

MANAGEMENT COMMITTEE INFORMATION PACKET



Santa Clara Valley *Urban Runoff* Pollution Prevention Program

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March 17, 2022 Meeting

MATERIALS FOR INFORMATION

II. March 17, 2022 Agenda

III. February 17, 2022 Meeting Minutes

IV. February 17, 2022 Action Items

VIII. MRP Implementation

1. Memorandum to Management Committee, from Program Staff, re: Management Committee Briefing on Priority Items, March 2022
2. Highlights of BAMSC Committee and Subcommittee Meetings, February - March 2022
3. SCVURPPP MuniOps AHTG Meeting Summary, March 3, 2022
4. Work Products Report, February 2022

Other Items

1. MC Calendar, March 2022 - May 2022
2. Letter from Jill Bicknell, SCVURPPP, re: Support for the Bay Area Older Adults' "Simple Solutions to Runoff Pollution Program" Grant Application, March 1, 2022
3. Letter to Tory Vizenor, DPR, from Jill Bicknell, SCVURPPP, re: Support for the City of Sunnyvale's application to the 2022 Alliance Grants Programs for its "Pesticide-free Sunnyvale: Live, Learn and Play the Less Toxic Way" project, March 1, 2022
4. Letter to Chris Beegan, SWRCB, from Karen Cowan, CASQA, re: CEQA Scoping Comment, March 7, 2022
5. Letter to Jim Scanlin and Beth Baldwin, ACCWP, Karin Graves and Mitch Avalon, CCCWP, Adam Olivieri, SCVURPPP, Reid Bogert, SMCWPPP, Emily Corwin, FSURMP, Jennifer Harrington, VFWD, from Thomas Mumley, RWQCB, re: Approval of Source Control Load Reduction Accounting for Reasonable Assurance Analysis required by Municipal Regional Stormwater NPDES Permit (MRP, Order No. R2-2015-0049, NPDES Permit No. CAS612008) Provisions C.11.b.iii(3) and C.12.b.iii(3), March 7, 2022



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AGENDA

MANAGEMENT COMMITTEE MEETING

March 17, 2022, 9:00am - 12:00pm

Conference Call/Zoom Meeting Only¹

- 9:00** **I. Management Committee Meeting Call to Order/Introductions**
- II. Additions or Revisions to Agenda; Announcements**
- III. Approval of Minutes (February 17, 2022 meeting)**
- IV. Review of Action Items from Last Meeting**
- 9:10** **V. Time Open for Public Comment on Any Subject Not on Agenda (2 minutes)**
- VI. Regional Water Board Staff Comments**
- VII. Program Business**
- 9:15** **A. Program Management / Action Items**
1. Draft FY 2021-22 Annual Report Template – *request for approval and direction to the Program Manager to submit to the Water Board via BAMS Collaborative by April 1, 2022.*
2. Water Year 2021 Urban Creeks Monitoring Report and Electronic Data Submittal – *request for approval.*
3. Draft FY 2022-23 Program Work Plan – *request for approval.*
4. Draft FY 2021-22 Mid-Year Program Manager Self Audit Report – *request for acceptance of draft report for first half of FY 2021-22.*
5. FY 2022-23 Program Manager Notice to Proceed as of July 1, 2022 – *request for approval.*
- B. Program Budget / MC Action Items**
- No items.

¹ *Due to the current public health order, the Management Committee meeting is being conducted via conference call and Zoom. Please contact Program staff via email at jcbicknell@eoainc.com if you would like to attend the meeting and we will provide the information.

9:50 C. Program Manager's Report

1. BAMS Collaborative Update – *information.*
2. CASQA Update – *information.*
3. Grants Update – *information.*

VIII. MRP Implementation

10:00 A. New Development and Redevelopment

1. Priority Items Identified by Program Staff
 - a. Green Stormwater Infrastructure Work Plan Tasks - *status report*
2. Management Committee Requested Items

10:05 B. Trash Controls

1. Priority Items Identified by Program Staff
 - a. Long-term Trash Load Reduction Guidance – *status report*
2. Management Committee Requested Items

10:10 C. Monitoring / Pollutants of Concern

1. Priority Items Identified by Program Staff
2. Management Committee Requested Items

10:15 D. Outreach Activities

1. Priority Items Identified by Program Staff
2. Management Committee Requested Items

10:20 E. Other Permit-Related Activities

1. Priority Items Identified by Program Staff – *none*
2. Management Committee Requested Items
 - a. Program Information Management Systems – *status report*

10:25 IX. Other Business

1. External Meeting Summaries – *questions on materials provided prior to the meeting*
2. Miscellaneous – *information from MC members*
3. AHTG Status Table – *updates requested*

10:30 X. CLOSED SESSION

The Management Committee will meet in closed session with Program Legal Counsel to discuss and receive legal advice concerning the renewal of the NPDES stormwater permit covering all 15 Program members and associated pending or anticipated litigation

12:00 XI. Adjourn



**MANAGEMENT COMMITTEE MEETING
MINUTES**

February 17, 2022

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I. MANAGEMENT COMMITTEE CALL TO ORDER / INTRODUCTIONS

John Bourgeois (Chair, Valley Water) called the meeting to order at 9:35 a.m. Management Committee (MC) members introduced themselves.

II. ADDITIONS OR REVISIONS TO THE AGENDA; ANNOUNCEMENTS

Sheila Tucker (WVCWA) requested that the MC discuss outreach and training needs pertaining to MRP 3.0 later in the MC agenda.

Vanessa Marcadejas (County) informed the MC that Jo Zientek (County of Santa Clara) is retiring. A job announcement was distributed to the MC.

III. APPROVAL OF MINUTES

Motion: Sheila Tucker (WVCWA) moved to approve the minutes from the January 20, 2022 MC meeting. **Second:** Rinta Perkins (Santa Clara). **Vote:** Motion passed unanimously.

IV. REVIEW OF ACTION ITEMS FROM LAST MEETING

Action Items from the January 20, 2022 meeting:

- Action Item 1-22-1 (Develop a request to the BATG for allocation of up to \$8,000 in carryover funds to an Earth Day Poster Contest and bring a recommendation to the MC for approval at its February 17th meeting) is complete. The budget request was sent to the MC on February 9, 2022 and the MC will consider approval at today's meeting.
- Action Item 2-22-2 (Create an expanded grant opportunities table and post it in a OneDrive shared folder) is complete. It will be discussed under the Agenda Item VII.C.3. Grants Update.
- Action Item 2-22-3 (Set up a meeting with MC members in early March to discuss information management needs) is in progress. Program staff will send a poll to schedule a meeting.

