opportunity for you to engage with the Board
 - Also allows non-permittee stakeholders to engage
- What will make the process meaningful for you?

Community Outreach

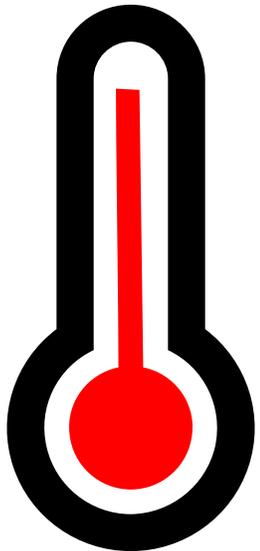
- Approach
 - Work with Permittees to identify communities and develop engagement plan
 - Water Board preliminary identification based on:
 - Permittee input
 - Known DACs, linguistic isolation, and exposure (CalEnviroScreen)
 - Tribal and community organization contacts
 - Organizations currently providing input
 - Beneficial Use-focused
- Required (AB 2108) for Water Boards permits



Provision C.3 – New Development and Redevelopment

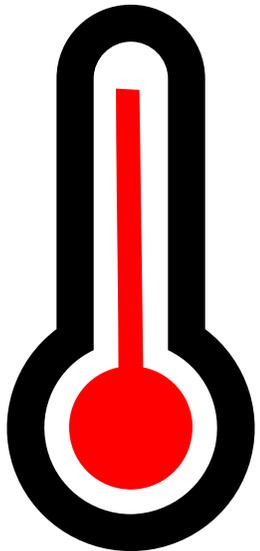
- Significant changes for new C.3.j. GSI provision framework
 - Added flexibility and promote multi-benefit projects
- Largely maintain existing requirements for C.3.a. through C.3.i.
- Reorganize and streamline, remove duplicative language
- Minor tweaks to clarify ambiguous or vague language
- Minor updates to reporting requirements

- Lead staff: TBD (Interim: Aidan Cecchetti, Aidan.Cecchetti@waterboards.ca.gov; 510-620-3457)



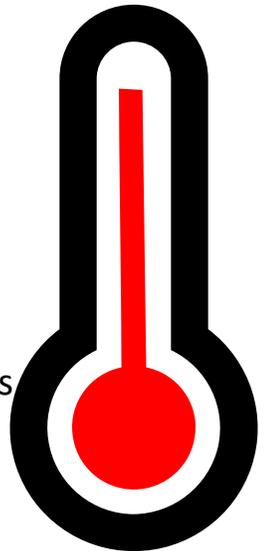
Provision C.10 – Trash Control

- Shift from achieving to maintaining 100% trash control
- Focus on operation and maintenance requirements
- Establish criteria for bioretention as full trash capture equivalent
- Lead staff: Imtiaz-Ali (Ali) Kalyan (510-622-22499; imtiaz-ali.kalyan@waterboards.ca.gov)



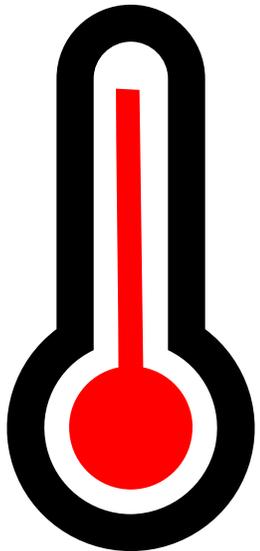
Provision C.12 – Polychlorinated Biphenyls (PCBs) Controls

- Three Implementation Tiers
 - I. Implementation requirements for all or almost all Permittees (demolition debris, risk reduction)
 - Considering language to encourage Permittees with responsibilities only in this tier to support Permittees with more PCBs challenges
 - II. Implementation requirements for Permittees with more-contaminated areas
 - Continue and expand the old industrial area control measure program
 - III. Planning requirements for Permittees with watersheds draining to high-priority margin areas: Plan for future implementation
 - Enhanced accountability related to watershed-specific load reduction requirements for MRP 5 and beyond
 - 2030 PCBs TMDL revision will have this as a new implementation feature
- Set new targets (mass reductions) for:
 - Source property investigation and abatement [finish by end of MRP 4]
 - Control measures implementation in old industrial areas [continue from MRP 3 and expand]
- Early MRP 4 work to plan Tier III activities to support TMDL review
- Update accounting system for PCBs load reduction estimation
 - Consider new data for all methods and find ways to refine land use-based yield approach using newer data and models
 - Revisit approach applied to redevelopment (difference in yields)
- Lead staff: Ashraf Ali (Ashraf.Ali@waterboards.ca.gov; 510-622-2335)



