

MANAGEMENT COMMITTEE INFORMATION PACKET



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 José • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Valley Water

February 20, 2025 Meeting

MATERIALS FOR INFORMATION

II. February 20, 2025 Agenda

III. January 16, 2025 Meeting Minutes

IV. January 16, 2025 Action Items

VIII. MRP Implementation

1. Memorandum to Management Committee, from Program Staff, re: Management Committee Briefing on Priority Items, February 2025.
2. Highlights of BAMSC Committee and Subcommittee Meetings, January – February 2025.
3. CASQA Seminar Series - State of the Union: California Stormwater, Meeting Summary, January 23, 2025.
4. C3PO Ad Hoc Task Group Meeting Summary, January 27, 2025.
5. Information Management Ad Hoc Task Group Meeting Summary, February 6, 2025.
6. State Water Resources Control Board's Stormwater Infiltration Policy Webinar Summary, February 6, 2025.

Other Items

1. Letter to Eric Dubinsky, United States Environmental Protection Agency, from Karen Cowan, Executive Director, CASQA, re: Comment Letter – USEPA Partial Approval/ Partial Disapproval of the 2024 California Integrated Report, January 15, 2025.
2. Letter to Janis Cooke, Regional Water Quality Control Board, from Karen Cowan, Executive Director, CASQA, re: Comment Letter – A Technical Foundation for Biointegrity and Eutrophication Indicators and Thresholds for Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor (Technical Report 1367), January 30, 2025.
3. MC Calendar, February – April 2025.



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AGENDA

MANAGEMENT COMMITTEE MEETING

February 20, 2025, 9:30 am – 11:00 am

Zoom Meeting¹

- 9:30** **I. Management Committee Meeting Call to Order/Introductions**
- II. Additions or Revisions to Agenda; Announcements**
- III. Approval of Minutes (January 16, 2025 meeting)**
- IV. Review of Action Items from Last Meeting**
- 9:40** **V. Time Open for Public Comment on Any Subject Not on Agenda (2 minutes)**
- 9:45** **VI. Regional Water Board Staff Comments**
- VII. Program Business**
- 9:55** **A. Program Management**
1. **Action Item:** FY 24-25 Annual Report Format – *request for approval.*
2. **Action Item:** GIS Data Sharing Agreement with Davey Resource Group for use of data on land use and GSI opportunity locations to support development of the Santa Clara County Urban Forestry Master Plan – *request for approval.*
- 10:10** **B. Program Budget**
1. **Action Item:** Final FY 2025-26 Program Budget – *status update and next steps.*
- 10:15** **C. Program Manager’s Report**
1. BAMS Collaborative Update – *information.*
2. CASQA Update – *information.*
3. Grants Update – *information.*

¹ *This Management Committee meeting is being conducted via Zoom. Please contact Program staff via email at jcbicknell@eoainc.com if you would like to attend the meeting via Zoom.

VIII. MRP Implementation

10:30 A. New Development and Redevelopment

1. Priority Items Identified by Program Staff
 - a. Green Stormwater Infrastructure Work Plan Tasks - *status report*
 - b. Regional Projects – *status report*

10:35 B. Trash Controls & Unsheltered Homeless

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

10:40 C. Monitoring / Pollutants of Concern

1. Priority Items Identified by Program Staff
 - a. Monitoring Planning and Implementation Tasks – *status report*
 - b. Regional Projects – *status report*
2. Management Committee Requested Items

10:45 D. Outreach Activities

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

10:50 E. Other Permit-Related Activities

1. Priority Items Identified by Program Staff
 - a. Cost Reporting – *status report*
2. Management Committee Requested Items
 - a. Program Information Management Systems – *status report*

10:55 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.*
4. Planned Agenda Items for Future MC Meetings – *update.*

11:00 X. Adjourn



**Santa Clara Valley
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**MANAGEMENT COMMITTEE MEETING
MINUTES**

January 16, 2025

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

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

There were no changes to the agenda. The following announcements were made:

- Aidan Cecchetti (Water Board) introduced himself as the new SCVURPPP contact at the Regional Water Board.
- Program staff submitted a letter to USEPA on USEPA's Partial Disapproval of the 2024 California Integrated Report and its addition of San Francisco Bay Region receiving waters to the Clean Water Act Section 303(d) List.
- The County of Santa Clara is developing an Urban Forestry Master Plan and is interested in data that SCVURPPP can provide to inform the Plan. Program staff is discussing the data needs with County staff and their consultant and will keep the MC posted.
- Jill Bicknell (Program staff) will provide an update on the status of Green Stormwater Infrastructure (GSI) implementation in Santa Clara County at Valley Water's Environmental and Water Resources Committee on January 27, 2025.

III. APPROVAL OF MINUTES

Motion: Ursula Syrova (Cupertino) moved to approve the minutes of the December 19, 2024 MC meeting. **Second:** Sheila Tucker (WVSWA). **Vote.** Motion passed unanimously.

IV. REVIEW OF ACTION ITEMS FROM LAST MEETING

Action Items from the November 21 and December 2, 2024 Budget AHTG Meetings:

- Action Item 12-24-1 (Discuss Budget AHTG concerns on the RMP Fee increase being held at 3% with other MC POTW agencies (San Jose and Palo Alto) and report back to the AHTG and MC.) is in progress. Chris Sommers (Program staff) has reached out to MC POTW agency staff to discuss the RMP Fee.
- Action item 12-24-2 (Prepare a Draft Information Management Work Plan in the second half of FY 2024-25 for review by the Information Management AHTG.) is in progress. The Work Plan will be distributed in February.
- Action item 12-24-3 (Set up an internal meeting later this FY to discuss proposed changes to the format of MRP reissuance meetings.) is in progress. The topic will be raised at the next Program Manager/Water Board (WB) staff quarterly meeting, to be scheduled in March.
- Action item 12-24-4 (Revisit the Regulatory Tracking Spreadsheet that was formerly prepared for the MC and consider adding legislative tracking of high priority items) is in progress. The tracking sheet will highlight key items from CASQA's legislative tracking table.

- Action item 12-24-5 (Discuss the appropriate content and forum for illicit discharge response training and bring back a recommendation to the Budget AHTG and MC.) is in progress. The topic will also be raised at the next Program Manager/WB staff quarterly meeting, to be scheduled in March.
- Action item 12-24-6 (Work with the PIP consultant and the WEO AHTG to evaluate the necessary updates to Watershed Watch event displays and materials.) is in progress. Program staff has discussed the display with the PIP consultant, and it will be further discussed at the next WEO AHTG meeting.
- Action item 12-24-7 (Prepare a proposed watershed stewardship collaboration work plan for FY 2024-25 and 2025-26 and convene a special meeting to discuss the approach.)

Action Items from the December 19, 2024 MC meeting:

- Action Item 12-24-8 (Send the Stormwater Credit Think Tank presentation, white paper, and other documents to the MC.) is complete. The information was sent to the MC on January 15, 2025.

Action Items from previous MC meetings:

- Action Item 11-24-1 (Send a link to the Stormwater Forum presentations to the MC when available) is in progress. The link will be sent to the MC the week of February 17th.
- Action Item 9-24-1 (Form an Unsheltered Homeless Populations AHTG to coordinate on Best Management Practices (BMPs) implemented by Co-permittees and development of encampment maps) is in progress. An invitation to join the AHTG was sent to the MC on December 10, 2024.
- Action Item 7-24-3 (Invite Ken Schiff (SCCWRP) to make a presentation on the San Diego bacteria study) is in progress. Ken has been contacted and Chris Sommers (Program staff) will send out a meeting poll to the MC to select a date and time.
- Action Item 12-23-7 (Convene and support a Pesticide Controls AHTG during FY 2024-25) is in progress. An invitation to join the AHTG was sent to the MC on December 10, 2024.

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

None.

VI. WATER BOARD STAFF COMMENTS

Aidan provided the following updates:

- WB staff is reviewing FY 2023-24 Permittee Annual Reports. General feedback will be sent to Countywide Program Managers and specific feedback directly to individual Permittees. Jill asked Aidan to provide guidance on the follow-up required by Permittees; specifically, the process for resubmitting the Annual Report sections, if required.
- WB staff is internally discussing the MRP 4.0 issuance and engagement timeline.
- WB staff would like to engage with Permittees on the illicit discharge response training. Their main goal is to ensure that Provision C.5 requirements are being met when responding to IDDE incidents.