Action Items from previous meetings:

- Chris Sommers (Program staff) updated the MC on Action Item 11-21-1 (Discuss the content of the ABC Report at a future BATG meeting). Program staff have adequate information to address the MC's concerns and a meeting is not required. The MC agreed to remove this Action Item from the list of Action Items.
- Action Item 11-21-2 (Form a Work Group to discuss the content and format of the next Annual Program Summary) is in progress. Program staff will send an email to the MC to schedule a meeting in early March.
- Action Item 7-21-2 (Review the final CASQA Development BMP Handbook and provide a recommendation as to whether SCVURPPP should purchase a

subscription) is in progress. Program staff is reviewing the Handbook and will provide an update to the MC.

V. TIME OPEN FOR PUBLIC COMMENT ON ANY SUBJECT NOT ON AGENDA

No comments were made.

VI. WATER BOARD STAFF COMMENTS

Water Board (WB) staff did not attend the meeting. Chris reported that the WB has posted a job announcement for a new Executive Officer.

VII. PROGRAM BUSINESS

A. Program Management

1. Draft FY 21-22 Annual Report Template

Jill Bicknell (Program staff) reported that Program staff has developed the FY 21-22 Annual Report Template on behalf of all MRP Permittees. The template was shared with the BAMSC Collaborative and will be sent to the MC later today. Approval of the template will be requested at the March MC meeting.

B. Program Budget

1. Use of Funds Remaining from Previous Fiscal Years for a 2022 Earth Day Poster Contest

Chris reported that he sent an email on February 9, 2022 to the BATG and MC regarding the use of approximately \$8,000 remaining in unspent carryover funds from previous fiscal years for a Program-wide Earth Day Poster Contest for school age children. He asked the MC to consider approving this request.

Motion: John Bourgeois (Valley Water) moved to approve the use of the remaining in unspent carryover funds from previous fiscal years (~\$8,000) for a Program-wide Earth Day poster contest. **Second:** Carrie Sandahl (Mountain View) **Vote:** Motion passed unanimously.

Chris added that Program staff will send a memo on behalf of the MC to the fiscal agent documenting the approval of use of the carryover funds.

C. PROGRAM MANAGER'S REPORT

1. BAMSC Collaborative Update

Jill reported that per the MC's request, she forwarded the agenda for next BAMSC Steering Committee meeting to the MC. She provided the following updates from the January 27th meeting of the BAMSC Steering Committee.

- The Steering Committee discussed the BAMS website and agreed to share the costs for maintenance and updates, including the Surface Cleaners Program.
- Luisa Valiela (EPA) provided an update on grants. EPA will issue two Requests for Application (RFAs) in late March/early April: \$5 million for Water Quality Improvement Fund (WQIF) grants, and \$5 million for Bay Area grants from the Bipartisan Infrastructure Law (BIL).

- WB staff reported that they are considering phasing in some requirements in MRP 3.0. They are considering allowing permittees to do a pilot project to look at regional project benefits and how they can achieve LID and GSI goals. They plan to do a permit amendment during the permit term for the Contra Costa Regional Alternative Compliance project and other accommodations that may be considered for regional projects. WB staff will also look into how submittals required under MRP 3.0 that are due with FY 21-22 Annual Report should be addressed.
- WB staff is organizing a meeting on March 4 to discuss firefighting discharges. Jill, Kristin Kerr (Program staff), and a representative from Mountain View (Eric Anderson and/or Carrie Sandahl) will attend.

The MC requested a closed session immediately following the March 17th MC meeting to discuss legal implications of potential requirements in the revised MRP Tentative Order.

2. CASQA Update

Rinta Perkins (Santa Clara), Chris, and Jill provided the following updates:

- The CASQA Annual Conference will be held in-person on October 28-29 in Palm Springs.
- The presentations from the January CASQA Quarterly Meeting/Webcast are posted on the CASQA website. Meeting notes were emailed to the MC. One of the presentations covered the upcoming Clean Water Infrastructure Survey and the link to grant and CWSRF funding. The MC recommended that Program staff set up a meeting to guide municipal staff on completing the survey.
- CASQA is planning to fund a project to track legislative bills and has issued an RFP for consultant services. Two upcoming legislative bills of interest are AB 2113 (State Water Pollution Cleanup and Abatement Account) and AB 2106 (Water Quality Permits).
- CASQA is considering submitting a letter in support of AB 1690 which places a ban on single-use cigarette filters.

Action: Program staff will set up a meeting to discuss municipality participation in the Clean Water Infrastructure Survey.

3. Grants Update

Vishakha Atre (Program staff) updated the MC on the Grants Table posted on the shared OneDrive folder. The table includes tabs for active grants, upcoming grants/grant guidelines, and applied grants. The MC recommended adding columns describing eligible projects and relevant MRP provision for each grant.

VIII. MRP IMPLEMENTATION

A. NEW DEVELOPMENT AND REDEVELOPMENT

Program staff is forming Work Groups to work on updating the C3 Handbook and C3 outreach materials. Program staff is also working on GSI Vegetation Field Guide.

B. TRASH CONTROLS

Program staff is continuing to meet with Co-permittees to assist them develop their revised Long Term Trash Plans.

C. MONITORING AND POLLUTANTS OF CONCERN

Program staff is preparing the Water Year 2021 Urban Creeks Monitoring Report. It will be distributed to the Monitoring AHTG and the MC, and approval will be requested at the March MC meeting, along with the electronic data submittal. A presentation on the Program's Monitoring Plan will be scheduled after the April or May MC meeting.

D. OUTREACH ACTIVITIES

Program staff is continuing to work with the Earth Day Poster Contest Work Group to develop the poster contest.

E. OTHER PERMIT-RELATED ACTIVITIES

Jill informed the MC that a Construction Inspection Workshop is being held on March 9, 2022. Program staff is looking for Co-permittee volunteers to present at the workshop.

The MC discussed developing materials on MRP 3.0 for conducting outreach to municipal staff and officials. The MC recommended developing presentation decks, training videos, fact sheets, and information memorandums for including in Council materials. Program staff indicated that development of these materials will be conducted under Outreach to Municipal Officials task and that a schedule of deliverables will be developed and shared with the MC.

