

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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STORMWATER COMMITTEE AGENDA

Date: Thursday, August 20, 2026	Join by Zoom Webinar: https://us02web.zoom.us/j/82382851421?pwd=TLhmVaAdCvLDpMwNa3w1w3OTTr3Y7b.1
Time: 2:30 p.m.	Zoom Webinar ID: 823 8285 1421
Location: City of Belmont Emergency Operations Center Belmont City Hall, 2 nd Floor One Twin Pines Lane, Belmont, CA 94002	Password: 696962 Join by Phone: (669) 900-6833

*** IN-PERSON MEETING WITH REMOTE PUBLIC PARTICIPATION AVAILABLE ***

This meeting of the C/CAG Stormwater Committee will be held in person at the location listed above. Members of the public will be able to participate in the meeting remotely via the Zoom platform or in person at the location above. The Committee welcomes comments, including criticism, about the policies, procedures, programs, or services of the agency, or of the acts or omissions of the Board and committees. Speakers shall not disrupt, disturb, or otherwise impede the orderly conduct of a Committee or Board meeting. For information regarding how to participate in the meeting, either in person or remotely, please refer to the instructions at the end of the agenda.

1. Call to Order	Ovadia/ Bogert	No materials
2. Public comment on items not on the Agenda (presentations limited to three minutes).	Ovadia	No materials
3. Review and approve the April 16, 2026 Stormwater Committee meeting minutes. (Action)	Ovadia	Pages 1-5
4. Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Climate Change Adaptation Report at the August 27 BAMSC Steering Committee. (Action)	Bogert	Page 6-7
5. Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Effectiveness Evaluation of the Protocols for Managing PCBs-containing Materials During Building Demolition Project Report at the August 27 BAMSC Steering Committee. (Action)	Bogert	Pages 8-10
6. Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Source Load Reduction	Bogert	Pages 11-12

Accounting for Reasonable Assurance Analysis 2026 Update at the
August 27 BAMSC Steering Committee. (Action)

7. Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Supplement for New and Redevelopment at the August 27 BAMSC Steering Committee. (Action)	Bogert	Pages 13-14
8. Receive information and guidance on the Municipal Regional Stormwater Permit Provision C.21 Asset Management requirements regarding asset condition assessment. (Information)	Bogert/ Sinclair	Pages 15-16
9. Receive information on the reissuance of the Municipal Regional Stormwater Permit. (Information)	Sternkopf	Pages 17-19
10. Receive stormwater program related information and announcements. (Information)	Bogert/ Sternkopf	Pages 20-31
11. Regional Board Report	Regional Water Board Staff	No materials
12. Executive Director's Report	Cheung	No materials
13. Member Reports	All	No materials
14. Adjourn	Ovadia	No materials

The next regularly scheduled meeting is on September 17, 2026.

Future potential topics:

- FY 2025-26 SMCWPPP Annual Report recommendation for approval and submittal to Regional Water Board.
- Presentation from OneShoreline on proposed transition of collection and administration of NPDES property fees generated by Flood Zone 1 to OneShoreline.

PUBLIC NOTICING: All notices of C/CAG regular Board meetings, standing committee meetings, and special meetings will be posted at the San Mateo County Court Yard, 555 County Center, Redwood City, CA, and on C/CAG's website at: <http://www.ccag.ca.gov>.

PUBLIC RECORDS: Public records that relate to any item on the open session agenda for a regular Stormwater Committee meeting, standing committee meeting, or special meeting are available for public inspection. Those public records that are distributed less than 72 hours prior to a regular Stormwater Committee meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members, of the Stormwater Committee. The Stormwater Committee has designated the office of the City/County Association of Governments of San Mateo County (C/CAG), located at 555 County Center, 5th Floor, Redwood City, CA 94063, for the purpose of making public records available for inspection. Such public records are also available on C/CAG's

website at: <http://www.ccag.ca.gov>. Please note that C/CAG's office is temporarily closed to the public; please contact Reid Bogert at (650) 363-4105 to arrange for inspection of public records.

PUBLIC PARTICIPATION DURING VIDEOCONFERENCE MEETINGS: Persons with disabilities who require auxiliary aids or services to participate in this meeting should contact Reid Bogert at 650-382-4496, five working days prior to the meeting date.

ADA REQUESTS: Persons with disabilities who require auxiliary aids or services to participate in this meeting should contact Reid Bogert at 650-382-4496 or rbogert@smcgov.org by 10:00 a.m. on the day prior to the meeting date.

PUBLIC PARTICIPATION: Members of the public may address the Committee as follows:

Written comments should be emailed in advance of the meeting. Please read the following instructions carefully:

1. Your written comment should be emailed to rbogert@smcgov.org.
2. Your email should include the specific agenda item on which you are commenting or note that your comment concerns an item that is not on the agenda.
3. Members of the public are limited to one comment per agenda item.
4. The length of the emailed comment should be commensurate with the two minutes customarily allowed for verbal comments, which is approximately 250-300 words.
5. If your emailed comment is received at least 2 hours prior to the meeting, it will be provided to the C/CAG Stormwater Committee members and made publicly available on the C/CAG website along with the agenda. We cannot guarantee that emails received less than 2 hours before the meeting will be made publicly available on the C/CAG website prior to the meeting, but such emails will be included in the administrative record of the meeting.

Spoken comments will be accepted during the meeting in person and through Zoom. Public comments will be taken first by speakers in person, followed by via Zoom. Please read the following instructions carefully:

***In-person participation:**

1. If you wish to speak to the C/CAG Stormwater Committee, please fill out a speaker's slip located on the 2nd floor auditorium side table against the wall. If you have anything that you wish to distribute to the Committee and included in the official record, please hand it to the C/CAG staff who will distribute the information to the Committee members and staff.

***Remote participation:**

Spoken comments will be accepted during the meeting through Zoom. Please read the following instructions carefully:

1. The C/CAG Stormwater Committee meeting may be accessed through Zoom at the online location indicated at the top of this agenda.
2. You may download the Zoom client or connect to the meeting using an internet browser. If using your browser, make sure you are using a current, up-to-date browser. Certain functionality may be disabled in older browsers including Internet Explorer.
3. You will be asked to enter an email address and name. We request that you identify yourself by your name as this will be visible online and will be used to notify you that it is your turn to speak.
 1. When C/CAG Staff or Chair/Vice Chair call for the item on which you wish to speak, click on "raise hand." Staff will activate and unmute speakers in turn. Speakers will be notified shortly before they are called on to speak. If calling in via phone, press *9 to raise your hand and when called upon press *6 to unmute.
4. When called, please limit your remarks to the time allotted.

If you have any questions about this agenda, please contact C/CAG staff: Reid Bogert at rbogert@smcgov.org.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Review and approve the April 16, 2026 Stormwater Committee meeting minutes.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) review and approve the April 16, 2026 Stormwater Committee meeting minutes.

BACKGROUND/DISCUSSION

N/A.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. Draft April 16, 2026 Stormwater Committee meeting minutes.

Stormwater Committee

Thursday April 16, 2026

2:30 p.m.

Draft Meeting Minutes

The Stormwater Committee meeting was held in a hybrid format (i.e., in person and videoconference) pursuant to Government Code Section 54953(e). Committee members met in-person at the offices of the San Mateo County Transit District in the City of San Carlos. Municipal staff (not part of a legislative body of C/CAG) and members of the public could participate remotely via the Zoom platform or in-person at the location above. Attendance at the meeting is shown in the attached table. In addition to the Committee members, also in attendance were Reid Bogert (C/CAG staff), Dan Sternkopf (C/CAG Staff), Sean Charpentier (C/CAG Executive Director), Sarah Deicke (County of San Mateo), Matt Lee (City of San Carlos), Angelica Ali (City of San Bruno), Bonnie de Berry (EOA Inc.), Kirstin Kerr (EOA Inc.), Stephanie Lau (OneShoreline), Ashraf Ali (Regional Water Board), Mel Johnson (Regional Water Board), Chris Sommers (EOA Inc.), and Karen Cowen (CASQA Executive Director). Chair Ovadia called the meeting to order at 2:42 p.m.