Sheila Tucker (WVSWA) asked about discussions with WB staff about meeting the 100% trash reduction goal. Chris said that a meeting is being held on January 21, 2025 to discuss this issue.

VII. PROGRAM BUSINESS

A. PROGRAM MANAGEMENT

No items.

B. PROGRAM BUDGET

1. Action Item: Final FY 2025-26 Program Budget

Chris provided an overview of the FY 2025-26 Program Budget development process. The final draft FY 2025-26 Program Budget Packet was sent to the MC on January 6, 2025.

Motion: Pam Boyle Rodriguez (Palo Alto) moved to approve the FY 2025-26 Program Budget. **Second:** Colleen Trostle (Santa Clara). **Vote:** Motion passed with one abstention from the City of Sunnyvale.

2. Action Item: SCVURPPP FY 2023-24 Budget Evaluation and Use of Unspent Funds

Chris provided an overview of the FY 2023-24 budget reconciliation memorandum with recommendations for using FY 2023-24 carryover funds. The memorandum includes a new task for funding a portion of the *Greening Facilities for a Sustainable Community* project. The project is being funded via a grant from the USEPA to the City of Palo Alto. Due to USEPA's contracting requirements, the SCVURPPP fiscal agent recommends that the MC use carryover funds to fund the tasks assigned to the Program Manager. The requested budget for FY 2024-25 is \$21,000.

Chris added that an additional document that outlines the potential invoiced/assessed amounts based on three contingency/reserve scenarios (i.e., 8%, 9%, and 10% of operating budget) was also distributed to the MC. This document was created in response to a request to evaluate the appropriate level of contingency/reserve for FY 2025-26. The MC discussed the contingency/reserve scenarios and agreed to keep the contingency at 10% (the maximum allowed per SCVURPPP Bylaws) for FY 2025-26.

Motion: Sheila Tucker (WVSWA) moved to approve the SCVURPPP FY 2023-24 budget reconciliation memorandum, including the funding request for the *Greening Facilities for a Sustainable Community* project and a 10% contingency reserve. **Second:** Pam Boyle Rodriguez (Palo Alto). **Vote:** Motion passed with one abstention from the City of Sunnyvale.

C. PROGRAM MANAGER'S REPORT

1. BAMS Collaborative Update

Chris provided the following updates:

- The BAMSC Steering Committee will consider approving the project profiles for potential projects of regional benefit at its January meeting.
- BAMSC representatives will meet with WB staff on January 21, 2025 to discuss the 100% trash reduction goal. Staff from Mountain View, Sunnyvale,

and the County will attend the meeting. Other MC members interested in attending should inform Chris.

- The second draft FY 2024-25 Annual Report forms will be sent to the MC next week for a final review. The MC will be asked to approve them at the February MC meeting.

2. CASQA Update

The next CASQA Quarterly Seminar is scheduled for January 23, 2025. This will be the CASQA Annual State of the Union seminar featuring State and Federal regulatory updates and legislation.

The State Water Board will consider adoption of the Final Draft Proposed Municipal Stormwater Cost Policy and Staff Report at its January 22, 2025 Board meeting. Comments are no longer being accepted. CASQA will provide testimony at the adoption hearing.

The State Water Board is developing an Urban Stormwater Infiltration Water Quality Control Policy. Workshops providing information on the development process will be held on February 3 and 6, 2025. The informal public comment period closes February 24, 2025. Program staff will attend and make a recommendation as to whether SCVURPPP should submit comments.

3. Grants Update

USEPA Region 9 has officially awarded the City of San Pablo \$8,000,000 for the PCBs TMDL Special Studies and Implementation Project. The City can now move forward on this grant-funded project and will soon issue an RFP to select a consultant team for project implementation.

EPA is holding a webinar on January 30, 2025 to provide a detailed review of the Bipartisan Infrastructure Law (BIL) FY 2025 San Francisco Bay Water Quality Improvement Fund (SFBWQIF) Notice of Funding Opportunity (NOFO). This funding opportunity is intended to support building climate resilience in the Bay Area's underserved communities.

VIII. MRP IMPLEMENTATION

A. NEW DEVELOPMENT AND REDEVELOPMENT

The FY 2024-25 SCVURPPP C.3 workshop is scheduled for April 29, 2025. It will be held in-person at the Campbell Community Center. Program staff updated the GSI details in Part 2 of the GSI Handbook. The revised details were sent to the C3PO AHTG for review.

Sheila reported that the City of Campbell held a study session on GSI for the City Council. The biggest concern was O&M costs. The O&M cost for the Hacienda Avenue Green Street facility is \$100,000/year, which includes \$65,000/year for irrigation.

B. TRASH CONTROLS AND UNSHELTERED HOMELESS

The next Trash AHTG meeting will be held on February 4, 2024. Program staff is updating the Trash Dashboard monthly.

C. MONITORING / POLLUTANTS OF CONCERN

Both trash outfall and receiving water trash monitoring have started for Water Year 2025. LID monitoring is ongoing. Program staff has started developing the FY 2024-25 Urban Creeks Monitoring Report, which will be available for Co-permittee review in early February.

D. OUTREACH ACTIVITIES

Program staff is working with the Scripts Review Work Group to finalize the Youth Outreach Campaign concepts.

E. OTHER PERMIT-RELATED ACTIVITIES**1. Cost Reporting**

Program staff will set up a Cost Reporting Work Group meeting in February to respond to Co-permittee questions on cost reporting.

2. Information Management

The next SCVURPPP Information Management AHTG meeting will be held on February 6, 2025.

IX. OTHER BUSINESS

The March MC meeting will be a hybrid format, i.e., held in-person at Sunnyvale City Hall and via Zoom.

X. ADJOURN

The MC meeting adjourned at 11:00 am.



**Santa Clara Valley
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Meeting Attendance Record

DATE January 16, 2025

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

CO-PERMITTEE REPRESENTATIVES
(voting members)

SIGNATURE

Ursula Syrova – Cupertino
Alternate: TBD

Ursula Syrova

Harun Musaefendic – Los Altos
Alternate: Vency Woo

Harun Musaefendic

WooJae Kim – Los Altos Hills
Alternate: John Chau

-

Elaine Marshall – Milpitas
Alternate: Roberto Alonzo

Elaine Marshall

Carrie Sandahl – Mountain View
Alternate: Brian T. Jones

Brian T. Jones

Karin North – Palo Alto
Alternate: Pamela Boyle Rodriguez
Alternate: Michel Jeremias

Pam Boyle Rodriguez

Rajani Nair – San Jose
Alternate: Mary Morse

Rajani Nair

Colleen Trostle – Santa Clara
Alternate: Dave Staub

Colleen Trostle

Winola Cheong – Sunnyvale
Alternate: Emma Hinojosa

Winola Cheong, Emma Hinojosa

Vanessa Marcadejas – Santa Clara County
Alternate: Zhenzhen Jiang

Vanessa Marcadejas

John Bourgeois - SCVWD
Alternate: James Downing

John Bourgeois, James Downing

Sheila Tucker – West Valley Communities
(Campbell, Los Gatos, Monte Sereno, and Saratoga)

Sheila Tucker

URBAN RUNOFF PROGRAM STAFF

Adam Olivieri

Adam Olivieri

Jill Bicknell

Jill Bicknell

Chris Sommers

Chris Sommers

Vishakha Atre

Vishakha Atre

**INTERESTED PARTIES/AGENCY
REPRESENTATIVE**

Trish Mulvey – Clean South Bay

- _____

ADDITIONAL ATTENDEES

Aidan Cecchetti, SF Bay Regional Water Board

Bryn Evans, Craftwater

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

Action Items from January 16, 2025 MC Meeting

Action	Description	Responsibility	Due Date	Status	Comments
None					

Action Items from November 21 and December 2, 2024 Budget AHTG Meetings

Action	Description	Responsibility	Due Date	Status	Comments
12-24-1	Discuss Budget AHTG concerns on the RMP Fee increase being held at 3% with other MC POTW agencies (San Jose and Palo Alto) and report back to the AHTG and MC.	Program staff	February	To be done	
12-24-2	Prepare a Draft Information Management Work Plan in the second half of FY 2024-25 for review by the Information Management AHTG.	Program staff	February	In progress	Presentation on proposed framework and tasks made to AHTG on February 6 th
12-24-3	Set up an internal meeting later this FY to discuss proposed changes to the format of MRP reissuance meetings.	Program staff	March	To be done	
12-24-4	Revisit the Regulatory Tracking Spreadsheet that was formerly prepared for the MC and consider adding legislative tracking of high priority items.	Program staff	February	To be done	
12-24-5	Discuss the appropriate content and forum for illicit discharge response training and bring back a recommendation to the Budget AHTG and MC.	Program staff	February	To be done	
12-24-6	Work with the PIP consultant and the WEO AHTG to evaluate the necessary updates to Watershed Watch event displays and materials.	Program staff	February	In progress	Will be discussed at the WEO AHTG meeting on March 6, 2025
12-24-7	Prepare a proposed watershed stewardship collaboration work plan for FY 2024-25 and 2025-26 and convene a special meeting to discuss the approach.	Program staff	February	In progress	