IX. OTHER BUSINESS

No updates

X. ADJOURN

The MC meeting adjourned at 11:00 a.m.

**Santa Clara Valley Urban Runoff Pollution Prevention Program
Management Committee Meeting Action Items**

Action Items from the February 17, 2020 Meeting

| Action | Description | Responsibility | Due Date | Status | Comments |
|---------------|--|-----------------------|-----------------|---------------|-----------------------|
| 2-22-1 | Set up a meeting to discuss the Clean Water Infrastructure Survey. | Program staff | April | To be done | Coordinate with CASQA |

Action Items Remaining from Previous Meetings

| Action | Description | Responsibility | Due Date | Status | Comments |
|---------------|---|-----------------------|-----------------|---------------|---|
| 1-22-3 | Set up a meeting with MC members in March to discuss information management needs. | Program staff | March | To be done | |
| 11-21-2 | Form a Work Group to discuss the content and format of the next Annual Program Summary. | Program staff | March | To be done | |
| 7-21-2 | Review the final CASQA Development BMP Handbook and provide a recommendation as to whether SCVURPPP should purchase a subscription. | Program staff | April | In progress | An individual subscription to the Handbook was purchased. |



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MEMORANDUM

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TO: Management Committee

FROM: Program Staff

DATE: March 11, 2022

SUBJECT: Management Committee Briefing on Priority Items

Program Management

- * Draft FY 21-22 Annual Report Template - The draft FY 2021-22 Annual Report Template for the last year of MRP 2.0 was prepared by Program staff for the BAMS Collaborative and is in the process of being reviewed and approved by the various stormwater programs prior to submittal to the Water Board by April 1. The changes are very minor and mostly consist of updating the fiscal years where appropriate. The template was provided to the Management Committee (MC) for review on February 18th and approval will be requested at the March 17th MC meeting.
- * Water Year 2021 Urban Creeks Monitoring Report and Electronic Data Submittal – Provision C.8 of MRP 2.0 requires the submittal of an Urban Creeks Monitoring Report (UCMR) each year by March 31st. A link to the draft report and attachments was distributed to the MC and Monitoring AHTG for review and comment on March 4th. The MC will be asked to approve the report and associated electronic data submittal at the March 17th meeting.
- * Draft FY 2022-23 Program Work Plan – The Final Draft FY 2022-23 Program Budget Package was approved by the MC at the January 20th MC meeting. Program staff developed the Draft FY 2022-23 Program Work Plan consistent with the approved budget. The Work Plan was sent to the MC for review on March 8th. Approval will be requested at the March 17th MC meeting
- * Draft Mid-Year FY 2021-22 Program Manager Self-Audit Report – Program staff completed development of the draft Self-Audit Report for the first half of FY 2021-22. This report describes Program staff's accomplishments in comparison to the Program Management contract and approved FY 2021-22 Work Plan. The Self-Audit Report was sent to the MC for review on March 8th and will be presented for acceptance at the March 17th MC meeting.
- * FY 2022-23 Program Manager Notice-to-Proceed – Following MC approval of the FY 2022-23 Program Budget Package (January MC meeting) and the FY 2022-23 Work Plan (March MC meeting) and acceptance of the draft FY 2021-22 Self-Audit Report (March MC meeting), the

Note: * indicates that Program staff has identified this item for discussion and/or consideration for approval at the Management Committee meeting.

MC will be asked to authorize the notice-to-proceed for the Program Manager for FY 2022-23 at the March 17th meeting. The authorization will be documented in the MC meeting minutes and provided as direction to the Program Fiscal Agent to execute the contract with the Program Manager.

- NPDES Permit Reissuance – Water Board (WB) staff released the MRP 3.0 Tentative Order for public comment on September 10th, and public workshops were held on October 12 and 13. The Program and legal counsel submitted comment letters with detailed attachments on behalf of Co-permittees on November 16th. MRP 3.0 adoption is tentatively planned for the May 11, 2022 WB meeting, and a revised TO and response to comments from WB staff is expected approximately 30 days in advance of the adoption hearing.
- AHTG Sharefolder – Program staff have created a share folder for all SCVURPPP AHTGs. The folder is accessible by all MC and AHTG members and contains materials/documents associated with each AHTG. The AHTG Status Table is also posted here for updates. You can access the share folder by clicking [here](#).

New Development and Redevelopment

- GSI Vegetation Guide – Program staff are working on a guidance document for SCVURPPP agencies focusing on GSI vegetation identification, characteristics, care, inspection and maintenance. A work group of Co-permittee and Program staff has met several times to provide input. The new version of the draft guide was previewed at the C3PO meeting on January 24th and was discussed by the Work Group at their last meeting on February 11th. The Work Group was asked to review the draft Guide and provide comments by March 1st. Program staff are now reviewing comments received by the Work Group and continuing to reach out to other parties for comment. Valley Water's plant list is also being reviewed with input from Valley Water staff. The date for the next meeting of the Work Group has not been set.
- GSI Handbook Part 2 – Program staff are continuing to revise the SFPUC details for general components related to bioretention and pervious pavement and complete other updates.
- Stormwater Treatment Measure (STM) Data Portal - Program staff is updating the Data Portal with FY 20-21 project data received to date. The C3PO AHTG will be informed when the Data Portal is updated to include FY 20-21 projects. Program staff will continue working individually with Co-permittees to resolve remaining data inconsistencies, add voluntary GSI projects and update new projects. Program staff strongly recommend Permittees submit the Stormwater Management Plan, typically a one-page construction plan sheet that shows the project boundary, DMAs, STM locations and DMA summary table, with each project. This plan sheet can be attached to the project record and provides details needed for Program staff to efficiently update records.
- LID Bioretention as Trash Full Capture –The long-term trash planning work being conducted through the Trash AHTG includes identifying GSI projects in the Data Portal that may be considered trash full capture systems. Program staff are providing support for this effort as needed, through analysis of Data Portal project data.
- C.3 Stormwater Handbook Update – Program staff are starting work on updates to this Handbook to include anticipated MRP 3.0 requirements and other needed changes. A work group of the C3PO AHTG has been formed to review the changes.
- C3PO AHTG – Next meeting is scheduled for March 28, 2022.

Industrial/Commercial Business Inspection

- IND/IDDE AHTG - The next AHTG meeting is scheduled for March 24th from 1:00-2:30pm via Zoom. An inspector training is tentatively scheduled for May 2022.