1. Call to Order, Roll Call, and a brief overview of meeting procedures.
2. Public comment on items not on the agenda – No comments were received from the public.
3. PRESENTATION – The Committee received a presentation on annual updates from Karen Cowen, the Executive Director of the California Stormwater Quality Association (CASQA). Cowen provided an overview of CASQA's ongoing work and the benefits to CASQA members. CASQA has five priority areas of focus for 2026: 1.) Rain Ready California Program, 2.) Our World, Our Water (OWOW) Program, 3.) Legislative Priorities focusing on Prop 218 reform, 4.) Regulatory Advocacy, and 5.) Funding. Cowen then provided an overview of CASQA's proposed strategic plan update. Cowen then provided an overview of CASQA's staff and CASQA's committee and program structure. Cowen then presented key dates including the upcoming Seminar Series presentation, and the October 26-28 CASQA Annual Conference in Sacramento. Cowen ended by stating that CASQA can work with C/CAG and C/CAG's legislative consultants to do more to make local staff aware of current bills that may impact municipal stormwater programs.
4. ACTION – The Committee approved the March 19, 2026 Stormwater Committee meeting minutes. Motion: Member Fabry (City of San Mateo); Second: Alternate Haya (City of Millbrae). Vote: Motion passed (13:0:1). Member Kim (City of South San Francisco) abstained.
5. INFORMATION – The Committee received information on the status of compliance with the Municipal Regional Stormwater Permit (MRP) C.10 trash requirement. Chris Sommers of EOA Inc. presented on the status of permittee compliance after the MRP 3 Full Trash Capture deadline in June 2025. Sommers began by provided a historical context of the trash management requirements over MRP 1, 2, and 3. Sommers then discussed the compliance status of SMCWPPP member agencies before providing a summary of trash control measures implemented to date. Sommers then presented on the planned enforcement order process for agencies that submitted notices of non-

compliance in June and will not achieve 100% load reductions by January 2026, as well as the planned process for agencies that did not achieve 100% trash reduction by the end of June but will be achieving compliance by January 2026 and hence will not be receiving enforcement orders. Sommers ended by covering anticipated changes in the trash requirements for MRP 4.

6. INFORMATION – The Committee received information on the preliminary Fiscal Year 2026-27 Stormwater Program Budget. Reid Bogert (C/CAG) provided an overview of the preliminary Fiscal Year 2026-27 budget highlighting how the NPDES Fund has static revenue while costs continue to rise and that SMCWPPP is facing a structural deficit for the program beginning Fiscal Year 2026-27. Bogert continued by providing an overview of historic annual consultant services costs dating back to FY3 and the average consultant services costs from MRP 1 to MRP 2 to MRP 3. Bogert then presented an estimated projection with different scenarios for MRP 4 program costs. Bogert described how the SMCWPPP budget deficit issue will be presented to the C/CAG Finance Committee with options on how to address the deficit. Bogert ended with the next steps, which include approving the final budget/ Consultant Task Order for Fiscal Year 2026-27 at the C/CAG Board Meeting in June, and presenting to the C/CAG Finance Committee in May/June.
7. INFORMATION – The Committee received information on the development of the Regional Climate Change Adaptation Report. Bogert provided an overview of the regulatory context of the report. The MRP requires the report to be completed by September 30, 2026. The report may be developed on an all-Permittee (regional) scale or countywide scale. The report is being developed on a regional scale but may include strategies that are implemented at the countywide and/or local levels. The CCAR will serve as a regional framework and guidance for adaptation of assets to address climate risks that can be incorporated into countywide C.3/GI guidance manuals and asset management plans as appropriate. Bogert then provided examples of adaptation strategies, as well as existing resources. Lastly, Bogert provided a timeline for the next steps including: 1.) Complete Draft CCAR – March/April 2026, 2.) Complete Revised Draft CCAR – early June 2026, 3.) Complete Final Draft CCAR – early August 2026, 4.) Approvals by Countywide Programs and BAMSC – August 2026, and 5.) submit with Countywide Program Annual Reports – September 2026.
8. INFORMATION – The Committee received stormwater program related information and announcements. Dan Sternkopf (C/CAG) presented that in March, the C/CAG Board approved Resolution 26-12 authorizing the C/CAG Executive Director to execute an Agreement with Caltrans for the Clean California Community Cleanup and Employment Pathway Grant Program. Sternkopf then discussed how Regional Water Board (RWB) staff shared FY24-25 Annual Report comments with all permittees with varying comments and requests for information. RWB staff requested that all permittees submit a summary of Best Management Practice (BMP) implementation effectiveness for BMPs implemented under Provision C.17 (Unsheltered Populations), citing that the Annual Reports lacked sufficient information to meet the reporting requirement. RWB staff have requested these summaries to be provided by no later than June 1, 2026, though Program Staff will plan to request an extension. Sternkopf then provided a legislative update on AB 2051 (Wicks) and SB 601 (Allen). Related to the C.15 Firefighting Discharges Coordination, C/CAG staff met with the Fire Chiefs Association of San Mateo County on April 1 to develop a coordination process, and to facilitate a survey to each of the fire departments. Additionally, the Workgroup Advancing Regional Projects (WARP) met on April 2 to discuss options for ongoing funding for operations and maintenance (O&M) for the Orange Memorial Park project. Lastly, Sternkopf shared an update on funding opportunities focusing on 1.) congressional community-directed spending requests to the offices of

Senators Schiff and Padilla and Congressmember Mullin, 2.) Prop 4 (Climate Bond) CNRA Urban Greening Grant, and 3.) USBR WaterSMART Drought Response Program.

9. Regional Water Board Report – Ashraf Ali of the Regional Water Board (RWB) reported that staff are looking forward to commencing MRP 4 workgroup meetings at the end of the month.
10. Executive Director’s Report – Sean Charpentier stated that it is a good time for committee members to think about coordinating meetings with the state legislators and their staff to stay informed of current and upcoming legislation that may affect local municipal stormwater programs. Charpentier also announced his planned departure from C/CAG, thanking the Committee for their support in implementing C/CAG’s stormwater program and stating this would be his last meeting.
11. Member Reports – A question was raised about Committee member experiences with artificial turf drainage systems compared to grass drainage systems and which system is less impactful on the environment and public health. Responses clarified there is no easy answer because it depends on how those systems are designed and the underlying layers and soil conditions for each site.
12. Meeting Adjourned at 4:00 p.m.

April 16, 2026 Stormwater Committee Attendance				
Agency	Attendance			
	Representative (Primary or Alternate)	In-Person	Remote Voting (AB 2449)	Remote Non-voting
Atherton	Robert Ovadia (Vice Chair) - Public Works Director	X		
Belmont	Edric Kwan - Public Works Director	X		
Brisbane	Maziar Bozorginia (Vice Chair) - Director of Public Works			
Burlingame	Noah Craney - Environmental Compliance Manager (Alternative)	X		
Colma	Brad Donahue - Public Works Director	X		
Daly City	Richard Chiu - Director of Public Works	X		
East Palo Alto	Anwar Mirza - City Engineer (Alternate)	X		
Foster City	Andrew Brozyna - Public Works Director			
Half Moon Bay	Todd Seely - Interim Public Works Director			
Hillsborough	Paul Willis - Public Works Director	X		
Menlo Park	Azalea Mitch - Director of Public Works			
Millbrae	Ahmad Haya - City Engineer (Alternate)	X		
OneShoreline	Summer Bundy - Projects Director			
Pacifica	Roland Yip - City Engineer			
Portola Valley	Vacant			
Redwood City	Paige Saber - Senior Civil Engineer (Alternate)	X		
San Bruno	Matt Lee - Public Works Director	X		
San Carlos	Tracy Scramalgia - Assistant Public Works Director (Alternate)	X		
San Mateo	Matt Fabry - Public Works Director	X		
South San Francisco	Eunejune Kim - Director of Public Works	X		
Woodside	Louis Sun - Director of Public Works			
San Mateo County	Tory Newman - Public Works Director	X		
Regional Water Quality Control Board	Watershed Supervisor			O
X - primary or designated alternate representative		14	0	0
O - "other" agency representative/non-voting (see meeting minutes for "other" attendees)		Quorum	14	
Start/End	2:42/4:00			
Other attendees (in-person)				
Sean Charpentier				
Reid Bogert				
Dan Sternkopf				

Member Reports: C factor on turf/grass fields and SWC location moving forward (Belmont EOC as of May)

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Climate Change Adaptation Report at the August 27 BAMSC Steering Committee.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Climate Change Adaptation Report at the August 27 BAMSC Steering Committee.