Action Items Remaining from Previous MC Meetings

Action	Description	Responsibility	Due Date	Status	Comments
11-24-1	Send a link to the Stormwater Forum presentations to the MC when available.	Program staff	February	In progress	
8-24-1	Form an Unsheltered Homeless Populations AHTG to coordinate on BMPs implemented by Co-permittees and development of encampment maps.	Program staff	January	Done	First meeting will be held on February 26, 2025.
7-24-3	Invite Ken Schiff (SCCWRP) to make a presentation on the San Diego bacteria study to a small work group of Co-permittees that are subject to MRP Provision C.14.	Program staff	TBD	In progress	Will send meeting poll to MC.
12-23-7	Convene and support a Pesticide Controls AHTG during FY 2024-25.	Program staff	January	Done	First meeting will be held on February 19, 2025.



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TO: Management Committee

FROM: Program Staff

DATE: February 14, 2025

SUBJECT: Management Committee (MC) Briefing on Priority Items

Program Management

- * **FY 2025-26 Program Budget** - The Final Draft FY 2025-26 Budget was approved by the MC at its January 16th meeting. Program staff are beginning to develop the Draft FY 2025-26 Program Work Plan, which will be sent to the MC in early March for review. Approval of the Work Plan will be requested at the March 20th MC meeting.
- * **Final Draft FY 2024-25 Annual Report Forms** - The Revised Draft FY 2024-25 Annual Report Forms developed by the Regional BAMSC Work Group were provided for MC review on January 29th. Comments are due by February 14th. Program staff were part of the Regional Work Group and made sure that SCVURPPP comments on the first draft were incorporated. The MC will be asked to approve the Annual Report Forms at the February 20th MC meeting. The Forms will then go to the BAMSC Steering Committee for approval at its February 27th meeting and be submitted to the Regional Water Board by March 3, 2025 (the March 1st deadline is a Saturday).
- * **SWRP GIS Data Sharing Agreement** – The Santa Clara County Office of Sustainability and Resilience is developing an Urban Forestry Master Plan for the County, assisted by their consultant Davey Resource Group (DRG). As part of this effort, DRG has requested GIS data used to develop the Santa Clara Basin Stormwater Resource Plan (SWRP), specifically land use data and the locations and priorities of LID, Green Street and Regional GSI project opportunities. The MC will have the opportunity to ask questions and asked to approve a data sharing agreement between DRG and EOA (on behalf of SCVURPPP) at the February 20th MC meeting.
- **State Cost Reporting Policy** – In December 2024, the State Water Board released the proposed [Final Draft Water Quality Control Policy for Standardized Cost Reporting in Municipal Stormwater Permits](#) along with the [Final Draft Staff Report](#) and [Response to Comments](#). The Cost Reporting Policy was adopted as final at the January 22, 2025 State Water Board meeting. Section 13383 Orders will likely be issued to MRP Permittees, requiring duplicate cost

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

reporting to the State and Regional Boards in FY 2026-27. The Bay Area Cost Reporting Framework will be updated, via a project of regional benefit, to assist MRP Permittees in translating costs to the State's cost categories and line items.

- Internal SCVURPPP Share Drive/Folder – Program staff have created an internal Share Drive/Folder for the MC, Budget AHTG, and all SCVURPPP AHTGs. The drive/folder is accessible by all MC and AHTG members and contains materials/documents associated with each group. The AHTG Status Table is also posted on the Program's share drive/folder. Please contact Program staff for the link.

Municipal Operations (C.2)

- Municipal Operations AHTG - The AHTG last met on September 11th at Sunnyvale City Hall Sycamore Conference Room. Program staff emailed a save the date flyer advertising the SCVURPPP Rural Roads Workshop on March 6th, 9:00 – 11:30am, at the Valley Water Board Room, 5750 Almaden Expressway, San Jose. There will be a hybrid option to join via Zoom. Program staff emailed the registration flyer and more details on the workshop on February 6th.

New Development and Redevelopment (C.3)

- Stormwater Treatment Measure (STM) Data Portal – Program staff have received data on projects completed in FY 2023-24 from most Co-permittees and are now working individually with Co-permittees to resolve data inconsistencies and upload the data to the STM Data Portal.
- GSI Handbook Update – Program staff are continuing to prepare updates to this Handbook to include MRP 3 requirements and other needed changes. Program staff have completed updating the GSI details in Part 2 of the Handbook. The revised details were sent out to the C3PO AHTG for review on January 6th and comments are due on February 14th.
- C.3/GSI Workshop – The C.3/GSI Workshop will be held on April 29, 2025. It will be an in-person workshop held at the Campbell Community Center. The registration flyer was distributed to the C3PO AHTG.
- C3PO AHTG – The next C3PO AHTG meeting is scheduled for March 24, 2025.

Industrial/Commercial Business Inspection/Illicit Discharge Detection/Elimination (C.4/C.5)

- IND/IDDE AHTG – The AHTG last met on December 19th. Program staff emailed the Scripts Work Group the tallow bin BMP fact sheet for review. After comments are received, Program staff will provide the revised fact sheet to the AHTG for review before finalizing. Program staff also emailed a draft letter that will transmit the mobile business fact sheet to mobile businesses in the countywide inventory to the AHTG for review. Comments were due February 7th.

Program staff emailed a draft MS4 Map Update Plan and Schedule Template for review and comment by January 13th. Program staff are reviewing comments received. In addition, Program staff shared example Co-Permittee C.5 phone trees/flow charts/contact lists with the AHTG via the SCVURPPP Sharepoint IND/IDDE AHTG folder.

- C.15.b.iii Emergency Firefighting Discharges – Updates on the Regional Firefighting Discharges Work Group to address Provision C.15.b.iii requirements are provided at the IND/IDDE AHTG meetings. The item is first on the agenda in case there are interested parties that do not need to attend the full AHTG meeting. Program staff emailed draft text for outreach materials required by C.15.b.iii to the AHTG for review. Program staff are reviewing comments received. The BAMSC Regional Firefighting Discharges Work Group met on January 14, 2025.

Construction Controls (C.6)

- Construction Inspection AHTG – The AHTG last met in September 2023. Program staff have updated the following BMP brochures in the SCVURPPP fact sheet format: Home Repair and Remodeling, General Construction and Site Supervision, and Fresh Concrete and Mortar Application. Program staff emailed the updated outreach materials to the AHTG for review. Comments are due February 18th. Program staff also forwarded QSD/P training opportunities in the area to the AHTG.

Watershed Education and Outreach (C.7)

- Watershed Watch Campaign – Program staff worked with Gigantic Idea Studio to develop the first video for the Youth Outreach Campaign. This video focuses on storm drain awareness and features Palo Alto storm drain maintenance staff. The video was finalized based on feedback from the Scripts Review Work Group. Program staff worked with Gigantic Idea Studio to develop the FY 24-25 Watershed Watch Campaign Mid-Year Report. It will be distributed to the WEO AHTG for review.
- Mid-Year Evaluation of the FY 24-25 School Assembly Program – Program staff summarized evaluations received from teachers that attended the ZunZun assemblies and prepared the Mid-Year Evaluation Report. It will be distributed to the WEO AHTG for review.
- Brochures – Program staff coordinated a print run of the You are the Solution brochures (in English, Spanish, and Vietnamese) and the Draining Pools and Spas brochures.
- WEO AHTG – The next WEO AHTG meeting is scheduled for March 6th.

