

# C/CAG

## CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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June 4, 2026

The Honorable Sean Duffy  
Secretary  
U.S. Department of Transportation  
1200 New Jersey Avenue, S.E.  
Washington D.C. 20590

### **Re: FY 2025-2026 Railroad Crossing Elimination (Crossing Safety) Program, Caltrain – Burlingame Broadway Grade Separation Project**

Dear Secretary Duffy,

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), I am writing to express support for Caltrain's FY25-26 Railroad Crossing Elimination (Crossing Safety) Program grant application for the Burlingame Broadway Grade Separation Project (Project). This grade separation project advances the program's goals by improving rail safety, strengthening community health and safety, and enhancing the mobility of people and goods through a heavily-traveled corridor.

C/CAG is the County Transportation Agency (CTA) and also the designated Congestion Management Agency (CMA) for San Mateo County. C/CAG represents all of San Mateo County's 764,442 residents through its 21-member Board of Directors that includes a seat for every jurisdiction in San Mateo County. C/CAG works to improve climate resiliency, mobility, the environment, and equity, as well as prioritizing safety throughout San Mateo County. This project aligns with all of C/CAG's goals.

With over 10,000 at-grade railroad crossings throughout the State of California, the Broadway at-grade railroad crossing in Burlingame remains the number one priority on the California Public Utilities Commission's Grade Separation Priority List. Addressing this crossing is essential to protect people driving along the corridor each day and to reduce risks created by the interaction of frequent rail service and heavy roadway traffic.

With the support of the U.S. Department of Transportation, this new critical infrastructure will improve public safety at a dangerous crossing, support American families, and invigorate the economic vitality of the region.

For these reasons, C/CAG strongly supports this application and encourages you to provide full funding for this critical initiative. If you have any questions, please contact me at: [kcheung1@smcgov.org](mailto:kcheung1@smcgov.org).

Sincerely,



Kaki Cheung  
Acting Executive Director



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May 21, 2026

The Honorable Dave Cortese  
Chair, Senate Transportation Committee  
Swing Space, Suite 7520  
Sacramento, CA 95814

**RE: AB 2595 (Papan) San Mateo County Age Limit for Electric Bicycle Use – SUPPORT**

Dear Chair Cortese:

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), I write in **SUPPORT** of bill AB 2595 (Papan), which will establish the San Mateo Electric Bicycle Safety Pilot Program and permit San Mateo County and the cities within it to adopt local ordinances or resolutions prohibiting a person under 12 years of age from operating a class 1 or 2 electric bicycle.

If successfully enacted, AB 2595 would give our local jurisdictions the ability to work through their local processes to potentially implement local rules prohibiting the use of Class I and II e-bikes if certain conditions are met. This bill does not establish a mandate that cities implement this rule and mirrors existing laws in San Diego and Marin Counties.

San Mateo has seen a rise in e-bikes on our streets, roads, and trails, many of them operated by youth who do not yet have a common understanding of the rules of the road, the power the bikes possess, or the ability to adequately control heavier Class II e-bikes. We have seen a rise in recent e-bike accidents, including the death of a minor in the City of Half Moon Bay earlier this year. These incidents not only injure the rider, but often other pedestrians are put in danger.

It is imperative that the Legislature give local agencies the tools to ensure e-bikes are safely operated in our communities and by riders who can safely operate them. Age restrictions for e-bikes can be a successful tool for local agencies to educate parents and children alike on the laws governing e-bikes and deter parents from purchasing e-bikes for younger riders who cannot operate them in a safe manner.

For these reasons, we support AB 2595 (Papan) and urge your "AYE" vote when it is heard in your committee. Please contact Sean Charpentier, C/CAG Executive Director, at [scharpentier@smcgov.org](mailto:scharpentier@smcgov.org) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Michael Salazar". The signature is written in a cursive style with a large, prominent initial "M".