BACKGROUND/DISCUSSION

Provision C.21 of the current Municipal Regional Stormwater Permit (MRP 3) requires that each Permittee develop and implement an Asset Management Plan that includes an asset inventory, condition assessment, and actions to address the maintenance of stormwater quality-related hard assets constructed during MRP 3 and previous permit terms pursuant to relevant MRP Provisions (e.g., C.2, C.3, C.10). The effects of climate change are expected over time to potentially influence the condition, performance and maintenance of existing assets as well as the design and construction of future assets. MRP Provision C.21.b.v requires Permittees to complete a Climate Change Adaptation Report (CCAR) to identify potential climate change-related threats to assets and appropriate adaptation strategies. The report is intended to assess existing, new, and increasing threats from climate change to the condition of inventoried hard water quality assets over the next 50 years and identify approaches that may be implemented to address those threats. Examples of potential adaptation strategies stated in the permit could include the modification of design standards and countywide technical guidance documents. The MRP also directs Permittees to coordinate at the regional scale to develop a CCAR collectively and requires the CCAR to be submitted to the Regional Water Quality Control Board with the Permittees' 2026 Annual Reports. The CCAR was prepared as part of a Bay Area Municipal Stormwater Collaborative (BAMSC) project of regional benefit on behalf of all MRP Permittees.

The CCAR focuses on climate impacts to inventoried hard assets, which generally fall into one of three types of stormwater quality controls: Low Impact Development (LID)/Green Stormwater Infrastructure (GSI); non-LID controls (such as high flow rate media systems); and trash controls. Many of the CCAR climate impact and adaptation strategies for policy, planning, implementation and maintenance of GSI are drawn from examples provided in the Climate

Resilience Resources Guide, developed by the National Green Infrastructure Leadership Exchange – a collaborative multi-agency project led by C/CAG. The climate scenarios presented in the San Francisco Bay Conservation and Development Commission (BCDC) Regional Shoreline Adaptation Plan, among other state, regional and local data and tools, were also a key resource in developing the CCAR.

The initial draft CCAR was circulated to the SMCWPPP agencies for review on May 29 with a deadline for comments on June 10. Program staff received comments from City of San Bruno staff. The revised draft CCAR was circulated to SMCWPPP agencies for review on July 2 with comments due July 15. No additional comments were received from SMCWPPP Permittees. The BAMSC CCAR Workgroup has since incorporated comments from the respective countywide programs and finalized the report, and C/CAG staff circulated the final report to the Committee on August 7.

Program staff recommend the Committee review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Climate Change Adaptation Report at the August 27 BAMSC Steering Committee.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. None.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Effectiveness Evaluation of the Protocols for Managing PCBs-containing Materials During Building Demolition Project Report at the August 27 BAMSC Steering Committee.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Effectiveness Evaluation of the Protocols for Managing PCBs-containing Materials During Building Demolition Project Report at the August 27 BAMSC Steering Committee.

BACKGROUND/DISCUSSION

During the previous permit term of the Municipal Regional Stormwater Permit (MRP) Permittees were required to develop and implement or cause to be developed and implemented an effective protocol for managing materials with PCBs concentrations of 50 parts per million (ppm) or greater in applicable structures at the time these structures undergo demolition preventing PCBs from entering the municipal storm drain systems. Applicable structures include, at a minimum, commercial, public, institutional and industrial structures constructed or remodeled between the years 1950 and 1980 with building materials with PCBs concentrations of 50 ppm or greater. Single-family residential and wood frame structures are exempt. Permittees were required to develop a Building Demolition Protocol by June 30, 2019 including the necessary authority to ensure that PCBs do not enter municipal storm drains from PCBs-containing materials in applicable structures during demolition, a method for identifying applicable structures prior to their demolition, and method(s) for ensuring PCBs are not discharged to the municipal storm drain from demolition of applicable structures.

During the current permit term (MRP 3), Permittees are required to continue to implement the Building Demolition Protocols developed during the previous permit term for managing PCB-containing materials and wastes during building demolition so that PCBs do not enter municipal separate storm sewer systems (MS4s). Additionally, Permittees are required to implement the following enhancements to their PCBs control programs starting July 1, 2023, to meet the MRP3 requirements:

- For applicable structures containing building materials with PCBs 50 ppm or greater:

- Demolition contractors must provide notification to the Permittee, the Water Board, and the United States Environmental Protection Agency (USEPA) at least one week before any demolition is to occur;
- Permittees must enhance their construction site control programs to minimize migration of PCBs into the MS4 during demolition activities;
 - For demolition permits approved after July 1, 2023, Permittees must 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 or greater were disposed appropriately according to state and federal regulations; and
 - Beginning in the 2023 rainy season, Permittees must inspect demolition sites with applicable structures containing building materials with PCBs 50 ppm or greater pursuant to Provision C.6 to ensure that effective construction pollutant controls are used to prevent discharge into the MS4.
- Beginning with their 2023 Annual Report, the Permittees shall provide each of the following items: the number of applicable structures that applied for a demolition permit during the reporting year; 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. For each applicable structure, with PCBs concentrations of 50 ppm or greater or for demolition projects that are permitted under emergency conditions to protect public health, Permittees must collect the following information for Annual Reports: the project address, the demolition date, and a brief description of the PCBs-containing materials.
- Beginning with their 2024 Annual Report, Permittees shall provide the following: whether the site was inspected during demolition, and for those cases where notification and advance approval from the USEPA 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 shall 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.

To comply with the MRP 3 requirement to develop an effectiveness evaluation of the PCBs control programs, the Bay Area Municipal Stormwater Collaborative developed the Regional Effectiveness Evaluation of the Protocols for Managing PCBs-containing Materials Project Report (Report) via a project of regional benefit. The Report includes quantitative evaluation of the key data, parameters and metrics from C.12.g reporting since the inception of the programs,

as well as a qualitative evaluation of aspects of the programs that have been working well and areas for potential improvement in terms of the application/certification process and program enhancements implemented during MRP 3.

The initial Draft Report was circulated to the SMCWPPP agencies for review on July 16 with a deadline for comments on July 28. Program staff received comments on the Draft Report from Town of Atherton staff. The revised Final Draft Report was circulated to SMCWPPP agencies on August 5 for consideration by the Stormwater Committee at its August 20 meeting.

Program staff recommend the Committee Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Effectiveness Evaluation of the Protocols for Managing PCBs-containing Materials During Building Demolition Project Report at the August 27 BAMSC Steering Committee.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. None.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Source Load Reduction Accounting for Reasonable Assurance Analysis 2026 Update at the August 27 BAMSC Steering Committee.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Source Load Reduction Accounting for Reasonable Assurance Analysis 2026 Update at the August 27 BAMSC Steering Committee.