Monitoring (C.8)

- Low Impact Development (LID) Monitoring – LID monitoring began at two locations in the City of San Jose during Water Year 2024, which began in October 2023. All equipment installations were completed in early October 2023 at the two bioretention units, identified as Treatment Control Measure (TCM) 4 and TCM6. Flow monitoring was ongoing throughout WY 2024, which ended on April 30th. Seven paired influent/effluent samples were collected during six storm/runoff events in WY 2024. In June, the monitoring subcontractor KEI removed all electronic equipment at the bioretention units in San Jose to protect the equipment from the summer heat. A summary of the status of LID monitoring during WY 2024 and the initial results will be reported to the Water Board in the Urban Creeks Monitoring Report (UCMR) that will be submitted on March 31, 2025.

Throughout 2024, Program staff met multiple times with Water Board staff and other Bay Area stormwater program representatives to discuss and finalize the required revisions that must be implemented in the LID Monitoring Plans. BAMSC developed a written response-to-comments document that incorporates the agreements reached with Water Board staff on proposed revisions to the Plans. The final response-to-comments document was submitted to the Water Board in May. At the July MPC meeting, Water Board staff said they would accept the proposed revisions to the LID Monitoring Plans and provide written confirmation soon. However, in a July 30th email to stormwater program representatives in the BAMSC, Water Board staff agreed to approve the proposed plan revisions but with one additional requirement added. The BAMSC Regional Monitoring Coalition (RMC) workgroup met with Water Board staff on August 20th and agreed to a revised proposal that included installation of monitoring wells within all unlined facilities to measure continuous water levels during the rainy season, and discontinuation of exfiltration tests and soil moisture monitoring. With these edits, Water Board staff agreed to approve the monitoring plans with all agreed-upon revisions for submittal by October 31st. Program staff submitted the revised LID Monitoring Plans with all agreed-upon revisions to the Water Board on October 31, 2024.

In preparation for WY 2025 monitoring, which started on October 1 2024, KEI re-installed the monitoring equipment at both sites during September and October. KEI successfully sampled at both TCM4 and TCM6 during the November 11th storm event. New equipment (piezometers) were installed at both sites after this first storm event, in late November and early December. These equipment will continuously monitor water depth within each facility throughout the storm season. Two additional storm events were successfully sampled at TCM6 in December.

The annual LID Monitoring Technical Advisory Group (TAG) meeting was held on April 19th. The meeting focused on updating the TAG on the outcomes of Year 1 monitoring to date, and discussion of Water Board staff proposed revisions to the LID monitoring plans that required TAG input. Planning for the next LID Monitoring TAG meeting will begin early in the new year. The date for this meeting is currently TBD, but will likely be in the late spring of 2025.

- Trash Monitoring –Trash outfall monitoring for Water Year (WY) 2025 began in October 2024. Trash nets have been deployed at all three sites during three storm events. Unfortunately, the nets at two of the sites during the third monitoring event opened and the samples were lost. A fourth event at the two sites will be completed prior to the end of the wet weather season. Trash receiving water monitoring has begun and samples have been collected during one event at the two sites in Santa Clara County. Additional samples are planned for collection during subsequent events this WY. Due to backordered equipment receiving water monitoring was delayed for WY 2025, but assuming that the equipment issue is addressed soon and qualifying storm events occur in February – April, the minimum number of MRP-required storm event monitoring for WY 2025 should be attainable.

Water Board staff comments on the revised outfall and receiving water trash monitoring plans were received in September 2025. BAMSC developed responses to these comments and submitted the responses to Regional Water Board staff in December 2025. Approval of both plans by the Water Board was received in January 2025.

Trash monitoring is being conducted in coordination with the Trash Technical Advisory Group (TAG), which last met in May 2024. The TAG will meet again on February 25, 2025 to provide input on a number of trash monitoring topics, including results to date for both outfall and receiving water monitoring.

- POCs Monitoring – Planning and implementation of WY 2025 POCs monitoring has begun, focused on the sites identified in the SCVURPPP Old Industrial Area Control Measure Plan and discussed with the POC AHTG. The Program anticipates collecting both stormwater and sediment samples at sites across the Santa Clara Valley. Program staff conducted field reconnaissance in early December and identified three potential stormwater sampling locations for WY 2025 monitoring. Sediment sampling is currently being planned for later in the year. Additional details on planned monitoring during WY 2025 will be discussed with the POC AHTG at their next meeting, which is scheduled for March 10, 2025 from 1 pm to 3 pm.
- Pesticide/Toxicity Monitoring – MRP 3.0 requires that the Program conduct wet weather and dry weather monitoring for pesticides and toxicity. SCVURPPP is working with BAMSC regional partners to successfully accomplish all wet weather pesticides and toxicity monitoring requirements. MRP 3.0 requires that a regional total of 10 wet weather samples be collected during the permit term. SCVURPPP is responsible for 3 of the 10 samples, which were successfully collected from Stevens Creek, San Tomas Aquino, and Guadalupe River during a storm in early November 2022. Wet weather pesticide and toxicity monitoring is now complete for the permit term, barring any resampling needed based on the results. Dry weather sampling occurred in July 2023. All results are currently being reviewed by Program staff and regional partners.
- Monitoring AHTG Meetings - The next Monitoring AHTG meeting is scheduled for March 4, 2025 from 1:30 pm to 3:30 pm to discuss the Draft Water Year 2024 Urban Creeks Monitoring Report (UCMR), which is due to the Water Board by March 31, 2025.

Pesticide Outreach (C.9)

- Santa Clara Valley Green Gardener Training – The Winter 2025 training was cancelled due to low enrollment.

Trash Controls (C.10)

- On-land Visual Trash Assessments (OVTAs) – Assessments for FY 2024-25 sites began in November 2024 and will continue through April 2025. OVTA results are being incorporated into the Program’s trash management dashboard on a monthly basis to allow Co-permittees to know how the OVTA results impact their progress toward the MRP’s 100% trash load reduction goal, which must be achieved in 2025.
- Long-term Trash Reduction Guidance – Subtasks being completed by Program staff as part of the Long-term Trash Reduction Guidance task in FY 2024-25, including the following: revisions to baseline trash generation maps, creation and updating ArcGIS Online (AGOL) trash generation maps, trash dashboard updates and maintenance, continued assistance with the private land drainage area (PLDA) trash control program, assistance in siting small (catch basin insert) types of full capture systems, and support for Co-permittees towards achieving the MRP mandated 100% trash load reduction goal. The status of each of these subtasks will be discussed at the next Trash AHTG meeting.
- Private Land Area Drainage Area (PLDA) Inspections – Program staff have identified all PLDAs that need to be inspected by Co-permittees, consistent with the MRP. The inventory is included in the trash dashboard. Co-permittees should provide Program staff with the results of their PLDA inspections to incorporate into the dashboard and assist with calculating trash load reductions.
- ★ Bioretention as Full Trash Capture (FTC) Systems – On September 30, 2022, SCVURPPP included a memo with our Annual Report, titled “Multi-benefit Bioretention Stormwater Treatment Facilities as Trash Full Capture Systems” (Memo). On April 10, 2023, Water Board staff provided MRP Program Managers with comments on the Memo. MRP Program Managers and Water Board staff held a follow-up meeting to discuss multi-benefit treatment systems as full trash capture on April 13, 2023. Permittees provided a written response to the Water Board staff comments in May 2024, and the issue was briefly discussed in Bay Area Municipal Stormwater Collaborative (BAMSC) meetings during summer 2024. In January 2025, Water Board staff distributed a letter to MRP Program Managers that provides additional comments on the Memo and guidance regarding how bioretention systems can be acceptable as full trash capture equivalent systems. Overall, Water Board staff agreed that bioretention systems can provide a full trash capture benefit when they are:
 - Appropriately designed to treat the design storm for full trash capture, taking into account potential ponding;
 - Appropriately designed to have robust vegetation to capture trash so it can be removed prior to discharging to the storm drain or blowing out of the system, and to avoid flow paths that can discharge trash, or they include a full trash capture device; and
 - Adaptively managed to ensure they are being inspected and maintained at a frequency sufficient to remove trash before it discharges to the storm drain or blows out of the system.