Michael Salazar, Chair  
City/County Association of Governments of San Mateo County

CC: Assembly Member Diane Papan  
Members and Consultants, Senate Transportation Committee



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May 26, 2026

The Honorable Marc Berman  
California State Assembly  
1021 O Street, Suite 8130  
Sacramento, CA 95814

**RE: AB 2313 (Berman) The Home Energy Choice Act – SUPPORT**

Dear Assemblymember Berman:

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), I write to express our **SUPPORT** for **AB 2313 (Berman)**, which will create the Home Energy Choice Act, giving Californians a new opportunity to upgrade their homes with modern electric appliances.

Electrification is one of the primary strategies for California to achieve its clean energy and greenhouse gas (GHG) reduction goals, but home electrification can be expensive, and many Californians may struggle to afford the upfront costs of replacing gas appliances or completing related electrical upgrades. The status quo, however, is also costly, with California utilities spending hundreds of millions of dollars annually to maintain aging gas infrastructure, costs that are ultimately borne by ratepayers.

The Home Energy Choice Act would provide a pathway for utilities to redirect funds for planned service line replacements towards homeowner building electrification incentive programs. By supporting strategic electrification and reducing reliance on aging gas infrastructure, AB 2313 can help protect the environment, promote public health, and provide long-term savings for all ratepayers.

For these reasons, we are proud to **SUPPORT** AB 2313 (Berman). For any questions please contact Kaki Cheung, C/CAG Acting Executive Director, at [kcheung1@smcgov.org](mailto:kcheung1@smcgov.org).

Sincerely,

A handwritten signature in black ink that reads "Michael Salazar". The signature is written in a cursive, flowing style.

Michael Salazar, Chair  
City/County Association of Governments of San Mateo County

Submitted via email: [Selina.Louie@waterboards.ca.gov](mailto:Selina.Louie@waterboards.ca.gov)

April 24, 2026

Selina Louie  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

**Re: Comment Letter – Tentative Resolution and Draft Advance Restoration Plan for Indicator Bacteria Impairment at San Mateo County Beaches**

Dear Ms. Louie:

This letter is submitted on behalf of the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) regarding the Tentative Resolution and Draft Staff Report describing the Advance Restoration Plan (ARP) to achieve water quality objectives for indicator bacteria at San Mateo County beaches. SMCWPPP is a program of the City/County Association of Governments (C/CAG) of San Mateo County. Each incorporated city and town in the county and the County of San Mateo share a common National Pollutant Discharge Elimination System (NPDES) permit to discharge municipal stormwater to receiving water bodies in the San Francisco Bay Area (Order No. R2-2022-0018, referred to as the “MRP”).

SMCWPPP coordinates implementation of MRP requirements but is not the regulatory entity responsible for compliance. We understand that the Tentative Resolution supports, but does not itself impose, new regulatory requirements, and that implementation of the ARP will occur through existing regulatory mechanisms and authorities. Implementation of actions identified in the ARP would occur at the individual permittee level and through multiple regulatory programs.

SMCWPPP appreciates the opportunity to submit comments on the Tentative Resolution and Draft Advance Restoration Plan.

**OVERALL SUPPORT FOR THE ARP APPROACH**

SMCWPPP supports the Regional Water Board’s use of an ARP to address bacteria impairments. The ARP provides a more flexible and adaptive approach than development of a Total Maximum Daily Load (TMDL), reflecting the evolving science related to bacteria sources, transport, and risk. We support the focus on identifying and addressing higher-risk sources, including human waste sources identified through microbial source tracking and special studies. An adaptive framework is appropriate given ongoing scientific and regulatory developments related to bacteria objectives, source characterization, and risk-based approaches, which may inform future refinements to how bacteria impairments are assessed and addressed.