BACKGROUND/DISCUSSION

During the prior Municipal Regional Stormwater Permit (MRP), Provisions C.11.b and C.12.b required Permittees to develop and implement an assessment methodology and data collection program to quantify mercury and polychlorinated biphenyls (PCBs) loads reduced through implementation of pollution prevention, source control, and treatment control measures. The Bay Area Stormwater Management Agencies Association (BASMAA) prepared the Interim Accounting Methodology for TMDL Loads Reduced report, which was approved by the San Francisco Bay Regional Water Quality Control Board (Water Board) for use during the MRP permit term from January 1, 2016 through June 30, 2022 (MRP 2). The Permittees used this assessment methodology to demonstrate progress towards achieving the load reductions required in MRP 2. In 2021 and 2022, BASMAA revised the Interim Accounting Methodology to address the requirements of MRP 2 Provisions C.11.b.iii.(3) and C.12.b.iii.(3), which required the Permittees to submit, for Executive Officer approval, refinements to the Interim Accounting Methodology to assess mercury and PCBs load reductions in the next permit term (i.e., MRP 3). The Source Control Load Reduction Accounting for Reasonable Assurance Analysis report was approved by the Water Board in January 2022.

MRP 2 Provisions C.11.d. and C.12.d. required the Permittees to prepare plans and schedules for mercury and PCBs control measure implementation and a reasonable assurance analysis (RAA) demonstrating that those control measures will be sufficient to attain the mercury total maximum daily load (TMDL) wasteload allocations by 2028 and the PCBs TMDL wasteload allocations by 2030. MRP 3 Provisions C.11.f and C.12.h required the Permittees to revise the TMDL Control

Measure Plan and RAA reports submitted in 2020. The Source Control Load Reduction Accounting for Reasonable Assurance Analysis report was used by the Permittees for source control load reduction accounting in the 2020 and 2026 RAAs and for load reduction accounting during MRP 3, which is due to the Water Board in the September 2026 Annual Report.

This report refines the Source Control Load Reduction Accounting for Reasonable Assurance Analysis report for the purposes of source control load reduction accounting during the next permit term (i.e., MRP 4.0) in compliance with MRP Provisions C.11.a.iii.(3) and C.12.a.iii.3. The Bay Area Municipal Stormwater Collaborative (BAMSC) developed Source Control Load Reduction Accounting for Reasonable Assurance Analysis 2026 Update on behalf of all MRP Permittees.

The initial draft report was circulated to the SMCWPPP agencies for review on June 11 with a deadline for comments on June 24. Program staff provided comments on behalf of SMCWPPP permittees. The revised final draft reports was circulated to SMCWPPP agencies on August 5 for consideration by the Stormwater Committee at its August 20 meeting.

Program staff recommend the Committee Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Source Load Reduction Accounting for Reasonable Assurance Analysis 2026 Update at the August 27 BAMSC Steering Committee.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. None.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Supplement for New and Redevelopment at the August 27 BAMSC Steering Committee.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) review and approve a recommendation for C/CAG's Stormwater Program Director to approve the BAMSC Regional Supplement for New and Redevelopment at the August 27 BAMSC Steering Committee.

BACKGROUND/DISCUSSION

Provision C.3.j.iv of the San Francisco Bay Municipal Regional Stormwater Permit (MRP), requires Permittees to document and report on activities related to “participating in processes to promote green infrastructure.” Over the years, the Permittees and Programs operating under the MRP have chosen to report on these activities at a regional level via the Bay Area Municipal Stormwater Collaborative (BAMSC) and by developing a Regional Supplement for New Development and Redevelopment (Regional Supplemental, Attachment 1). Most of the 2024-25 reported activities under Provision C.3.j.iv covered in the Regional Supplemental were met completely by BAMSC member activities as documented in the report, except where otherwise noted or by Permittees in their own reports. As in prior years, several activities documented in the Regional Supplement were supported or implemented directly by the San Mateo Countywide Program Director on behalf of the San Mateo County Permittees and the BAMSC.

Via the BAMSC, Bay Area MRP Program and Permittee representatives contributed to the final draft Regional Supplemental, the final draft of which was circulated to the Stormwater Committee on August 7. Staff recommend the Committee review and approve a recommendation for C/CAG's Stormwater Program Director to approve the final draft Regional Supplemental at the August 27 BAMSC Steering Committee.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. None.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director

Subject: Receive information and guidance on the Municipal Regional Stormwater Permit Provision C.21 Asset Management requirements regarding asset condition assessment.

(For further information or questions contact Reid Bogert at rbogert@smcgov.org)

RECOMMENDATION

That the Committee receive information and guidance on the Municipal Regional Stormwater Permit Provision C.21 Asset Management requirements regarding asset condition assessment.

FISCAL IMPACT

N/A

SOURCE OF FUNDS

N/A

BACKGROUND/DISCUSSION

Provision C.21 of the Municipal Regional Stormwater Permit (MRP) requires each permittee to develop and implement an Asset Management Plan in order to ensure the satisfactory condition of all hard assets constructed to comply with various provisions of the MRP, such as Provision C.3 (New and Redevelopment Controls), C.10 (Trash Load Reduction), and C.12 (PCBs Controls).

The MRP defines hard assets, in the stormwater context, as publicly-owned structural controls that serve a water quality function. Examples provided in the MRP to illustrate this concept include bioretention areas, pervious pavement systems, and full trash capture devices. Permittees were required to develop an Asset Management Plan by June 30, 2025, and begin implementing the Plan by July 1, 2025.

Plans must be submitted to the Water Board with the 2025 Annual Report and implementation reports must be submitted beginning with the 2026 Annual Report. The MRP also requires reassessment and updates to Asset Management Plans on an as-needed basis, to address changing conditions and resources.

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) has formed an Asset Management Workgroup to support the development of materials and guidance for San Mateo County permittees towards achieving the MRP asset management requirements. On June 16, the SMCWPPP Asset Management Workgroup was convened to receive information and guidance on the asset management reporting requirements for Fiscal Year 2025-26, with a focus on how to conduct condition assessments for the entire inventory of assets in each permittee's Asset Management Plan. Program staff subsequently circulated the SMCWPPP Asset Condition Assessment Memo (Attachment 1), which provides further detail on how to operationalize an asset condition assessment methodology into the Asset Management Plan process and the specific reporting requirements due with the Annual Reports this fall.

C/CAG program staff and consultants will provide a verbal presentation of the MRP asset management requirements with a focus on the current Fiscal Year reporting requirements related to asset conditions assessment, as well as considerations for addressing risk and consequence of failure of assets, which in addition to condition assessments can help prioritize limited resources for maintaining and rehabilitating water quality controls through the Asset Management Plans.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration/operations of C/CAG.

ATTACHMENTS

1. SMCWPPP Asset Management Condition Assessment Memo (July 2026)

The attachment is available on the C/CAG website (See "Additional Agenda Materials" for the relevant Committee Meeting) at: <https://ccag.ca.gov/committees/stormwater-committee/>

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Dan Sternkopf, Senior Stormwater Program Specialist

Subject: Receive information on the reissuance of the Municipal Regional Stormwater Permit.

(For further information or questions contact Dan Sternkopf at dsternkopf@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) Receive information on the reissuance of the Municipal Regional Stormwater Permit.