The Water Board staff letter goes on to provide guidance intended to inform how bioretention systems may be acceptable as full trash capture controls and states that Permittees who are claiming bioretention systems for full trash capture equivalence should evaluate them consistent with the guidance and:

- a) Provide, in their FY 2024-25 annual reports and, as appropriate, subsequent annual reports, supplemental information confirming that claimed bioretention systems are full

trash capture equivalent.

- b) Retrofit or otherwise modify practices around the claimed bioretention systems based on the evaluation of individual systems with respect to the guidance and subsequent discussion, sufficient to achieve full trash capture equivalence.
- c) Where bioretention systems do not achieve full trash capture equivalence, revise Section C.10.a.ii(a) of their Annual Report to remove claimed benefit and identify alternative measures.

The Water Board staff letter and guidance were discussed at the Trash AHTG on February 4th. Program staff are currently developing guidance for SCVURPPP Co-permittees based on the Water Board staff guidance and evaluation procedures and the input provided from the Trash AHTG. The SCVURPPP guidance will describe the proposed response from the Program to Water Board staff's letter/guidance and provide options to Co-permittees on accounting for bioretention as full trash capture systems in FY 2024/25 and during subsequent FYs. The guidance will be distributed to SCVURPPP Co-permittees in late February.

- Trash AHTG Meetings – The Trash AHTG typically meets on the 3rd Tuesday of the month. The last meeting was held on February 4th. The next meeting is scheduled for February 18th.
- Zero Litter Initiative (ZLI) – The ZLI Steering Committee meets approximately monthly via Zoom. The ZLI met on February 7th and discussed various existing and proposed local and state policies, existing and proposed laws, documents, news articles and updates on various litter-prone items, plastic pollution, stormwater and human health issues. The next meeting of the ZLI will be held on March 7, 2025.

Pollutants of Concern Controls (C.11/C.12)

- PCB/Hg Source Property/Area Identification Studies
 - **Work Plan** - Program staff continue to implement Source Property investigation activities and have developed a Source Investigation Work Plan to be fully consistent with MRP 3.0 provision C.11/12.b requirements, which are more focused on old industrial areas. The status of these activities was discussed at the POC AHTG meeting in July 2023. Program staff finalized the Work Plan to address Co-permittee comments. However, based on recent input from Water Board staff requesting Co-permittees increase the pace of investigations, Program staff is currently reviewing the Work Plan and the Old Industrial Area Control Measure Plan to determine the feasibility of increasing the pace of investigations in key areas. The Work Plan will be updated in the near future as needed, in coordination with the POC AHTG.
 - **Source ID Investigations** - As part of the proposed enhancements to the source investigation process, the Program developed a memo providing guidance on the development and implementation of a new program to collect on-site samples and identify and address properties with moderate or high PCBs. The memo was discussed with the POC AHTG meeting during summer 2023. The details of the new program were finalized based on input received and presented in the Final-Revised Old Industrial Area Control Measure Plan that was submitted to the Regional Water Board on March 28, 2024. Program staff continued working with individual Co-permittees to plan and implement source investigations during the remainder of FY 23-24, and have continued to conduct source investigations during FY 24-25, as described in the Source Investigation Work Plan. Program staff completed the first on-site investigations that included collection of sediment samples on private properties over three days (June 4-6) in the Cities of Sunnyvale and San José. On-site sediment samples were successfully collected at every property the Program and Co-permittee staff visited during these on-site inspections. The chemical analysis results for these samples are currently under review by Program staff and will be reported in the Urban

Creeks Monitoring Report (UCMR) that is due to the Water Board in March 2025. Program staff also held meetings and are currently planning follow-up meetings with specific Co-permittees to discuss the outcomes of ongoing source property investigations and potential referrals to the Water Board.

- **Source Property Referrals** - Program and City of Palo Alto Staff met with Water Board staff in November to discuss a potential PCBs source property referral and the proposed enhanced operation and maintenance (O&M) activities. Water Board staff approved the enhanced O&M Plan, and the City of Palo Alto submitted the source property referral to the Water Board in January 2024. Program and City of San José staff met with Water Board staff in April to discuss six potential source property referrals and proposed enhanced O&M activities. Water Board staff approved the enhanced O&M plans and agreed to accept the six source property referrals. The City of San José submitted these six referrals at the end of June 2024.
- Control Measures Plan for Old Industrial Land Use Areas and Areas with Moderate Levels of PCBs/Mercury - Program staff developed a Control Measures Plan, consistent with MRP 3.0 Provision C.11/12.c. The Plan was submitted to the Regional Water Board on March 30, 2023. WB staff sent a response letter to all five of the Bay Area Countywide Stormwater Programs on August 25, 2023 indicating the Control Measure Plans did not meet WB expectations. Program staff developed the Draft Revised Plan with review and comments from Co-permittees. The Final Revised Plan was approved by the MC in March. The Final Revised Plan was submitted to the Water Board on March 28, 2024.

Program staff received further comments from WB staff on the Control Measures Plan and presented a proposed strategy to address these comments at the POC AHTG meeting held on August 2nd. Co-permittees agreed with the proposed strategy and Program staff subsequently revised the Plan accordingly. The revised Plan was approved by the MC at their September 19th MC meeting and submitted to WB staff in late September. Water Board staff provided formal acceptance/approval of the revised Plan in a letter submitted to the Program Manager on October 10, 2024.
- 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 in FY 2024-25. Additional functionality may be added to the database as well during future phases to align with MRP 3.0 Asset Management requirements, as directed by the MC.
- Controlling PCBs from Bridges and Overpasses – The Program has been tracking the progress of the Caltrans specification to manage potential PCBs-containing material in bridge roadway expansion joints during bridge/overpass replacement or major repair. A draft SOP was sent out on September 11th, for public review and comment. Program staff reviewed the draft SOP and discussed with regional partners at the BAMSC Steering Committee meeting on September 26th about providing guidance to Permittees on implementation. Based on the review, BAMSC agreed to develop regional guidance for MRP Permittees on how best to address the MRP requirements, possibly using the Caltrans SOP. Program staff anticipate the draft guidance materials will be available for Co-permittee review and comment by the end of February. Program staff worked with Co-permittees to develop inventories of bridges within each Co-permittee’s jurisdiction. The bridge inventories were included as an appendix to the SCVURPPP Annual Report that was submitted to the WB on September 30, 2023.
- Controlling PCBs from Electrical Utilities – Over the summer of 2023, the Program led a regional workgroup to address requirements for municipal electrical utilities within the MRP area. The workgroup met twice (May 16th and June 8th) to discuss the requirements and develop the necessary products that were due with the 2023 Annual Reports. The Program worked directly with municipal utility staff from Silicon Valley Power (SVP) and the City of Palo

Alto Utilities (CPAU) to gather the data required for the SCVURPPP Annual Report. The Program produced a draft SOP for updating spill response and reporting for spills from municipal electrical utility equipment, which was reviewed by municipal utility staff across the Bay Area. The SOP was finalized per comments received and included as an appendix to the SCVURPPP Annual Report that was submitted to the WB on September 30, 2023.

Program staff facilitated a meeting of the BAMSC municipal utilities workgroup on June 4th to discuss new reporting requirements for the FY 2023-24 Annual Report. Program staff worked directly with municipal utility staff from SVP and CPAU to gather all required reporting data and to develop a summary of their plans to maintain and upgrade OFEE. The data and the plans were submitted with the Program's FY 23-24 Annual Report on September 30, 2024.

- 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. All required reporting data for FY 2023-24 on implementation of this Program was compiled by Program staff and was included in Appendix 11-1 of the SCVURPPP Annual Report that was submitted to the RWB on September 30, 2024. Co-permittees should continue to implement the established PCBs in demolition program in FY 2024-25, 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 Steering Committee last met in September 2024 and the TRC last met on December 12th. The Steering Committee will next meet in January and the TRC in March. In addition, Program staff serve as stormwater representatives on various RMP workgroups, including the Sources Pathways and Loadings Work Group (SPLWG), the PCBs Workgroup, and the Emerging Contaminants Work Group (ECWG).
- Pollutants of Concern AHTG Meetings - The POC AHTG last met on August 2nd to discuss the input received from RWB staff on the Old Industrial Area Control Measure Plan that was submitted in March 2024. The next POC AHTG meeting is scheduled for March 10, 2025 from 1 pm to 3 pm. An agenda and meeting materials will be sent out at least one week prior.