**COMMENT 1 – CONSIDERATION OF WET WEATHER AND DIFFUSE SOURCES**

The Draft Staff Report identifies a broad range of bacteria sources, including human and non-human sources such as sanitary systems, pet waste, wildlife, biofilms, and stormwater runoff. In urban watersheds, wet weather conditions mobilize bacteria from diffuse sources, including wildlife and environmental reservoirs such as in-stream sediments, beach sands/muds, and stormwater conveyance systems. These reservoirs can retain bacteria and under certain conditions, support their persistence or regrowth, allowing them to be released to receiving waters even in the absence of a recent fecal input.

The ARP does not clearly distinguish between dry weather and wet weather conditions in evaluating attainment of water quality objectives (WQOs). As a result, exceedances driven by storm-related mobilization of diffuse and largely uncontrollable sources may limit the ability to demonstrate progress, even where appropriate actions are implemented. An evaluation framework that accounts for these dynamics would improve the ability to assess progress.

Recommendation: We recommend that the ARP incorporate an evaluation framework that accounts for these dynamics, such as:

- Distinguishing between dry weather and wet weather implementation and assessment, and/or
- Considering background or non-controllable sources when interpreting monitoring results.

This approach would better reflect the scientific understanding of bacteria fate and transport and support a more meaningful evaluation of progress.

## **COMMENT 2 – ADAPTIVE MILESTONES AND THE 10-YEAR IMPLEMENTATION HORIZON**

The ARP includes near-term and longer-term evaluation points (e.g., 5- and 10-year check-ins). The Tentative Resolution indicates that if WQOs are not attained within 10 years, the Regional Water Board will consider development of a TMDL.

Given the complexity of bacteria sources, the number of responsible entities, and the need for inter-agency coordination, it is important that the ARP include a clear adaptive management framework that allows sufficient time to evaluate the effectiveness of implemented actions. Assessment of trends in bacteria concentrations typically requires many years of data. Variability associated with hydrology, episodic sources, and diffuse sources may limit the ability to detect meaningful changes within early evaluation periods.

Consideration of a TMDL should therefore be informed not only by whether WQOs have been attained within a fixed timeframe, but also by the extent to which planned actions have been implemented and whether available data demonstrate progress or improving trends. Where implementation is ongoing and data are insufficient to evaluate trends, additional time for implementation and monitoring may be warranted prior to consideration of a TMDL.

The ARP includes annual reporting and periodic review of implementation progress. While regular tracking is appropriate, evaluation of water quality trends and program effectiveness may be more meaningful at a multi-year scale. We recommend that reporting and review be structured to support adaptive management while focusing detailed evaluation on timeframes sufficient to assess trends and outcomes.

Recommendation: We recommend that the ARP clarify that decisions regarding progression to a TMDL will be based on a weight of evidence, including implementation progress and evaluation of water quality trends, rather than solely on attainment of WQOs within a fixed timeframe. Specifically, we recommend that:

- Interim evaluations prioritize assessment of implementation progress and supporting indicators;
- Evaluation of water quality trends be based on multi-year datasets sufficient to detect meaningful changes; and
- Where implementation is ongoing and data are insufficient to evaluate trends, additional time for implementation and monitoring be provided prior to initiating a TMDL.

## **COMMENT 3 – EVALUATION OF PROGRESS TOWARD BENEFICIAL USE PROTECTION**

The ARP relies on compliance with existing WQOs for enterococcus to evaluate attainment of recreational beneficial uses. While these objectives are intended to protect human health, their application in highly urbanized systems influenced by mixed human and non-human sources can present limitations. Enterococcus does not distinguish between sources, and exceedances may be driven by wildlife or other environmental sources (e.g., biofilms) that are largely outside the control of stormwater programs, potentially obscuring the effectiveness of implemented actions.

SMCWPPP supports the ARP's use of microbial source tracking (MST) and other tools to better characterize bacteria sources and inform prioritization of higher-risk sources. However, because MST is used to inform implementation rather than to evaluate compliance, its benefits are not fully reflected in how progress is assessed under the ARP.