Municipal Maintenance

- Municipal Maintenance AHTG – The AHTG met on March 3rd. The meeting summary is in the packet. A Rural Roads BMP training is tentatively scheduled for April 2022.

Construction Controls

- Construction AHTG –The AHTG met on December 1st. The focus of the meeting was to discuss the construction site stormwater inspector training.
- Construction Inspector Workshop: The Construction Stormwater Inspector Training Workshop was held on March 9th from 9-11am. Over 124 people attended the workshop. An evaluation summary will be provided in next month's briefing memo.

Water Utility

- Water Utility AHTG – Program staff emailed the AHTG in early January a reminder that the State Drinking Water System Discharges General Permit Annual Report is due March 1, 2022.

Watershed Education and Outreach

- Earth Day Poster Contest – The Earth Day Poster Contest Work Group met on February 16 to further discuss the Program-wide Earth Day Poster contest. The contest will be launched in early March with submissions due on April 22, 2022.
- Watershed Watch Campaign FY 21-22 Mid-year Report - Program staff worked with the Watershed Watch consultant to prepare the draft Watershed Watch Campaign FY 21-22 Mid-year Report. It was sent to the WEO AHTG for review.
- City of San Jose's Anti-Litter Campaign with the Sharks - The City of San Jose is partnering with the San Jose Sharks to conduct outreach. SCVURPPP's funding will be used for bus shelter advertising. Program staff worked with City of San Jose staff to identify bus shelters located in areas of moderate to high trash generation. Program staff also coordinated with the Scripts Review Work Group to provide feedback on the draft advertisement.

Pesticide Control

- Outreach to Structural Pest Control Professionals - Program staff developed two versions of a postcard to conduct outreach to Structural Pest Control Professionals. Both were sent to the Scripts Review Work Group for comments. The postcard was finalized after two rounds of comments from the Scripts Review Work Group and will be mailed to all Structural Pest Control Professionals registered in Santa Clara County. The postcard will address the following requirement in Provision C.9.e.(3): "conduct outreach to pest control operators, urging them to promote IPM services to customers and to become IPM-certified".
- OWOW Store Visits – Program staff is conducting the second round of OWOW stores visits to update shelf-talkers and refill literature racks.

Watershed Management Initiative

- Land Use Subgroup (LUS) -- Program staff and LUS members are continuing to collaborate with the Steering Committee of the Peninsula-South Bay Watershed Forum (PSBWF) and other watershed partners on an approach to revitalize the WMI with focused working groups, including LUS, ZLI, WEO AHTG, and a new Watershed Health and Habitat group. The Subgroup met on January 19th and held a discussion on the topic of pedestrian/bicycle paths along riparian corridors with a panel of speakers including staff from Valley Water, the City of San José, Valley Transportation Authority (VTA), the Santa Clara Valley Audubon Society, the Silicon Valley Bicycle Coalition and the California Department of Fish and Wildlife. Approximately 65 people attended the Zoom meeting. The recording of the meeting is now

posted on the LUS webpage of the WMI website. The next meeting of the Subgroup on March 17, 2022 will discuss next steps and topics for future meetings.

- Zero Litter Initiative (ZLI) – The ZLI Steering Committee meets approximately monthly via Zoom. The chair of the Steering Committee is Ann Calnan from VTA. At the most recent meeting on March 4th, the following topics were discussed:
 - Results of applications submitted to Caltrans for the Clean California Local Grant Program;
 - Update on Keep Santa Clara County Beautiful actions and coordination;
 - Discussion and decision to invite waste hauler staff to future ZLI Steering Committee meetings;
 - Coordination with illegal dumping work and events by CalRecycle and in Alameda County; and
 - Action items for 2022.

At the next Steering Committee meeting, scheduled for April 1, 2022, the group will continue to discuss these items, have a presentation on SB 1383, and prepare topics for 2022-23.

Trash Controls

- On-land Visual Trash Assessments (OVTAs) – Program staff have continued to conduct OVTAs during FY 2021-22. Over 800 assessments have been conducted this FY.
- Long-term Trash Reduction Guidance – Program staff distributed the final work plan in January to the Trash AHTG for conducting guidance tasks during FY 2021-22. Draft outputs from Task 1 of the Work Plan were forwarded to Co-permittees during the week of January 17th. Meetings with Co-permittee staff were conducted in late January to discuss the results of Task 1 and next steps. Program staff have moved forward with follow ups to Task 1 and Task 2 in the Work Plan. Follow up meetings with Co-permittees are currently planned for mid/late March.
- Trash AHTG Meetings – The Trash AHTG typically meets on the 3rd Tuesday of the month. The last meeting was on February 15th (March meeting was canceled to allow for time to meeting individually with Co-permittees during mid/late March). The next AHTG meeting is scheduled for April 19th.

Monitoring / Pollutants of Concern

- Creek Status Monitoring – Creek Status Monitoring for Water Year (WY) 2021 is complete. Data analyses are complete and Program staff have drafted the WY 2021 Urban Creeks Monitoring Report and released to Co-permittees for comment in early March. Comments are due to Program staff by March 17th. The final version of the UCMR is due to the Water Board on March 31, 2022.
- Stressor-Source Identification (SSID) Projects
 - In September 2019, Program staff submitted a report to the Water Board on the SSID project conducted in Coyote Creek. Program staff received comments on the draft report on January 3rd, 2021. Program staff have formulated responses to the comments and developed a revised draft final report (included as part of the UCMR) for review by the Monitoring AHTG and MC. The responses and revised report will be discussed at the next Monitoring AHTG scheduled for March 24th. The revised final report will be submitted to the Water Board with the UCMR in March.
 - The Program recently completed an SSID project in Lower Silver/Thompson Creek, in compliance with provision C.8. Program staff developed a draft report that was distributed to the AHTG and MC for comment in early March as part of the UCMR. The draft report will be discussed at the next Monitoring AHTG scheduled for March 24th. The revised final report will be submitted to the Water Board with the UCMR in March.
- POCs Monitoring – WY 2022 monitoring began in October 2021. Sites have been selected based on data needs associated with characterizing old industrial areas. Program staff is

coordinating with Co-permittees as needed on site locations and monitoring. Stormwater monitoring has generally been on hold due to drought/lack of rainfall.