Water Utility (C.15)

- Water Utility AHTG – Program staff emailed the AHTG a reminder that the Annual Report for calendar year 2024, as required by the State Drinking Water System Discharges General Permit, is due March 1st.

Unsheltered Homeless Populations (C.17)

- Unsheltered Homeless Populations AHTG – The first meeting of this AHTG is scheduled for February 26, 2025, from 1:30 – 3:00 pm.

Cost Reporting (C.20)

- Cost Reporting Work Group - A Work Group meeting has been scheduled for February 20th, 1:00-2:30pm on Zoom, to respond to Co-permittee questions on cost reporting. Program staff have been compiling questions received to date into an FAQ document that will be shared with Co-permittees.

Information/Asset Management (C.21)

- Information Management AHTG – The AHTG meets monthly to assist Co-permittees with development and implementation of Asset Management Plans and to discuss broader information management efforts within SCVURPPP. At the February 6th meeting, the AHTG continued discussion of the condition assessment approach and plans to conduct condition assessment training for Co-permittees in March/April 2025. The AHTG also received a presentation by Program staff on current information management procedures for SCVURPPP data and files and recommended modifications that will be detailed in a SCVURPPP work plan for FYs 2024-25 and 2025-26. The next Information Management AHTG meeting will be held on March 6, 2025.



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Highlights of Bay Area Municipal Stormwater (BAMS) Collaborative Steering Committee, Subcommittee and Work Group Meetings January - February 2025

Steering Committee – January 29, 2025

Co-Chairs – Rinta Perkins (CCCWP) and Reid Bogart (SMCWPPP)
SCVURPPP representatives – Jill Bicknell and Kristin Kerr (Program staff)

Internal Meeting

- The Steering Committee approved the draft project profiles for projects of regional benefit for FY 2025-26.
- The Committee continued discussion of USEPA’s disbursement of 2024 Federal Funding for SF Bay (approximately \$50 million) through non-competitive grants. USEPA Region 9 has approved the non-competitive exception request for \$8M funding submitted by the City of San Pablo (City) on behalf of the Bay Area Municipal Stormwater Collaborative (BAMSC) to fund regional PCBs TMDL studies and projects. Funding through the grant will offset a portion of the costs associated with MRP Provision C.8 and C.12 compliance. The City of San Pablo has agreed to be the fiscal agent for the grant project. The City Council approved acceptance of the grant award and the City signed the agreement with USEPA. (They have not heard what the impact will be of the recent Executive Order to pause Federal funding.) One of the first steps will be to procure consultant assistance via an RFP process. Countywide Programs have been requested to provide a representative to serve on the consultant selection panel. James Downing, Valley Water, will participate on the panel for SCVURPPP.
- An update on the Watching Our Watersheds (WOW) project was provided. The Project Team finalized the litter outreach work plan and is looking for representatives from each countywide program to participate in the campaign. The work plan for development of a streamlined OVTA analysis has been finalized, and initial sampling for receiving water trash monitoring is being conducted this winter. The next Project Management Team (PMT) meeting will be in February.
- An update on the Alternative Trash Outfall Monitoring Methods Project was provided. Three alternative methods are being reviewed: 1) in-pipe sampling; 2) collection of trash at deposition point of outfall; and 3) AI approach to review imagery to quantify what is coming out of outfalls. Once the literature review is completed, the methods will be discussed with the Trash Monitoring Technical Advisory Group (TAG) and recommendations developed.
- An update on the FY 2024-25 Annual Report Format was provided. Draft forms were sent to the Countywide Programs for review and comments were reviewed and incorporated as appropriate. The revised draft forms were sent back to the Countywide Programs on January 27th for approval in February and submittal to the Water Board by March 3rd.
- The Committee received updates from the Regional Work Groups (see below).

External Meeting

• **Regional Work Groups**

- Fire Fighting Discharges Work Group – The last meeting was held on January 14th. Water Board staff presented the work of the Watershed Management Division on orders to fire stations to monitor PFAS in groundwater. A copy of the presentation was emailed to the Work Group after the meeting. The Work Group discussed BMPs to address potential water quality impacts from firefighting water and foam discharged during emergencies.
- Asset Management Work Group – The group has not met since July. A meeting may be held in Spring 2025 to coordinate efforts on reporting and other items.
- BASMAA Surface Cleaning Program – The Spanish language materials, including quizzes and informational items, have been compiled and uploaded to the BAMSC website. A Project Profile for a project of regional benefit to further update and maintain the Surface Cleaning Program was developed by BAMSC for FY 2025-26.
- Long-Term GSI Technical Work Group (TWG) – The TWG had its second meeting on December 5th. The group discussed implementation of different scales of GSI (parcel-based, green streets, and regional) and Water Board staff concerns about large regional projects. The TWG also discussed a proposal from Water Board staff to provide two pathways for compliance with future GSI retrofit requirements: 1) Path 1 would be similar to MRP 3, with increased retrofit acreage targets (informed by TWG discussions); and 2) Path 2 would allow a reduction in retrofits targets if Permittees demonstrated coordinated GSI planning and implementation with other planning efforts (e.g., urban forestry, climate change adaptation, complete streets, and stream restoration). Permittees agreed to consider this approach and provide feedback to Water Board staff at the next meeting (which will be scheduled sometime in March).

• **Collaboration with Regional Water Board Staff (Keith Lichten and Aidan Cecchetti)**

- Trash
 - Response to Comments on Trash Monitoring Plans – Aidan said the Permittees' responses to Water Board staff comments were acceptable, and they had no major concerns. They will follow up with an email confirming approval of both the outfall and receiving water monitoring plans.
 - Rinta Perkins (CCCWP) shared that the Contra Costa Clean Water Program (CCCWP) Permittees held a meeting with Water Board staff, Program Managers, and other Permittees on January 21st to discuss achieving the 100% trash reduction goal. Rinta plans to circulate the draft meeting notes to Water Board staff for their review and will schedule a small working group session to follow up.
- Cost Reporting
 - Keith's understanding from discussion with State Water Board STORMS staff is that they will issue a 13383 Order to MRP permittees saying they need to report costs to the State in FY 2026-27. They don't know if they will be able to review the draft order but Amanda Magee at STORMS has been keeping them informed. Permittees asked for flexibility in the reporting date to the State and whether duplicative reporting in MRP 4 could be avoided. Keith responded that MRP 4 requirements will be similar to State requirements.
- MRP Reissuance Schedule
 - Keith presented two slides with Water Board staff's proposed high-level schedule and considerations for MRP reissuance.

- Slide 1 - High-Level Schedule – includes kickoff in October 2025; Admin Draft of provisions by September/October 2026; public Draft and Board workshop in January 2027; and adoption hearing in May 2027.

Keith added that this schedule doesn't include other opportunities to engage along the way, such as a Water Board workshop on trash in December 2025, and a workshop this summer about C.3. He reminded Permittees that they need to submit Reports of Waste Discharge six months in advance of MRP 3 expiration.

- Slide 2 – Considerations – included communication and meeting strategy; external stakeholder engagement; and focus on priorities. They plan to focus on early “daylighting” of proposed changes and try to finalize areas of agreement sooner.

Keith added that any new provisions will be fairly modest. They will need to add stormwater requirements for Lake Merced and potentially address some new impairments. They also need to consider how to involve more stakeholders, such as Save the Bay and environmental justice communities, and how EPA will engage.

Next Meeting – February 27, 2025

PIP Subcommittee

Chair – TBD

SCVURPPP representative – Vishakha Atre (SCVURPPP)

Next Meeting – TBD

Development Subcommittee – No January Meeting

Co-Chairs – John Steere (Contra Costa County) and Daniel Matlock (City of Fremont)

SCVURPPP representatives – Pam Boyle Rodriguez (City of Palo Alto), Jason Day, Sandra Freitas (City of San José), Peter Schultze-Allen and Jill Bicknell (SCVURPPP)

Next Meeting – March 11, 2024 (meets quarterly)

Trash Subcommittee – January 28, 2025

Chair – Ben Livsey (City of Oakland); *Vice Chair* – Chris Sommers (SCVURPPP)

SCVURPPP representatives – Brad Hunt (Palo Alto), Tiffany Ngo (San Jose), Emma Hinojosa (Sunnyvale), and John Fusco and Chris Sommers (SCVURPPP).