SMCWPPP recommends that the ARP consider multiple lines of evidence when evaluating progress, including implementation of control measures, trends in receiving water quality, and results from MST or other tools that distinguish between sources. An evaluation approach that distinguishes between controllable and less controllable sources would provide a more accurate assessment of whether implemented actions are effectively reducing risk to recreators.

While the ARP appropriately incorporates MST and other tools to inform source identification, it does not clearly define how source information will be used to evaluate progress or support conclusions regarding controllable versus non-controllable sources. In practice, demonstrating the relative contribution of wildlife or other environmental sources can be challenging, and reliance on a single line of evidence (e.g., absence of human markers) may not be sufficient. Clearer guidance on acceptable approaches for interpreting source information would improve consistency and transparency in evaluating progress.

Recommendation: We recommend that the ARP incorporate a multiple-lines-of-evidence approach for evaluating progress toward beneficial use protection, rather than relying solely on attainment of enterococcus WQOs. Specifically, we recommend that:

- Evaluation of progress include consideration of implementation status and effectiveness of source control measures;
- Monitoring results be interpreted in the context of source information (e.g., MST) to distinguish between human and non-human contributions; and
- The ARP identify acceptable approaches for demonstrating the influence of non-controllable or background sources, using multiple lines of evidence (e.g., MST, spatial/temporal patterns, hydrologic conditions, and supporting studies); and
- The ARP clarify how these lines of evidence will be used to assess progress and inform adaptive management decisions.

#### **COMMENT 4 – PRIORITIZATION OF IMPLEMENTATION ACTIONS BASED ON SOURCE CONTRIBUTION AND RISK**

The ARP identifies a broad range of potential bacteria sources and corresponding implementation actions. However, the relative contribution of these sources and their associated risk to recreational beneficial uses may vary across locations and conditions.

Given the variability in source contributions, it is important that implementation efforts be prioritized in a manner that reflects both the likelihood that a given source is contributing to WQO exceedances and the potential risk to beneficial uses. Without such prioritization, there is a potential for resources to be directed toward actions that may have limited influence on water quality outcomes or public health risk.

Recommendation: We recommend that the ARP clarify that implementation actions will be prioritized and evaluated based on the relative contribution of sources and their associated risk to recreational beneficial uses. Specifically, we recommend that:

- Implementation efforts focus on sources with a demonstrated or reasonably inferred contribution to exceedances;
- Source prioritization incorporate available data, including MST data, spatial and temporal patterns, and site-specific conditions; and
- The ARP provide flexibility to adjust priorities over time as additional information becomes available through monitoring and special studies.

#### **COMMENT 5 – FEASIBILITY AND INTERAGENCY COORDINATION**

Some implementation measures identified in the ARP, particularly those related to complex social or infrastructure issues, will require coordination with agencies beyond stormwater programs and may be constrained by jurisdictional authority and available resources.

Recommendation: We recommend that the ARP acknowledge these constraints and emphasize coordinated, multi-agency implementation approaches, rather than implying that any single program is responsible for achieving all outcomes. Additionally, implementation responsibility should align with the best available evidence regarding source contributions, particularly where data are limited or sources are uncertain.

## **CLOSING**

SMCWPPP appreciates the Regional Water Board's efforts to develop a practical and science-informed approach to addressing bacteria impairments. We support the use of an ARP as a flexible framework that can be refined over time as additional information becomes available.

We believe the recommendations above would improve the clarity, feasibility, and effectiveness of the ARP while maintaining progress toward protecting recreational beneficial uses.

Additionally, SMCWPPP supports the comments from the California Stormwater Quality Association.

Thank you for the opportunity to comment on the San Mateo County Beaches ARP. Please contact me at [rbogert@smcgov.org](mailto:rbogert@smcgov.org) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Reid Bogert". The signature is written in a cursive style with a large initial "R" and "B".

Reid Bogert  
Program Director  
San Mateo Countywide Water Pollution Prevention Program