BACKGROUND/DISCUSSION

The current iteration of the Municipal Regional Stormwater Permit (MRP 3) which was adopted by the San Francisco Bay Regional Water Quality Control Board (Regional Water Board) in May 2022, effective July 1, 2022 (amended October 2023), has a current expiration date of June 30, 2027. The Bay Area Municipal Stormwater Collaborative (BAMSC) and Regional Water Board staff initiated the reissuance process in October 2025 and have since convened a number of workgroups to support the reissuance process, focusing on key high priority provisions where there are substantial changes being proposed. While the original plan was to have a new permit (MRP 4) adopted in May or June of 2027 with an effective date on July 1, 2027, Regional Water Board staff have indicated they intend to postpone the reissuance and to allow more time for drafting the permit, receiving input from stakeholders and for countywide program budgeting purposes. To accommodate this modified schedule, Regional Water Board staff plan to administratively extend the MRP 3 for one year. The current updated MRP 4 reissuance schedule is as follows:

MRP 4 Reissuance Schedule (updated 7/21/2026)			
Task Name	Start	Finish	Duration (days)
Permit reissuance kickoff meeting	10/30/2025	10/30/2025	0
Provision-specific workgroup meetings	4/2/2026	10/9/2026	190

Water Board staff write Administrative Draft Tentative Order (provisions only)	5/1/2026	12/31/2026	244
Report of Waste Discharge due	12/31/2026	12/31/2026	0
Permittee and U.S. EPA informal comment period - Administrative Draft (provisions only)	1/4/2027	2/18/2027	45
Public Comment Period - formal draft	4/14/2027	6/13/2027	60
Board Workshop	5/12/2027	5/13/2027	2
Board meeting - Adoption Hearing	10/13/2027	10/14/2027	2
Effective date of reissued permit	7/1/2028	6/30/2033	5 years

The current MRP 4 workgroups include the following categorized by priority:

High Priority: C.3 – New Development and Redevelopment, C.8 – Water Quality Monitoring, C.10 – Trash Load Reduction, and C.11/12 – PCBs and Mercury Load Reductions. These workgroups meet on an as-needed basis and typically follow the schedule of monthly or bi-monthly meetings. At these meetings, BAMSC permittees and program managers share concerns, constructive feedback and lessons learned with Regional Water Board staff related to their experiences in implementing the high-priority provisions during the MRP 3 term.

Medium Priority: C.5 – Illicit Discharge Detection and Elimination, C.6 Construction Site Controls, C.14 – Bacteria Control for Impaired Water Bodies, C.15 – Exempted and Conditionally Exempted Discharges, C.17 – Unsheltered Homelessness, C.20 – Cost Reporting, and C.21 – Asset Management. These workgroups are in the process of being formed and having their initial kick-off meetings.

Low Priority: Two meetings were held in early 2026 for “low priority” provisions – for which permittees and Regional Water Board staff do not anticipate significant changes being made – including: A – Discharge Prohibitions, B – Receiving Water Limitations, C.1 – Compliance with Discharge Prohibitions and Receiving Waters Limitations, C.2 – Municipal Operations, C.4 – Industrial and Commercial Site Controls, C.6 – Construction Site Control (moved to “medium priority”), C.7 – Public Information and Outreach, C.9 – Pesticides Toxicity Control, C.13 – Copper Controls, C.16 – Discharges to Areas of Special Biological Significance, C.18 – Control of Sediment Discharges from Coastal San Mateo County Roads, C.22 – Annual Reports, C.23 – Modifications to this Order, and C.27 – Effective Date.

Program staff have requested participation in the above workgroups among San Mateo County permittees and staff continue to encourage participation by permittee representatives. Information from past workgroup meetings is also made available to San Mateo County permittees through the Quarterly Digests that Program staff distribute to the Stormwater

Committee and NPDES Technical Advisory Committee distribution lists.

Additionally, Regional Water Board staff recently provided an important reminder and update that the Reports of Waste Discharge (ROWDs) are due 180 days prior to MRP 3's expiration date, which is January 2, 2027, as part of the formal process of applying for the next NPDES MS4 permit. Being that January 2, 2027, is on a Saturday, Regional Water Board staff informed program managers to plan to submit the ROWDs by not later than Thursday, December 31, 2026. A numbered list of the materials that should be submitted as a part of the ROWDs for MRP 4 can be found below. As in past permit cycles, the ROWD will be developed by the Countywide Stormwater Program on behalf of the San Mateo County permittees, but the Duly Authorized Representatives from each local agency will need to certify by signature the submission to the Regional Water Board. The ROWD will include the following components:

1. A completed [Form 200](#)
2. A list of program member agencies and contacts
3. A list of documents incorporated by reference, including, but not limited to:
 - a. MOAs/MOUs confirming the relationship of the member agencies to the countywide program
 - b. BAMSC or related projects, such as projects of regional significance, being completed collectively
 - c. Annual Reports
 - d. Reasonable Assurance Analysis Reports for MRP Provisions C.11 and C.12
 - e. Provision C.8 Integrated Monitoring Report

Program staff will provide a verbal update of the overall reissuance process and implications for San Mateo County permittees this and next Fiscal Year.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. None.

C/CAG AGENDA REPORT

Date: August 20, 2026

To: Stormwater Committee

From: Reid Bogert, Stormwater Program Director and
Dan Sternkopf, Senior Program Specialist

Subject: Receive stormwater program related information and announcements.

(For further information or questions contact Dan Sternkopf at
dsternkopf@smcgov.org)

RECOMMENDATION

That the Stormwater Committee (Committee) receive stormwater program related information and announcements.

BACKGROUND/DISCUSSION

C/CAG's Stormwater Committee provides policy and technical advice and recommendations to the C/CAG Board of Directors and direction to technical subcommittees on all matters relating to stormwater management and compliance with associated regulatory mandates from the State Water Resources Control Board and San Francisco Bay Regional Water Quality Control Board. Staff provides regular updates on information regarding stormwater compliance and other Countywide Stormwater Program activities, as detailed below for the month of March.

1) C/CAG Board updates:

- April: Approved Resolutions 26-19 and 26-20 authorizing the C/CAG Executive Director to execute Agreements with Climate Resilient Communities in an amount not to exceed \$42,000 and the San Jose Conservation Corps and Charter School in an amount not to exceed \$439,272 to implement the Green Workforce for Clean and Sustainable Streets project using Caltrans Clean California grant funds.
- June: Approved Resolution 26-41 authorizing the C/CAG Executive Director to execute Task Order EOA-19 with EOA, Inc. for an amount not to exceed \$2,130,000 for technical support services to the San Mateo Countywide Water Pollution Prevention Program for Fiscal Year 2026-27. Approved Resolution 26-45 adopting the final draft of C/CAG Fiscal Year 2026-27 Program Budget and member fees. Approved Resolution 26-46 appointing Kaki Cheung as the Interim Executive Director of C/CAG and approving associated compensation.

2) Annual Reports:

- FY24-25 Annual Reports – Regional Water Board staff have shared Fiscal Year 2024-25 Annual Report comments with all Municipal Regional Stormwater Permit (MRP) permittees with varying comments and requests for information among permittees. Generally, the comments focused on major milestone provisions (e.g., C.10 trash compliance and C.20 cost reporting) and also provisions that Regional Water Board staff provided comments on in Fiscal Year 2023-24. Water Board staff did request that all permittees submit a summary of Best Management Practice (BMP) implementation effectiveness for BMPs implemented under Provision C.17 (Unsheltered Populations) siting that the Annual Reports lacked sufficient information to meet the reporting requirement. Following initial Water Board staff communications regarding this request Water Board staff sent additional email communications on April 29, stating that the permittees did not need to submit a revised BMP effectiveness report and that the issue would be discussed among the Countywide Program Managers at a later date. The BAMSC program managers met with Regional Water Board staff on August 4 to discuss MRP coordination issues, including following up on the C.17 BMP effectiveness evaluation reporting from FY24-25. Water Board staff stated they still intend to follow-up regarding some permittees who did not provide effectiveness evaluation data for BMPs implemented under this provision. Additional feedback on provision C.21 asset management requirements was received by the Countywide Program Managers on July 31, which the SMCWPPP Program Manager circulated via email on August 10. Permittees may receive additional communications regarding C.21 reporting directly from Water Board staff.
 - FY25-26 Annual Reports – SMCWPPP hosted a series of “office hour” Annual Report training sessions over the last month for key permit provisions. The training sessions were recorded and the presentations and recordings are available for permittees to view on the password-protected training pages on www.flowstobay.org. Annual Reports are due September 30 and as in recent years, the Annual Reports will be submitted through the Stormwater Multiple Application and Reporting System (SMARTS) website via each permittee’s Legally Responsible Person, Duly Authorized Representative or authorized Data Entry Person. Program staff intend to bring a recommendation for approving and submitting the FY25-26 SMCWPPP Program Annual Report on behalf of the San Mateo County permittees at the September 17 Stormwater Committee meeting. As such only the jurisdictional Annual Reports will be submitted by the SMCWPPP permittees. As described in the Annual Report guidance memo Program staff sent to the SMCWPPP permittees on June 10, permittees should plan to send their draft reports to EOA for review (emailed to Helek Rutten at hrutten@eoainc.com) by Aug 31, at which time the draft SMCWPPP Annual Report will be distributed for permittee review. The C.10 sections for each jurisdiction will be distributed by Aug 17. Permittees that submit their draft reports to EOA will receive feedback by Sept 14 to prepare for final submittal at the end of the month.
- 3) Coastkeeper Petition: On June 1, 2026 the California Coastkeeper Alliance petitioned the San Francisco Bay Regional Water Quality Control Board (and five other regional waterboards throughout the state) to use its Residual Designation Authority (RDA) under CWA § 402(p)(2)(E) / 40 C.F.R. § 122.26(a)(9)(i)(C)–(D) to require National Pollutant