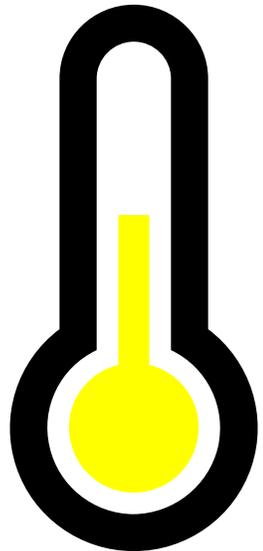
New Provision – Lake Merced

- New provision to cover stormwater discharges from Vista Grande Canal into Lake Merced by the City of Daly City and County of San Mateo
- Require BMP implementation and operation to control dissolved oxygen, nutrients, and pH
- Monitoring and reporting according to the City and County Lake Management Plan
- Lead staff: Joseph Monical (Joseph.Monical@Waterboards.ca.gov; 510-622-2387)



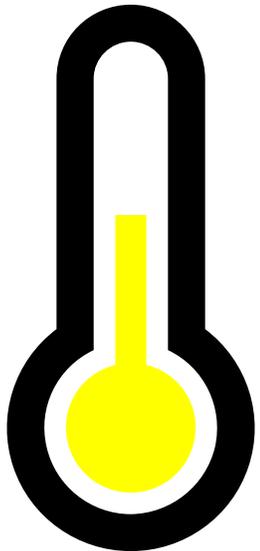
Provision C.1 – Compliance with Discharge Prohibitions and Receiving Water Limitations

- No changes in requirements
- Update language to reflect:
 - Inapplicability of the *City and County of San Francisco v. U.S. EPA*
 - State Board precedential decisions that govern inclusion of receiving water limitations in MS4 permits
- Lead staff: Rebecca Nordenholt
(Rebecca.Nordenholt@waterboards.ca.gov; 510-622-1013)



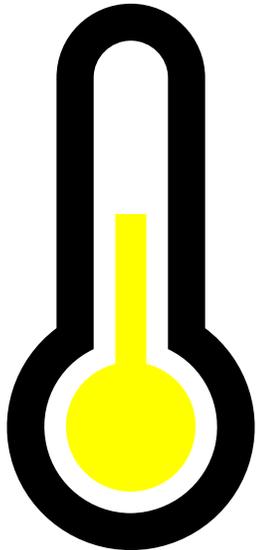
Provision C.5 – Illicit Discharge Detection and Elimination

- Update and submit MS4 maps to incorporate current storm sewer system status and modifications, based on plan and schedule submitted with 2026 Annual Report (C.5.f)
- Include food vendors in categories of mobile businesses (C.5.e)
- Lead staff: Joseph Monical (Joseph.Monical@Waterboards.ca.gov; 510-622-2387)



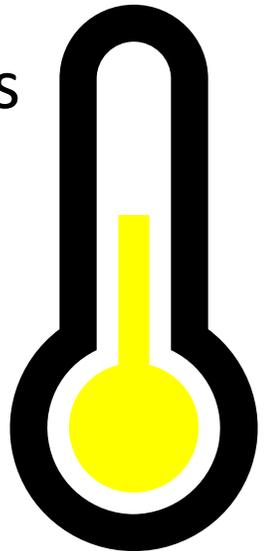
Provision C.8 – Water Quality Monitoring

- Streamline monitoring methods and reporting for Pollutants of Concern (POC) monitoring (C.8.f)
- Update monitoring to incorporate lessons learned
- Lead staff: Ashraf Ali (Ashraf.Ali@waterboards.ca.gov; 510-622-2335)



Provision C.11 – Mercury Controls

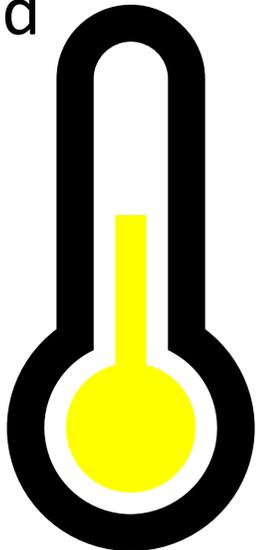
- Much of C.11 will look somewhat similar to C.12
- Possible mercury-specific provision assessing whether allocations have been achieved in some program areas
 - Maybe in C.8 instead
- Continued approach to let PCBs contamination “drive” most decisions about siting of control measures and investigatory efforts
- Lead staff: Ashraf Ali (Ashraf.Ali@waterboards.ca.gov; 510-622-2335)



Provision C.14 – Bacteria Control for Impaired Water Bodies

- C.14.a – Update requirements based on submittals
- C.14.b – Continue implementation
- C.14.c – Update requirements based on submittals
- Add new sub-provision for the San Francisco Bay Beaches Advanced Restoration Plan

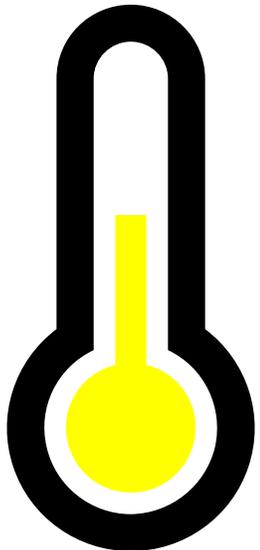
- Lead staff: TBD (Joseph interim
Joseph.Martinez@waterboards.ca.gov; 610-622-2304)