- PCB/Hg Source Identification Studies – Program staff continue to follow the Work Plan for conducting Source Property investigation activities. The status of these activities was discussed with the POC/RAA AHTG at recent meetings and will be reviewed at the next POC AHTG meeting on March 21st. Program staff have held meetings and are currently scheduling follow-up meetings with specific Co-permittees to discuss ongoing source property investigations and potential referrals to the Water Board.
- Tracking POC Control Measure Implementation – The Program’s Stormwater Treatment Measures Data Portal is available to the public at <https://scvurppp.org/gsi/>. The current structure of the database is in Phase I. Phase 2 is planned to be completed late in FY 2021-22. Additional functionality will be added to the database as well during future phases.
- Management of PCBs during Building Demolition – With assistance from Program staff, Co-permittees are using the information, tools and guidance provided via the BASMAA regional project to implement a PCBs in Building Demolition Management Program. Co-permittees should continue to implement the established PCBs in demolition program in FY 2021-22, consistent with guidance provided by Program staff.
- SF Bay Regional Monitoring Program (RMP) – Program staff serves as stormwater representatives on the RMP’s Steering Committee (SC) and Technical Review Committee (TRC). Program staff participates to ensure, to the extent possible, that information needs and priority projects for the RMP align with monitoring needs and requirements identified in the regional stormwater permit. The TRC last met in December and the Steering Committee met in January.
- Monitoring & Pollutants of Concern AHTG Meetings
 - The POC AHTG will meet on March 21st to discuss ongoing POC-related control program implementation and planning for implementation under MRP 3.0.
 - The Monitoring AHTG will meet on March 24th to discuss the draft UCMR and planning for monitoring under MRP 3.0.



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Highlights of Bay Area Municipal Stormwater Collaborative (BAMSC) Committee, Subcommittee and Work Group Meetings February - March 2022

Steering Committee – February 24, 2022

Co-Chairs – Reid Bogert (SMCWPPP) and Colleen Hart (Sonoma County)

SCVURPPP representatives – Jill Bicknell and Chris Sommers (Program staff)

Internal Meeting:

- Discussed the status of MRP 3.0 negotiations and planning for coordinated permittee presentations at the MRP 3.0 adoption hearing; and
- Discussed collaboration on development of cost reporting framework and guidance (C.20) and reconvening the Tracking/Reporting Work Group.

Main Meeting:

- Letter of Support for AB1690 (Rivas et al) – The Committee discussed whether to submit a letter of support for this bill that bans single use tobacco products (e.g., cigarette filters). BASMAA had drafted a letter supporting a similar bill in 2018. CASQA has not decided whether to submit. The Committee generally supported sending the letter and asked that a modified version of the previous draft be circulated for review.
- San Francisco Estuary Blueprint Update – Josh Bradt (SFEP) presented information on the stormwater-related tasks in the Blueprint and asked for BAMSC support as a collaborating agency. After some revisions to the task descriptions, the Committee agreed that BAMSC could be listed as a collaborating agency.
- Caltrans Update - Hardeep Takhar reported that additional money is available for local projects that treat Caltrans ROW via cooperative agreements. He is working on getting extensions for the SHOPP projects that plan to go forward. Mark Keiser presented information on their outreach campaign “Let’s Change This to That” and said they would be reaching out to collaborate with countywide programs.
- Regional Water Board Update - Keith Lichten provided some insights on Water Board staff’s progress on addressing comments on the Tentative Order (TO):
 - He confirmed that the adoption hearing will be on May 11 and will likely be in-person, although they are working on getting a contractor to run a hybrid meeting. He expects the revised TO to be available in the April 8-11 timeframe. He would like to discuss the hearing details at the March 24 BAMSC Steering Committee meeting, but expects that MRP permittees will have a block of time to provide comments like last time.
 - Future opportunities for engagement:
 - February 28 – Keith and Tom Mumley to meet with Chris Sommers to discuss trash monitoring
 - March 2 – C.8/C.11/C.12 Work Group meeting

- March 4 – C.15/Firefighting Discharges Work Group meeting
- March 29 (2:00-4:00 pm) – MRP 3.0 Steering Committee meeting
- C.3/GI Work Group meeting in late March (now scheduled for March 22)

Next Meeting – March 24, 2022

PIP Subcommittee - No February Meeting

Chair – Suzi Senna (SGA/SMCWPPP)

SCVURPPP representative – Vishakha Atre (Program staff)

Next Meeting – April 27, 2022, 1:30 – 3:00 pm (meets quarterly)

Development Subcommittee – No February Meeting

Chair – Pam Boyle Rodriguez (Palo Alto);

SCVURPPP representatives – Tiffany Ngo (San Jose), James Downing (Valley Water), Rinta Perkins (City of Santa Clara), Vishakha Atre (Program Staff), Peter Schultze-Allen (Program Staff)

Next Meeting – March 14, 2022 (meets quarterly)

Trash Subcommittee – No February Meeting

Chair – Beth Baldwin (CCCWP); *Vice-Chair* – Chris Sommers (SCVURPPP)

SCVURPPP representatives – Liz Neves (San Jose), Rinta Perkins (Santa Clara), Sheila Tucker (West Valley), and Chris Sommers (SCVURPPP).

Next Meeting – March 22, 2022

Monitoring/POCs Subcommittee - March 2, 2022

Chair – Lisa Sabin (SCVURPPP); *Vice-Chair* – Reid Bogert (SMCWPPP)

SCVURPPP representatives – Chris Sommers and Lisa Sabin (SCVURPPP), Simret Yigsaw (San Jose), and James Downing (Valley Water)

- MRP 3.0 Planning - The Subcommittee discussed the items on the agenda for the external portion of the MPC meeting with Water Board staff.
- Potential Projects of Regional Benefit – The Subcommittee continued to discuss ideas for potential USEPA Water Quality Improvement Fund (WQIF) Grant application(s) for future funding opportunities. Ideas included support for trash monitoring, LID monitoring, and canine-based PCB source identification. The group agreed to meet in early April to discuss development of a Technical Advisory Group (TAG) for LID and Trash monitoring.