Discharge Elimination (NPDES) permits for privately-owned commercial, industrial, and institutional (CII) sites in the Colma Creek watershed. This was the same tool USEPA Region 9 used to pursue a new CII permit for two specific watersheds in LA (Dominguez Channel/LA-Long Beach Inner Harbor and Los Cerritos Channel/Alamitos Bay watersheds) in November 2024. The petition claims that for 303(d)-listed waterbodies in the watershed, CII facilities contribute ~53% of the Polychlorinated Biphenyls (PCBs) load and ~44% of the trash load despite only occupying ~20% of the watershed area. The petition also states that CII facilities contribute disproportionately high concentrations of other priority pollutants in the watershed and that these facilities are in close proximity to the creek channel making them a greater risk to discharge impacts. Broadly, the claims makes the case there is a significant regulatory gap regarding these facilities, and the Regional Water Board should use its authority to institute a new CII permit for these facilities in the Colma Creek Watershed, separate from the Municipal Regional Stormwater Permit. The Regional Water Board has 90 days after the filing of the petition to respond. Program staff will continue to monitor this issue along with the California Stormwater Quality Association.

- 4) Stormwater Legislation: C/CAG staff is tracking bills of interest in the California State Legislature the 2025-2026 Legislative Cycle, following state advocacy efforts by the California Stormwater Quality Association (CASQA), as detailed below:

Bill	Author	Summary	Current Status
SB 601	Allen	Establishes a "nexus waters" category under Porter-Cologne to close the state regulatory gap under the post-Sackett narrowing of federal WOTUS coverage.	Two-year bill. Passed Senate (2025); Failed in the House Approps (2026). The State Water Board (and a coalition of concerned organizations including CASQA) negotiated proposed amendments with the author's office; however the bill sponsor rejected the amendments and the revised bill did not pass out of the House.
AB 35	Alvarez	Exempts Prop 4 (2024 Climate/Water/Drought Bond, \$10B) program guidelines and selection criteria from the Administrative Procedure Act so agencies can deploy bond funds faster.	Signed by the Governor 7/16/2026.
AB 2218	Kalra	Establishes state policy acknowledging water-related inequities inflicted on California Native American tribes; requires state agency consultation, tribal water-use protections, and a mediation process via the Governor's Office of Tribal Affairs.	Passed Assembly unanimously. Passed Senate Environmental Quality (6/23/2026); now in Senate Appropriations.

AB 2322	Papan	Establishes a uniform statutory definition of "CII site" (commercial, industrial, or institutional site) for MS4 permitting purposes; stripped-down successor to the failed AB 1313 statewide CII permit bill.	Passed Assembly (5/18/2026); cleared policy committee; currently in Senate Appropriations (was on suspense file going into summer recess).
AB 2619	Papan	Requires data center owners/operators to disclose projected and actual water use (including an "indirect water use" metric tied to electricity generation) to water suppliers and on business license applications; directs DWR/CEC to develop water efficiency best practices by Jan. 2029.	Passed Assembly Local Government and Assembly Appropriations; currently in the Senate.
SB 1180	Allen	Adds statutory guardrails to the SB 54 California Plastic Pollution Mitigation Fund: outcome-based expenditure requirements, environmental-justice prioritization (60% of funds), simplified grant access, and annual public accounting.	Passed Senate; passed Assembly Natural Resources; now in Assembly Appropriations.

- 5) Fiscal Year 26-27 State Water Board NPDES Permit Fees: Under Title 23 of the California Code of Regulations and Water Code Section 13260 the State Water Board is required to charge permit fees that cover but do not exceed the actual cost of running the NPDES/waste discharge permit program, which includes issuing, reviewing, monitoring, and enforcing permits. Each year, the fee schedule is tied directly to the available funds the Legislature approves in that year's state Budget Act for the program. If the State Water Board collected too much or too little in the prior year compared to the identified target, it can adjust the current year's fees to correct the difference. To expedite the process and ensure the NPDES fees are adopted in a timely manner with the given state budget, the State Water Board adopts the fee schedule through an expedited ("emergency") rulemaking process. Each year, the State Water Board holds a series of stakeholder workshops on the proposed fees for the current fiscal year. For Fiscal Year 2026-27, the State Water Board Fee Branch is considering two fee scenarios: Scenario A - No Fee Changes Except Cannabis; Scenario B - Fee Changes (2% overall) Except Stormwater. NPDES Stormwater has a forecasted decrease

of -0.7%. NPDES Wastewater will increase by 1.2% if the board adopts this scenario. Attachment 1 includes the projected fee schedule for San Mateo County permittees based on population. The State Water Board permit fee adoption hearing is scheduled for September 15, 2026.

- 6) 2026 CASQA Annual Conference: The California Stormwater Quality Association (CASQA) is hosting its 2026 Annual Conference in Sacramento October 26-28, 2026. As permittees listed under SMCWPPP's areawide membership, San Mateo County permittee representatives are eligible to attend at the reduced member rate. Registration is open and early registration ends September 15. The agenda for the conference has been released and is available at the following link - <https://www.casqa.org/wp-content/uploads/2026/08/16310-CASQA26-PROGRAM-WEB-Agenda.pdf>

C/CAG staff are also presenting at the conference, including a technical presentation on the San Bruno Creek OneWatershed Pilot Study and two panels including a discussion on partnering with community-based organizations on water quality projects and green stormwater implementation challenges and opportunities.

- 7) Funding Opportunities: The Countywide Stormwater Program continues to track and evaluate funding opportunities to support program developments and C/CAG's member agencies with opportunities to fund local stormwater projects and programs. The California Grants Portal is a useful resource to track statewide and regional funding opportunities - <https://www.grants.ca.gov/>.
- Prop 4 (Climate Bond) - Authorized \$10B in general obligation bond funding for climate resilience, including stormwater capture projects and urban greening. Stormwater management is included with \$110M total allocated from the total bond authorization. The Draft Guidelines for this grant were released for public comment on July 14 with a revised comment deadline of August 24. The grant program will fund shovel-ready projects that demonstrate multiple stormwater management benefits as well as measurable flood risk reduction in an urban community. The program has a set aside of 40% of the available funds for disadvantaged communities and 10% of that for severely disadvantaged communities. There is no match requirement but projects that leverage matching funds will be scored higher. C/CAG is not planning to submit comments on the Draft Guidelines at this time; however, the California Stormwater Quality Association has a draft comment letter out for review by member agencies (Attachment 2). The comment letter focuses on recommendations to include a concept proposal phase, expanding the definition of eligible project areas and types from the existing "Urbanized Areas" and "Urban Stormwater Projects" language to specify areas with a threshold population and/or entities operating under an MS4 permit. The comment letter also recommends clarifying the language around planning level projects.
 - C/CAG has developed and submitted congressional community-directed spending requests to the offices of Senators Schiff and Padilla and Congressmember Mullin the week of March 9, including \$1.8 million under the Transportation, Housing and Urban Development account for funding additional design and construction funding for three

sustainable streets projects in East Palo Alto, Daly City and South San Francisco and \$1.5 million under the NOAA Coastal Zone Management account to develop a set of updated data, tools and resources to support climate resilience planning under the proposed OneWatershed Strategic Plan. The same budget requests have been submitted to the San Mateo County State Delegation for consideration as part of the State appropriations process. To-date, Congressman Mullin submitted a request for a reduced amount of \$500,000 for advancing the three sustainable streets projects listed above as part of the House Fiscal Year 2027 appropriations proposal, which is currently being considered in the Senate.