Internal Meeting

- The group briefly discussed the Water Board Letter/Guidance on Bioretention as Full Trash Capture. The group agreed to further discuss next steps in a separate meeting.
- The group discussed the outcome of the January 21st meeting with Water Board staff on the 100% trash load reduction goal.

External Meeting

- Water Board staff provided a summary of their recent letter/guidance on Bioretention as Full Trash Capture and agreed that a separate meeting should be scheduled to discuss their perspectives and direction.
- Water Board staff also briefly summarized the meeting on January 21st and agreed that additional dialogue is needed with Permittees in preparation for the June 30, 2025 deadline.

Next Meeting – April 22, 2025 (meets quarterly)

Monitoring/POCs Subcommittee – No February Meeting

Chair – Beth Baldwin (CCCWP); *Vice Chair* – Lisa Austin (ACCWP)

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

Next Meeting – March 5, 2025 (meets bimonthly)

CASQA Seminar Series
State of the Union: California Stormwater
Meeting Summary
January 23, 2025
10:00 am – 3:00 pm

CASQA's 2024 Accomplishments and 2025 Priorities – Karen Cowan

- Strategic Vision – key pillars include Projects and Programs (Stormwater Capture and Use, True Source Control, Effective BMPs); Policies, Permits, and Legislation; Public Education; and Funding
- Accomplishments in 2024
 - Socioeconomic Value of Urban Stormwater Capture report;
 - Rain Ready California public education campaign/materials;
 - Prop 4 Climate Bond;
 - Influenced State Intended Use Plan;
 - Produced two bacteria guidance documents (on website);
 - Education: Conference attracted over 1,000 attendees. Brought IGP and CGP training programs in-house; QSP Delegate Training Guidelines; and updates to Construction BMP Handbook, including translations of BMP fact sheets in Spanish
- 2025 priorities: Phase II permit; Cost Reporting Tool; other legislative and regulatory issues

State Water Board: The Year Ahead - Karen Mogus, Chief Deputy Director, State Water Board

- Cost Reporting Policy
 - Adopted 1/22/25; first reporting period is FY 26-27 (will open Data Portal in early 2026)
 - Implemented via permits or Section 13383 Orders
 - Will be providing a Guidance Document that can be revised as needed
 - Will provide an information item to the Water Board in 2027 on how it's going, as well as a report to the Board after collection of 5 years of data
- Infiltration Policy
 - STORMS developing statewide policy for consistent guidance for urban stormwater infiltration projects
 - The policy is in the early stages – initial public scoping meetings on 2/3 and 2/6
- Small MS4 (Phase II) Permit
 - Informal draft released August 2024;
 - Currently reviewing comments and preparing to release formal draft by July 2025;
 - Major areas of change: trash provisions, additional TMDLs, cost reporting, asset management
- Construction General Permit (CGP)
 - 2009 CGP coverage terminates on Sept 1, 2025
 - Transitioning QSD/QSP training to 2022 permit
- Industrial General Permit (IGP) – expired in 2024
 - Potential areas of change: formal permits by sector; semi-annual reporting; review of NONA; informal draft by June 2026?
- Los Angeles Region Commercial/Industrial/Institutional (CII) Permit
 - Residual Designation made in 11/24 for two watersheds

- Applies to facilities with >5 acres of impervious surface (a facility may need both IGP and CII)
- EPA eReporting Requirements
 - 12/25 deadline
 - Will comply via reporting through SMARTS (currently evaluating whether any changes are needed)
- Prop 4 Stormwater Grant Program
 - \$110 M in grants to stormwater projects to reduce urban flooding and provide multiple benefits
 - Preference given to “natural infrastructure” projects
 - Timeline
 - Guideline Adoption – Winter 2025
 - Open Solicitation – Winter-Spring 2026
 - Selection/Awards – Summer 2026

Regional Water Boards: Perspectives and Priorities (Moderated Panel)

Eileen White, Executive Officer, Region 2

- Accomplishments – 90% of permittees are in compliance with the 90% trash reduction goal and the other 10% are working hard to address issues such as unsheltered homeless.
- Coordinating with State Water Board on Phase II permit, particularly on incorporation of pesticide and PCB/Hg TMDLs and trash requirements. Cooperation will be important, particularly with Caltrans (joint projects are a win-win).
- Challenges with getting to 100% trash reduction goal and ongoing maintenance; committed to working with permittees and allowing flexibility. Will reflect on what’s working and what’s not working and adaptively manage.

Ryan Lodge, Executive Officer, Region 3

- Also focused on the Phase II permit, as well as stormwater capture and groundwater recharge. Want to retain the Central Coast-specific post-construction requirements.
- Priorities: Meet waste load allocations for TMDLs; restoring natural watershed processes for construction projects; and stormwater capture and recharge (85% of their Region’s drinking water supply comes from groundwater); communication with stakeholders

Patrick Pulupa, Executive Officer, Region 5

- Developed social equity work plans in all programs to understand communities being served. For stormwater, most IGP inspections are being done in low income areas and want to continue that priority.
- Focused on renewal of Phase I regional permit for Central Valley (August 2025 adoption?); assisting with incorporation of TMDLs in Phase II permit; and trash management. For trash, they are trying to find solutions for homeless encampments (“quasi-offset” program to incentivize clean up efforts by permittees).

All agreed that 1) there is a need to build trust with permittees; 2) there are limited resources; 3) communication is critical; and 4) it’s OK to be innovative with clear direction and bounds, build on existing programs and coordinate with other regions.

Rain Ready Campaign – Eileen asked if we can have a consistent statewide message, including coordination with Caltrans’ campaign. Karen Cowan – want this to be a broader, long lasting educational campaign about water. Patrick – thinks the message makes sense, especially to agricultural areas and smaller communities who know the importance of managing water; it’s a civic responsibility.

Federal Perspective - Peter Kozelka, EPA

- Program priorities
 - National: strengthening MS4 permits, timely permit reissuance, trash free waters, climate resiliency, green infrastructure
 - Additional priorities for Region 9: asset management, innovation and capacity building, TMDL implementation
- Stormwater Residual Designation – only applies to two watersheds in LA area and only privately owned parcels; covers unpermitted non-IGP CII properties; currently not planning on expanding the program statewide
- Number of expired MS4 permits in CA has increased to 23
- National IGP proposed in 12/24; to be reissued in early 2026
- PFAS
 - Draft human health water quality criteria published in 12/24
 - Biosolids risk assessment to be completed in 1/25
 - Progress on 2021 PFAS strategic roadmap
 - Final aquatic life water quality criteria for PFOS and PFOA (10/24) and benchmarks for 8 other PFAS
 - Final drinking water standards (4/24)
 - Guidance memo on BMPs for stormwater (12/22)
 - PFAS analytical methods updated – draft out for comment now
- EPA Headquarters memo recommended NPDES permits incorporate climate resiliency, green infrastructure, asset management and consideration of DACs
- Federal Infrastructure Funding through CA State Revolving Fund (FY24)
 - Base Program - \$58M (10-40% forgivable)
 - BIL Supplemental Funding - \$163M (49% forgivable)
 - BIL Emerging Contaminants - \$15M (100% forgivable)
- Sewer Overflow and Stormwater Reuse Municipal Grants Program (OSG)
 - \$4M for CA in FY24 (no permanent funding yet – under continuing resolution)
- Unsure if SF Bay WQIF funding will be affected by new administration.

California Legislative Outlook: 2024 Outcomes and 2025 Priorities - Jaime Minor, Niemela and Pappas

- 2024 Priority Legislation
 - SB1053 – recycled paper bags and carryout bag prohibition – signed (CASQA supported)
 - SB 366 – CA Water Plan: CASQA supported changes to the Plan but Governor vetoed due to fiscal impacts
 - AB 3227 – exempted stormwater facility routine maintenance from CEQA review – passed/signed
 - AB 2257 – made clear the timelines for public protest for property-related water and sewer fees - signed (CASQA supported)
 - SB 1178 – related to improving facilities at the border – died
 - AB 990 – water quality requirements for infill housing – died
- 2024 CA Election Recap
 - 36 newly elected members – will need more education about stormwater issues
 - Electorate was more moderate on ballot initiatives but supportive of infrastructure investments (bonds).
 - Prop 4 (Safe Drinking Water, Wildfire Prevention, Disaster Prep, and Clear Air Bond Act passed – includes \$110M for stormwater and \$100M for urban greening (broad definition). 40% to DACs.