Next Meeting – May 4, 2022

**Santa Clara
Valley Urban
Runoff Pollution
Prevention Program**

Date/Time: March 3, 2022, 9:00 am to 10:00 am

Place: Zoom

Who Attended: See attached sheet

**Municipal Maintenance Ad Hoc Task Group
Meeting Summary Report**

Key Issues Discussed:

- MRP 3.0 Status – The Regional Water Board has pushed back its schedule on the release and adoption dates of the new MRP. The adoption hearing of MRP 3.0 is planned for May 11, 2022. The revised Tentative Order (TO) and response to comments is planned to be released 30 days prior, in April. The effective date of the new MRP is July 1, 2022. Kristin presented the potential changes to Provision C.2 in MRP 3.0 and had poll questions for the Subcommittee to determine if Permittees would request Program assistance for developing standard operating procedures (SOPs), updating templates, providing guidance or training. The polls generally indicated a desire to receive some program assistance or to first discuss internally if assistance is needed. There was a request to update the Training Resource List on the SCVURPPP members only website to identify training resources that would meet the MRP 3.0 C.2 training topics. There was further discussion on the Provision C.2.f Corp Yard BMP Implementation wash water hauling requirement due to questions regarding wash water that normally drains to landscaped areas and sharing Permittee corporation yard SWPPPs. The presentation slides were included in the agenda packet.
- Rural Roads Training – The MRP Provision C.2 requires Permittees to provide training to rural public works maintenance staff at least twice during the permit term. SCVURPPP provided training on June 24, 2019. The classroom session video recording is available on the SCVURPPP members only website for use as internal training, as needed. A SCVURPPP Training Workgroup was formed to evaluate training needs for FY 20/21 and FY 21/22. The Training Workgroup decided to wait to hold a countywide rural roads training until FY 21/22. The training for FY 21/22 will most likely be in April 2022 and virtual due to potential conflicts in Permittees’ in-person meeting guidelines. However, a survey to gauge interest in an in-person training, specifically for a field session, will be sent to Permittees. Other ideas for the training were to have poll/quiz questions throughout the training to keep people engaged and present real scenarios/current projects.
- Emergency Regulations for Potable Water Use – The AHTG requested more information regarding the state’s Water Conservation Emergency Regulations, which became effective on January 18, 2022. The regulation includes the prohibition of potable water use for washing impervious areas. However, exceptions to this regulation seem to be allowed in instances where public health and safety are at risk. Valley Water staff offered to reach out to municipalities to provide assistance with recommendations for water conservation. More information on the regulations can be found here: https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/regs/emergency_regulation.html.

Next Steps:

- Program staff will email a survey to the AHTG regarding interest for a Rural Roads in-person training.
- Program staff will email a link to more information regarding the State's Water Conservation Emergency Regulations to the AHTG.

| | |
|--------------------|--------------------------|
| Location | Zoom |
| Date | March 3, 2022 9am-10am |
| Name | Agency |
| Alex Wykoff | Cupertino |
| | Los Altos |
| Dan Keller | Los Gatos |
| Glen Campi | Milpitas |
| Matt Lambert | Milpitas |
| Chris Fujimoto | Palo Alto |
| Brad Hunt | Palo Alto |
| Frank Penninger | San Jose |
| Simret Yigzaw | San Jose |
| Damaris Han | City of Santa Clara |
| Garik Iosilevsky | Santa Clara County |
| Vanessa Marcadejas | Santa Clara County |
| Zhenzhen Jiang | Santa Clara County |
| Lauren Sagun | Sunnyvale |
| Bob Wilson | Sunnyvale |
| James Downing | Valley Water |
| Julie Schaer | WVCWP |
| Sheila Tucker | WVCWP |
| Kristin Kerr | Program Staff - SCVURPPP |
| Kathy Woo | Program Staff – SCVURPPP |

Work Products Report - February 2022

Project Management Work Products

| Date | Product Name | Product Type |
|------|--|-----------------|
| | Management Committee Meeting Minutes - January 20, 2022 | Meeting Summary |
| | Management Committee Briefing on Priority Items | Briefing |

Regulatory Assistance Work Products

| Date | Product Name | Product Type |
|------|---|--------------|
| | Highlights of Bay Area Municipal Stormwater Coalition (BAMSC) Committee and Subcommittee Meetings January 2022 -February 2022 | Summary |

Performance Standard Work Products (C.2 - C.15)

| Date | Product Name | Product Type | Permit Provision |
|------|--------------|--------------|------------------|
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Scheduled Meetings and Deliverables

March – May 2022

March 2022

| | | |
|-----------|---|------------------|
| 2 | BAMS Collaborative Monitoring & Pollutant of Concern (MPC) Subcommittee 10:00 am – 2:00 pm | Zoom Meeting |
| 3 | SCVURPPP Municipal Maintenance AHTG 9:00am – 10:30am | Zoom Meeting |
| 4 | ZLI Steering Committee 9:00 am – 10:00am | Zoom Meeting |
| 9 | SCVURPPP Construction Stormwater Inspector Workshop 9:00 am – 11:30 am | Zoom Webinar |
| 14 | BAMS Collaborative Development Subcommittee 11:30 am – 1:30 pm | Zoom Meeting |
| 16 | WMI Land Use Subgroup 11:00 am – 12:30 pm | Zoom Meeting |
| 17 | SCVURPPP Management Committee 9:00 am – 12:00 pm <ul style="list-style-type: none"> • Approval of Draft FY 22-23 Work Plan • Acceptance of Draft Mid-Year FY 21-22 Self Audit Report • Approval of Program Manager Notice to Proceed • Approval of Urban Creeks Monitoring Report and Electronic Data Report • Approval of Draft FY 21-22 Annual Report Template | Zoom Meeting |
| 24 | BAMS Collaborative Steering Committee 10:00 am – 12:00 pm | Zoom Meeting |
| | SCVURPPP Monitoring AHTG 1:00 pm – 3:00 pm | Zoom Meeting |
| | SCVURPPP IND/IDDE AHTG 1:00pm – 2:30pm | Zoom Meeting |
| 28 | C3PO AHTG 1:30 pm – 3:00 pm | Zoom Meeting |
| 29 | MRP 3.0 Steering Committee 2:00 pm – 4:00 pm | MS Teams Meeting |

April 2022

| | | |
|-----------|--|--------------|
| 1 | ZLI Steering Committee 9:00 am – 10:00 am | Zoom Meeting |
| 6 | BAMS Collaborative LID/Trash Monitoring Coordination 10:00 am – 12:00 pm | Zoom Meeting |
| 19 | SCVURPPP Trash AHTG 1:00 pm – 3:00 pm | Zoom Meeting |
| 21 | SCVURPPP Management Committee 9:30 am – 11:00 am | Zoom Meeting |
| 28 | BAMS Collaborative Steering Committee 10:00 am – 12:00 pm | Zoom Meeting |