EQUITY IMPACTS AND CONSIDERATIONS

This item is necessary for the administration and operations of C/CAG.

ATTACHMENTS

1. San Mateo County State Water Board NPDES Permit Fee Projections for FY26-27
2. CASQA Comment Letter on the Draft Prop 4 State Water Board Grant Guidelines

Attachment 1

Table of State Water Resources Control Board NPDES Stormwater Fee Schedules for San Mateo County County Permittees

Municipality	Adopted 2019-20 (no change)	Adopted 2020-21 (5.3% increase)	Adopted 2021-22 (17.9% increase)	Adopted 2022-23 (no change)	Adopted 2023-24 (no change)	Adopted 2024-25 (3% increase)	Adopted 2025-26 (2% decrease)	Proposed for Adoption 2026-27 (0.7% decrease)
Atherton	\$5,692	\$5,994	\$7,067	\$7,067	\$7,067	\$7,279	\$7,132.97	\$6,633.66
Belmont	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Brisbane	\$5,692	\$5,994	\$7,067	\$7,067	\$7,067	\$7,279	\$7,132.97	\$6,633.66
Burlingame	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Colma	\$5,692	\$5,994	\$7,067	\$7,067	\$7,067	\$7,279	\$7,132.97	\$6,633.66
Daly City	\$35,577	\$37,463	\$44,168	\$44,168	\$44,168	\$45,493	\$44,583.57	\$41,462.72
East Palo Alto	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Foster City	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Half Moon Bay	\$8,539	\$8,992	\$10,601	\$10,601	\$10,601	\$10,919	\$10,700.71	\$9,951.66
Hillsborough	\$8,539	\$8,992	\$10,601	\$10,601	\$10,601	\$10,919	\$10,700.71	\$9,951.66
Menlo Park	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Millbrae	\$8,539	\$8,992	\$10,601	\$10,601	\$10,601	\$10,919	\$10,700.71	\$9,951.66
Pacifica	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
Portola Valley	\$5,692	\$5,994	\$7,067	\$7,067	\$7,067	\$7,279	\$7,132.97	\$6,633.66
Redwood City	\$28,461	\$29,969	\$35,334	\$35,334	\$35,334	\$36,394	\$35,666.10	\$33,169.47
San Bruno	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
San Carlos	\$14,230	\$14,984	\$17,666	\$17,666	\$17,666	\$18,196	\$17,832.42	\$16,584.15
San Mateo	\$35,577	\$37,463	\$44,168	\$44,168	\$44,168	\$45,493	\$44,583.57	\$41,462.72
South San Francisco	\$21,344	\$22,475	\$26,498	\$26,498	\$26,498	\$27,293	\$26,747.38	\$24,875.07
Woodside	\$5,692	\$5,994	\$7,067	\$7,067	\$7,067	\$7,279	\$7,132.97	\$6,633.66
San Mateo County Unincorporated	\$21,344	\$22,475	\$26,498	\$26,498	\$26,498	\$27,293	\$26,747.38	\$24,875.07
	\$310,220	\$326,662	\$385,134	\$385,134	\$385,134	\$396,688	\$388,754	\$361,541.55



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

[DRAFT] August 24, 2026

State Water Resources Control Board

Attention: Courtney Tyler, Clerk to the Board and Jennifer Toney

P.O. Box 100, Sacramento, CA 95812-0100

Via Email: commentletters@waterboards.ca.gov, Jennifer.Toney@waterboards.ca.gov

**Subject: Comments on State Water Resources Control Board's (State Water Board) Proposition 4
Stormwater Grant Program Guidelines (July 2026 Draft)**

Dear Ms. Tyler and Ms. Toney:

The California Stormwater Quality Association (CASQA),¹ appreciates the opportunity to provide comments on the Draft Proposition 4 Stormwater Grant Program Guidelines, as well as the extended public comment period. CASQA commends the State Water Resources Control Board's continued partnership and its work to identify funding mechanisms that support stormwater projects and programs throughout California. We also appreciate your upcoming participation in CASQA's Annual Conference on October 26-28, 2026 to share more information regarding this important stormwater funding opportunity with our members.

We represent a broad coalition of municipal stormwater agencies and organizations from across California, including cities, counties, and special districts. Our members reflect the state's geographic diversity, spanning urban, suburban, and rural communities, as well as coastal and inland regions. Despite their varied contexts, our members share a common commitment to manage stormwater as an essential component of the state's water resources, support human and ecological needs, protect water quality, and enhance and restore California's waterways, while building community climate resiliency.

The benefits of stormwater capture projects are evident in the 2024 CASQA report, *The Socioeconomic Value of Urban Stormwater Capture*², which found that, in addition to flood control and water supply benefits, every dollar spent on these types of stormwater projects has a one year return on investment, greatly increasing public health, access to green space, and more for local communities.

We applaud the State Water Board for including the following elements in the Draft Proposition 4 Stormwater Grant Program Guidelines:

- **Stormwater as a Resource:** Recognition of stormwater and dry-weather runoff as underutilized sources of surface water and groundwater supplies.

¹ CASQA is a nonprofit corporation with approximately 2,000 members throughout California and advances sustainable stormwater management protective of California water resources. Our membership is comprised of a diverse range of stormwater quality management organizations and individuals, including over 180 cities, 23 counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 26 million people in California.

² CASQA's *The Socioeconomic Value of Urban Stormwater Capture*, February 2024. Available at:
<https://www.casqa.org/wpcontent/uploads/2024/02/FINAL-The-Socioeconomic-Value-of-Urban-Stormwater-Capture-02-03-2024.pdf>

- **Multiple Benefits:** *The Guidelines recognize multiple benefits that can be achieved through the design and implementation of projects that may capture and use stormwater for a variety of potential benefits, including water supply, flood control, habitat enhancement/restoration, and creating green spaces.*
- **Optimizing Equity and Access** – *Structuring the grant program to maximize equitable access for all communities, specifically by including implementation grants of up to \$15 million per applicant, planning grants of up to \$750,000, and no required funding match. Together, these provisions can provide sufficient funding to advance meaningful projects while reducing financial barriers for stormwater agencies with limited existing resources, making the program more accessible to communities of varying sizes and fiscal capacity.*
- **Stormwater Resource Plan (SWRP) Requirements** - *Limiting SWRP revisions to agencies selected for funding and providing an exemption for qualifying disadvantaged communities, reduces application barriers and encourages broader participation.*

Recommendations and Comments

We offer the following comments and recommendations on the draft guidelines:

- **Add a Concept Proposal Phase** – *Incorporate a 30-day concept proposal or pre-application process similar to what was utilized for the Proposition 4 Urban Greening Grant Program managed by the California Natural Resources Agency (CNRA). This step will encourage more stormwater agencies to submit potential projects and assist the State in understanding the financial need for these types of projects. Initial feedback we are receiving is that smaller agencies lack the resources to develop a full application and may therefore not apply, assuming larger agencies will receive the funding. The goal for adding the concept proposals is to reduce any real or perceived barriers for access, to expand the pool of applicants, and ensure the process is as inclusive as possible. The concept proposal phase could be incorporated into the overall timeline currently envisioned for the Stormwater Grant Program.*
- **Modify the Definitions of “Urbanized Area” and “Urban Stormwater Project”** – *As presented on page 44, the current definition could exclude smaller jurisdictions that are nevertheless regulated under an MS4 permit. For example, the Town of Ross (population approximately 2,300) and Town of Yountville (population approximately 3,400) are regulated under the Small MS4 (Phase II) Permit but do not meet the 5,000-person population threshold. We therefore recommend revising the definition to state: “An area will qualify as urban if it contains at least 2,000 housing units, has a population of at least 5,000, or is subject to an MS4 stormwater permit.”*

CASQA also recommends separating “Urbanized Area” and “Urban Stormwater Project” into two definitions. The current definition establishes when an area is considered urban but does not define the characteristics of an eligible urban stormwater project. A separate definition could clarify that an Urban Stormwater Project is a project located in an Urbanized Area that infiltrates, filters, stores, treats, retains, captures, and/or uses stormwater or dry-weather runoff, including projects such as stormwater capture and use, recharge, green infrastructure, urban stream restoration, debris-flow mitigation, and projects that increase permeable surfaces to reduce flooding.

- **Clarify Planning Grant Criteria and Requirements** – *CASQA appreciates the inclusion of both Planning and Implementation Grants, which will allow projects at different stages of development to compete for funding. However, several provisions appear primarily structured around implementation-ready projects and*

do not clearly explain how they apply to Planning Grants. This is particularly important because the purpose of a Planning Grant may be to develop information. For example, the following would benefit from clarity for planning grants: feasibility analyses, project design, quantified benefits, process-flow schematics, environmental documentation, or other technical information—that would not yet be available at the time of application. CASQA recommends that the Guidelines expressly identify planning and design activities as eligible project types and reimbursable costs, and clarify how the project eligibility requirements, application attachments, workplan requirements, and technical review and scoring criteria apply to Planning Grants. Where information is expected to be developed through the Planning Grant, it should not be required as part of the initial application. To provide greater clarity for applicants, CASQA also recommends considering separate appendices for Planning and Implementation Grants.

- **Clarify SWRP, ASBS, and IRWM Requirements** – CASQA appreciates the Draft Guidelines’ efforts to streamline Stormwater Resource Plan (SWRP) requirements, including limiting revisions to projects selected for funding and providing an exemption for qualifying disadvantaged communities. CASQA recommends several clarifications to ensure these provisions are implemented as intended:
 - **SWRP Updates:** *Page 6 states that agencies receiving funding will be required to revise their SWRP. CASQA recommends clarifying that an SWRP revision is necessary only when a project selected for funding is not already included in the SWRP’s project list. If the project is already included, no revision should be necessary. The Guidelines should also clarify that, where the State Water Board has previously reviewed and concurred with an agency’s SWRP, subsequent updates to the project list do not require additional State Water Board review.*
 - **ASBS Compliance Plans:** *The Guidelines refer to projects “in” an Area of Special Biological Significance (ASBS). CASQA recommends clarifying that this provision applies to projects located within a drainageshed that discharges to an ASBS and that are covered under an approved ASBS Compliance Plan. Corresponding language in Appendix C should be revised for consistency.*
 - **SWRP Exemption and IRWM Plans:** *CASQA appreciates the SWRP exemption provided for qualifying disadvantaged and small disadvantaged communities (DACs/SDACs). However, the Guidelines also require SWRP-exempt projects to be included and implemented in an adopted Integrated Regional Water Management (IRWM) Plan. This could replace one administrative hurdle with another, particularly for resource-constrained communities or projects located outside an existing IRWM region. The Guidelines cite Water Code section 79740 as the basis for this requirement; however, CASQA understands this provision to be associated with Proposition 1 funding. CASQA recommends clarifying the statutory basis for applying the IRWM requirement to Proposition 4 funds and, if applicable, explaining how projects outside an existing IRWM region would satisfy the requirement and remain eligible for funding. Related requirements in Appendices A and C should be revised as necessary for consistency.*

Editorial Cleanup and Consistency

The following identifies several areas where targeted editorial revisions would improve clarity and consistency for applicants:

- **Innovative Technologies (Overview, I.B – Project Eligibility Requirements):** Delete or clarify the statement encouraging use of “new and innovative technologies or practices.” The term is undefined and could unintentionally impact applicants, including DACs and SDACs, that propose established and effective practices.
- **Required and Additional Benefits (Overview, I.D – Stormwater Management Benefits):** Clearly distinguish the minimum required benefits from additional benefits considered in project evaluation. The Guidelines should consistently state that eligible projects must address flooding in an urban area and provide either a water supply or water quality benefit, with other benefits identified and quantified as applicable.
- **CEQA Review (Overview, III.D – CEQA Compliance):** Clarify the process and anticipated timing for the State Water Board to complete its CEQA findings so applicants can appropriately account for this step in project schedules.
- **Water Metering (Overview, IV.D and Appendix D):** Clarify that the water-metering self-certification applies only to applicants subject to the applicable water-metering requirements, rather than all applicants.
- **Application Instructions (Appendix A):** Correct the Workplan page-limit discrepancy (“ten (20) pages”) in Attachment 1 and specify the page limit referenced for the Process Flow Schematic in Attachment 3.
- **Workplan Requirements (Appendix B):** Clarify or remove the undefined requirement to demonstrate that proposed elements are “technically appropriate.” Also clarify how requirements to describe water sources, flow cycles, the fate of water leaving the project, and locations and uses of water apply to stormwater projects.
- **Application and Scoring Terminology (Appendix C):** Reconcile terminology and project categories used in the Technical Review with those used in the Overview and Appendices A and B. In particular, define or reconcile “Corrective Purpose” and “Improvement Purpose”; align the Implementation Project Categories in Table 1 with the eligible project types; and clarify how “socioeconomic benefit” in Table 2 relates to the benefits identified in Section I.D.
- **Definitions (Appendix C and Appendix E):** Move or incorporate terms first introduced in the Appendix C “Primary Score Descriptions” into the overall glossary so applicants encounter consistent definitions throughout the Guidelines.
- **Consistent Eligibility Requirements (Overview and Appendix B):** Consistently state the core eligibility requirement that projects address flooding in an urban area and provide either a water supply or water quality benefit, including in the eligibility provisions and Implementation Project workplan requirements.
- **Stormwater Capture Terminology:** Use “stormwater capture and use,” rather than “capture and reuse,” consistently throughout the Guidelines.
- **Benefit Categories (Appendix B):** Reconcile the placement of stormwater capture metrics, including volumes captured, diverted, treated, infiltrated, and used and applicable design-storm information, so they are appropriately reflected within the Water Quality Benefits provisions rather than solely as Water Supply Benefits.

- **SWRP Scoring (Appendix C, Table 2):** *Revise the secondary scoring criterion requiring a project to be prioritized within the top 10 percent of an SWRP. Consistent with the Guidelines' eligibility framework, CASQA recommends that the criterion recognize whether the project is included in the SWRP, rather than its ranking under a separate SWRP prioritization process.*
- **CASQA** *recommends reconciling the Overview and Appendices A-C so that eligibility requirements, application instructions, project categories, defined terms, benefits, and scoring criteria use consistent terminology and requirements throughout the Guidelines.*

Thank you again for your partnership in advancing funding for this critical public infrastructure and for the opportunity to provide these comments. If you have any questions, please contact Shauna Morton at shauna.morton@casqa.org.

Sincerely,

Karen Cowan, Executive Director
California Stormwater Quality Association

cc: CASQA Board of Directors
CASQA Executive Program Committee
CASQA Policy and Permitting Subcommittee
CASQA Funding Subcommittee