Provision C.15 – Exempted and Conditionally Exempted Discharges

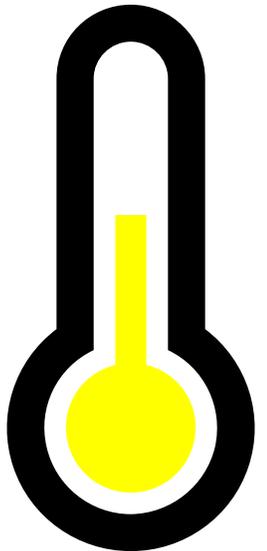
- Maintain existing requirements for most categories of discharges
- Update C.15.b.iii. (emergency firefighting discharges) based on working group outcomes
- Make minor language updates for concision and clarity
- Consider new low threat discharge categories

- Lead staff: TBD (Aidan Cecchetti interim
Aidan.Cecchetti@waterboards.ca.gov; 510-620-3457)



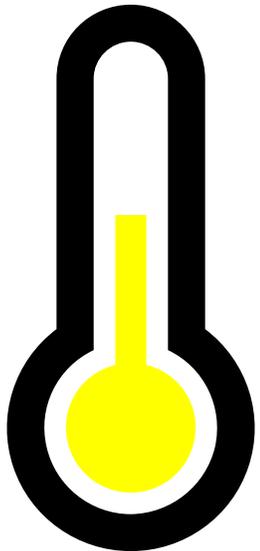
Provision C.17 – Discharges Associated with Unsheltered Homeless Populations

- Maintain provision
- Update language based on lessons learned
 - Update BMP report and collaboration
 - Consider status and trends on unsheltered populations
 - Continue to update maps - unsheltered homeless populations relative to storm drain inlets and receiving waters
- Next steps on engagement?
- Lead staff: Imtiaz-Ali (Ali) Kalyan (510-622-22499; imtiaz-ali.kalyan@waterboards.ca.gov)



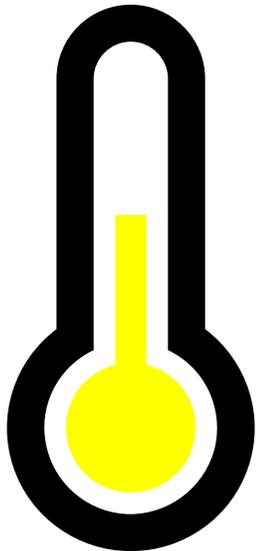
Provision C.19 – East County Permittees

- Update in coordination with Region 5 to reflect TMDL needs
- Ensure methylmercury monitoring requirements answer management questions – updates may be needed
- Lead staff: Ashraf Ali (Ashraf.Ali@waterboards.ca.gov; 510-622-2335)



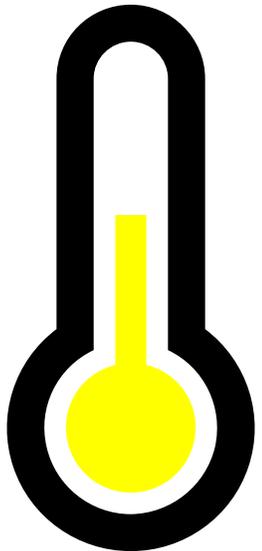
Provision C.20 – Cost Reporting

- Update to incorporate State Water Board's 2025 Policy for the Standardization of Cost Reporting and experience with implementation during current permit term
- Lead staff: Joseph Monical (Joseph.Monical@Waterboards.ca.gov; 510-622-2387)



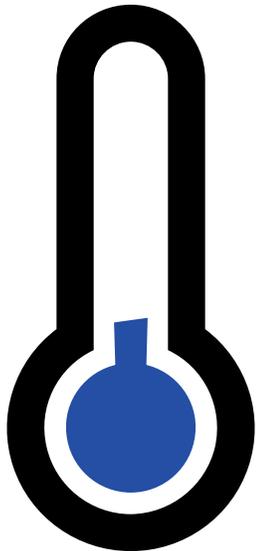
Provision C.21 – Asset Management

- Maintain existing requirements with minor updates for concision and clarity
- Consider updates based on lessons learned following review of Asset Management Plans
- Lead staff: TBD (Aidan Cecchetti interim
Aidan.Cecchetti@waterboards.ca.gov; 510-620-3457)



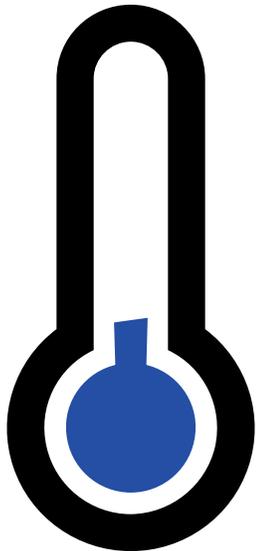
Low Priority Provisions

- A – Discharge Prohibitions
- C.2 – Municipal Operations
- C.4 – Industrial and Commercial Site Controls
- C.6 – Construction Site Controls
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Low Priority Provisions (continued)

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Closing and Next Steps



Meeting outcomes



Action items



Future engagement