May 2022

| | | |
|-----------|--|----------------------------------|
| 4 | BAMS Collaborative Monitoring & Pollutant of Concern (MPC) Subcommittee 10:00 am – 2:00 pm | Zoom Meeting |
| 6 | ZLI Steering Committee 9:00 am – 10:00 am | Zoom Meeting |
| 11 | Water Board Adoption Hearing for MRP 3.0 Time TBD | Hybrid In-person/Virtual Meeting |
| 17 | SCVURPPP Trash AHTG 1:00 pm – 3:00 pm | Zoom Meeting |
| 19 | SCVURPPP Management Committee 9:30 am – 11:00 am | Zoom Meeting |
| 26 | BAMS Collaborative Steering Committee 10:00 am – 12:00 pm | Zoom Meeting |



Santa Clara Valley
Urban Runoff
Pollution Prevention Program

Campbell • Cupertino • Los Altos • Los Altos Hills • Los Gatos • Milpitas • Monte Sereno • Mountain View • Palo Alto
San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Valley Water

March 1, 2022

Subject: Support for Bay Area Older Adults' *Simple Solutions to Runoff Pollution Program* Grant Application

To Whom it May Concern:

On behalf of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), I am writing to support Bay Area Older Adults' (BAO) application to the Valley Water Standard Grant program for its *Simple Solutions to Runoff Pollution Program (SSRPP)*.

SCVURPPP is a consortium of fifteen municipal agencies in Santa Clara Valley that share a common National Pollutant Discharge Elimination System permit to discharge storm water to South San Francisco Bay. SCVURPPP helps its member agencies implement regulatory, monitoring and outreach measures for improving the water quality of the creeks of the Santa Clara Valley and the South San Francisco Bay.

One of the goals of the SSRPP is to prevent the pollution of our waterways by educating older adults about urban runoff pollutants, how they end up in the waterways, and the actions individuals can take to reduce runoff pollution. SCVURPPP strongly supports projects that educate Bay Area residents on preventing stormwater pollution. SCVURPPP will provide copies of its *You are the Solution to Stormwater Pollution* brochure to BAO for distribution to older residents through the SSRPP.

Thank you for your thoughtful consideration of this proposal. We look forward to the implementation of this project.

Very truly yours,

Jill C. Bicknell, P.E.
Assistant Program Manager, SCVURPPP



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San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Valley Water

March 1, 2022

Attn: Tory Vizenor
Department of Pesticide Regulation (DPR)
Pest Management and Licensing
1001 I Street, 3rd Floor
Sacramento, CA 95812-4015

Dear Ms. Vizenor:

I am writing on behalf of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) in support of the *Pesticide-free Sunnyvale: Live, Learn and Play the Less Toxic Way* project submitted to DPR for the 2022 Alliance Grants Programs by City of Sunnyvale. SCVURPPP is a consortium of fifteen municipal agencies in Santa Clara Valley that share a common National Pollutant Discharge Elimination System (NPDES) permit to discharge storm water to South San Francisco Bay. SCVURPPP helps its member agencies implement regulatory, monitoring and outreach measures for improving the water quality of the creeks of the Santa Clara Valley and the South San Francisco Bay.

SCVURPPP will participate on the *Pesticide-free Sunnyvale: Live, Learn and Play the Less Toxic Way* project management team and collaborate with the City of Sunnyvale to implement this project. The proposed project will assess pesticide-free maintenance practices at a well-visited park in Sunnyvale to determine their effectiveness, increase community awareness, and evaluate the impact to City operations. It will also establish a robust Integrated Pest Management (IPM) community engagement plan with strong partnerships and expand the City's current IPM policy practices to inspire wider adoption in the community. The goal of the project is to expand the adoption of effective and proven IPM practices, which reduces risks to public health and the environment in urban settings. The City of Sunnyvale has an IPM Policy that is implemented successfully at City properties. The Sunnyvale Sustainability Commission and the City Council have prioritized the need for further advancing IPM efforts to expand them to the community.

SCVURPPP's NPDES permit requires its agencies to implement measures to prevent urban runoff pollution caused by pesticides. SCVURPPP implements numerous education and outreach activities to increase the awareness of Santa Clara Valley residents on less-toxic methods of pest control, including media advertising, point-of-purchase outreach, implementation of the Santa Clara Valley Green Gardener Training Program, and maintenance of the www.MyWatershedWatch.org public outreach website. The proposed project aligns well with SCVURPPP's goal of preventing pesticide pollution of local creeks and the San Francisco Bay. As Alliance Team members on the *Pesticide-free Sunnyvale: Live, Learn and Play the Less Toxic Way* project, SCVURPPP staff will attend meetings and provide input for developing outreach and training materials.

SCVURPPP supports the efforts of City of Sunnyvale to explore pesticide-free park maintenance practices, expand community awareness and engagement, and serve as a model for wide-spread adoption of less-toxic IPM practices. Thank you for your thoughtful consideration of this proposal.

Very truly yours,

A handwritten signature in cursive script that reads "Jill C. Bicknell".

Jill C. Bicknell, P.E.
Assistant Program Manager



California Stormwater Quality Association[®]

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

March 7, 2022

State Water Resources Control Board – Division of Water Quality
Attention: Chris Beegan
1001 I Street, 15th floor, Sacramento, CA 95814
STORMS@waterboards.ca.gov

Subject: CEQA SCOPING COMMENT

Dear Mr. Beegan:

The California Stormwater Quality Association (CASQA)¹ appreciates the opportunity to provide comments on the CEQA Scoping document for the Proposed Water Quality Control Policy to Support the Development of Site-Specific Water Quality Objectives for Copper and Zinc in Fresh Waterbodies of California Using the Biotic Ligand Model (BLM Policy). CASQA supports the development of the BLM Policy and the State Water Resources Control Board's (State Water Board) efforts to update water quality objectives to reflect the latest scientific information.

As noted in the CEQA scoping meeting, copper and zinc 303(d) listings and Total Maximum Daily Loads (TMDLs) exist throughout California. The TMDLs and listings drive implementation of control measures for stormwater permittees to comply with permit limitations. Adopted copper site-specific objectives using water effects ratios and initial calculations using the BLM where data are available indicate that California Toxics Rule (CTR) water quality objectives for copper and zinc may be overprotective for many waterbodies. The BLM Policy will help develop scientifically defensible site-specific water quality objectives that protect aquatic life beneficial uses without requiring municipalities to construct unnecessary stormwater control measures that will divert their limited funds from other high priority environmental projects and programs.

CASQA supports the BLM Policy development and other efforts by the State Water Board to update water quality objectives and help stormwater permittees focus resources on constituents that are most likely to impact beneficial uses. To that end, our comments recommend analysis of additional alternatives beyond those presented at the CEQA scoping meeting. The recommended alternatives will support sustainable stormwater management and avoid environmental impacts from construction of control measures that are not needed to protect aquatic life beneficial uses.

¹ CASQA is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With approximately 2,000 members, 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.

COMMENT #1: EVALUATE THE ADOPTION OF A STATEWIDE OBJECTIVE WITH IMPLEMENTATION GUIDANCE

We understand that the proposed project will guide Regional Water Boards in the development of site-specific objectives for copper and zinc using the BLM. As an alternative, CASQA requests that the State Water Board evaluate adopting a statewide objective in lieu of requiring Regional Water Boards to develop site-specific objectives.

While the BLM Policy will likely streamline development of site-specific objectives, gathering data necessary to calculate the objective combined with the Basin Plan Amendment process will result in a delay of several years before revised objectives based on the BLM Policy are effective. During that time, stormwater permittees will be required by their permits to move forward with implementation of actions that may not be necessary once the site-specific objectives are effective. In some cases, these control measures are significant construction projects that have the potential for environmental impacts. These environmental impacts may be avoided if the Statewide process could establish the objective and the site-specific implementation of the objective would be done by the Regional Water Boards without the need for a Basin Planning action.

For example, one option would be to adopt the BLM as the objective and calculate the instantaneous water quality criterion (IWQC) for each copper or zinc sample for which the BLM input parameters are also collected. This approach would be similar to the calculation of CTR criteria for copper and zinc using hardness concentrations collected at the same time as the copper or zinc sample. The proposed alternative is also consistent with the approach that other states (e.g., Delaware, Oregon, Kansas) have used in adopting the 2007 United States Environmental Protection Agency (USEPA) Recommended Copper Criteria.

CASQA Recommendation:

- *Consider alternatives for the project that do not require adoption of site-specific objectives by each Regional Water Board.*

COMMENT #2: EVALUATE AN ALTERNATIVE THAT INCLUDES THE BOTH THE FRESHWATER AND SALTWATER BLM

The proposed project is limited to using the BLM that has been developed for freshwater. USEPA developed draft saltwater copper criteria based on the saltwater BLM in 2016. Although USEPA has not finalized the saltwater copper criteria, a saltwater BLM is available for both copper and zinc from Windward Environmental along with the freshwater BLM model for those constituents.

The CTR copper and zinc criteria require that all waterbodies that have salinity between 1 and 10 parts per thousand more than 95% of the time use the more stringent of the freshwater and saltwater criteria. For both copper and zinc, the saltwater criteria are more stringent than the freshwater criteria and therefore apply to many brackish waterbodies. Like the freshwater criteria, site-specific objectives and calculation of revised criteria using the available saltwater BLM indicate that the CTR criteria may be overprotective in some waterbodies. Only including the freshwater BLM in the Policy could result in unneeded control measures being implemented to address brackish and saltwater waterbodies. This could result in environmental impacts diversion of funds from other high priority environmental projects and programs that could have been avoided if the saltwater BLM were to be included in the policy.

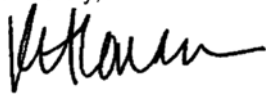
CASQA Recommendation:

- *Include evaluation of an alternative that includes the saltwater copper and zinc BLM in addition to the freshwater BLM*

CEQA Scoping Comments on BLM Policy

Thank you again for the opportunity to comment on the BLM Policy. If you have any questions, please contact CASQA Executive Director Karen Cowan at (310) 462-4939.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Cowan', with a long horizontal flourish extending to the right.

Karen Cowan, Executive Director
California Stormwater Quality Association

cc: Amanda Magee, State Water Board
CASQA Board of Directors
CASQA Executive Program Committee
CASQA Monitoring and Science Subcommittee
CASQA Policy and Permitting Subcommittee



San Francisco Bay Regional Water Quality Control Board

March 7, 2022

Sent via email to:

Jim Scanlin (jims@acpwa.org), Alameda Countywide Clean Water Program
Beth Baldwin (bethb@acpwa.org), Alameda Countywide Clean Water Program
Karin Graves (karin.graves@pw.cccounty.us), Contra Costa Clean Water Program
Mitch Avalon (mitch.avalon@pw.cccounty.us), Contra Costa Clean Water Program
Adam Olivieri (awo@eoainc.com), Santa Clara Valley Urban Runoff Pollution Prevention Program
Reid Bogert (rbogert@smcgov.org), San Mateo Countywide Water Pollution Prevention Program
Emily Corwin (ecorwin@fssd.com), Fairfield-Suisun Urban Runoff Management Program
Jennifer Harrington (jharrington@vallejewastewater.org), Vallejo Flood and Wastewater District

Subject: Approval of Source Control Load Reduction Accounting for Reasonable Assurance Analysis required by Municipal Regional Stormwater NPDES Permit (MRP, Order No. R2-2015-0049, NPDES Permit No. CAS612008) Provisions C.11.b.iii(3) and C.12.b.iii(3)

Municipal Regional Stormwater Permittees have prepared a report to address the requirements of MRP 2.0 Provisions C.11.b.iii.(3) and C.12.b.iii.(3), which require the Permittees to submit, for Executive Officer approval, refinements to the Interim Accounting Methodology¹ to assess mercury and PCBs load reductions in the next permit term (i.e., MRP 3.0). Water Board staff has reviewed the subject document submitted by Permittees on January 21, 2022. Based on this review, we are satisfied with the soundness of the described assessment methodologies and data collection programs to quantify mercury and PCBs loads reduced through implementation of pollution prevention, source control, and treatment control measures, including mercury source control, stormwater treatment, and other measures. Accordingly, I approve these methodologies and data collection programs.

Sincerely,

Thomas Mumley
Interim Executive Officer

ECM# 753641

¹ Permittees prepared a report, Interim Accounting Methodology for TMDL Loads Reduced, approved by the Water Board Executive Officer for use from January 1, 2016 through June 30, 2022.