- Prop 5 failed – proposed to lower voter threshold for municipalities to pass bonds or special taxes related to public infrastructure from two thirds to 55%.
- 2025 Policy Themes
 - Wildfire recovery/resilience, Delta conveyance, SGMA, water rights, energy and water pricing and affordability, permitting reform
 - Reactionary policies (protection from Federal actions): WOTUS, PFAS, Chevron, Delta Regulations, endangered species protections, Colorado River
- 2025 Political Themes
 - Governor’s office leading the “resistance”
 - Multiple candidates positioning for 2026 Governor’s race
- CA State Budget
 - Budget generally balanced but released prior to fires
 - Shifted some General Fund allocations for water to bond funding
 - Includes \$173.5 M to improve water storage and replenishment

Regional Water Boards: Ask the Regulator: Construction General Permit (Moderated Panel)

Brandon Roosenboom, State Water Board; Joe Monical, Region 2; Andrew Veloz, Region 4; Erica Ryan, Region 9

- What people need to know:
 - Those with 2009 coverage need to convert their permits to the 2022 permit by August 31, 2025
 - Region 2 - New dewatering provisions in CGP (previously did not have specific requirements for construction and do not plan to develop specific dewatering permit).
 - Risk level 2 has different requirements under 2022 permit;
 - LA region – will be addressing fire impacts and approaches to meeting TMDLs. Some guidance on appropriate BMPs developed for previous fires.
 - (Brandon – do have some state guidance developed after the 2009 CGP; will be updating it for 2022 but intent will be the same. Cleanup activities are not covered by the CGP, but there may be contaminants remaining on site that will need to be addressed during construction. You can file an NAL exceedance report to notify regulators.)
 - Region 9 – note the post-construction requirements in the CGP. Only exemptions from dewatering permit are for single family homes
- What is meant by misuse of end date – in San Diego, builders have misstated end date to get out of some requirements for stabilization. Are increasing enforcement of these cases.
- Approval of NOTs – what if Regional Board takes more than 30 days to approve
 - Automatic 30-day approval only takes effect if there is no response from RWB staff – it doesn’t mean that RWB has to approve within 30 days
 - Often NOT is missing information or some things need clarification
- Do requirements of Appendix J (Dewatering) apply to non-CGP projects?
 - Only apply to projects under CGP – if not, contact RWB staff for requirements
- Planned improvement to SMARTS? – no, just maintenance and small enhancements. Not aware of any changes needed to meet EPA eReporting rules.
- Post-construction requirements – how to demonstrate that the project is covered by local MS4 requirements? Can upload a PDF of the MS4 permit requirements and local guidance manuals or include links to both.

Water Sector Partners – 2025 Priorities

Adam Link, Executive Director, California Association of Sanitation Agencies (CASA)

- Specific recent focus is PFAS and presence in biosolids
 - Developing resources, participating in studies, following legislation and industry reaction, looking at land application of biosolids
 - Message – it’s all about source control and making manufacturers responsible
- Addressing silo-ing by different regulatory agencies and requirements that are not coordinated or efficient, especially related to emerging issues
- Infrastructure financing – watching what Federal government will do, identifying other sources
- Partnerships – looking for opportunities to partner with other organizations such as CASQA (formed “CASA Research Collaborative” to bring together NGOs, regulators, consultants, academia, etc.)
- Strong legislative advocacy, Including air, climate, and energy issues

Danielle Blacet-Hyden, Executive Director, California Municipal Utilities Association (CMUA)

- Big focus is water-energy nexus
- Legislative priorities (* = opportunities to collaborate with CASQA)
 - SB 72 Water for All – adds stormwater capture as a strategy for sufficient supply*
 - Low-income water rate assistance
 - Affordability
 - Water rights
 - Efficiently allocating bond funds*
 - Wildfires and implications for water resources and power systems*
- Regulatory priorities
 - PFAS, chromium-6
 - Implementation of conservation regulations
 - Healthy Rivers and Landscapes program
 - New bond funds, including those for stormwater management

STORMS Update - Amanda Magee, State Water Board

- 2024 Year in Review
 - Cost Reporting Policy
 - Develop revised Guidance by Summer/Fall 2025 and issue 13383 Orders
 - Open Cost Data Portal for registration in early 2026
 - FY 26-27 – first reporting year
 - First cost reports due with FY 26-27 ARs
 - Urban Stormwater Infiltration Policy
 - Clear statewide policy for stormwater runoff infiltration projects
 - Public workshops on 2/3 and 2/6; CEQA scoping meeting on 3/12/25
 - Draft policy release in late 2025, with additional public workshops
 - Site-specific Water Quality Objectives for Copper and Zinc
 - How to develop WQOs, not development of specific WQOs
 - Mechanistic Study of BMP Treatment Processes
 - Finishing up project with SCCWRP
- CA Water Supply Strategy
 - Collecting data on how much stormwater we are currently capturing and what is the potential for future capture (developing guidance on using GIS strategy for assessing future capture)
- Next Steps for STORMS – looking at narrowing down priorities for this group. Have shifted from research and guidance/tools to policy and regulation; want to find equilibrium. Doing an internal evaluation and will issue a call for projects and reinstitute the Implementation Committee.

C3 Provision Oversight Ad Hoc Task Group (C3PO AHTG)

Meeting Summary

January 27, 2025

1:30 – 3:00 pm

Announcements

The following announcements were made:

- Jill Bicknell (Program staff) informed the AHTG that the Contra Costa Clean Water Program (CCCWP) is conducting a study to estimate annual O&M costs for Green Stormwater Infrastructure (GSI) in the Bay Area and California and would like to compile annual O&M cost data from Permittees throughout the Bay Area. Program staff will send an email with this request to AHTG.
- Program staff updated the GSI details in Part 2 of the GSI Handbook. The revised details were sent to the C3PO AHTG for review. Comments are due on February 14, 2025.
- Roger Storz (Campbell) reported that the City of Campbell held a study session on GSI for the City Council. The biggest concern was O&M costs. The O&M cost for the Hacienda Avenue Green Street is \$100,000/year, which includes \$65,000 /year for irrigation.

Regional C3/GSI-Related Work Groups

Jill provided an update on the Regional Long-Term GSI Technical Work Group (TWG). The TWG had its second meeting on December 5th. The group discussed implementation of different scales of GSI (parcel-based, green streets, and regional) and Water Board staff concerns about large regional projects. The TWG also discussed a proposal from Water Board staff to provide two pathways for compliance with future GSI retrofit requirements: 1) Path 1 would be similar to MRP 3, with increased retrofit acreage targets (informed by TWG discussions); and 2) Path 2 would allow a reduction in retrofit targets if Permittees demonstrated coordinated GSI planning and implementation with other planning efforts (e.g., urban forestry, climate change adaptation, complete streets, and stream restoration). TWG members agreed to consider this approach and provide feedback to Water Board staff at the next meeting (which will be scheduled sometime in March).

C.3/GSI Workshop

The FY 24-25 C.3 workshop will be held on April 29, 2025 at the Campbell Community Center. The AHTG reviewed the draft agenda and provided input. Some attendees agreed to present information at the workshop on Silva Cells and maintenance of bioretention areas.

A workshop registration form will be distributed to the C3PO AHTG soon.

Approach to Developing an Alternative Compliance Program

Jeff Sinclair (Program staff) gave a presentation describing an approach to developing an alternative compliance program. The presentation described MRP 3.0 requirements, important considerations for setting up alternative compliance programs (i.e., Inventory development, legal analysis, financial analysis, coordination and outreach, program administration, and implementation), and potential SCVURPPP tasks to assist Co-permittees with developing alternative compliance programs. The AHTG recommended forming a Work Group to discuss alternative compliance.

Action Items:

- Program staff will share the CCCWP O&M cost data request.
- AHTG members will provide feedback on the GSI details by February 14.
- Program staff will send a workshop registration form to the AHTG.
- Program staff will send an email to the AHTG inviting participation in an Alternative Compliance Work Group with a link to a meeting poll.

Next Meeting – March 24, 2025.

Meeting Attendance List

Meeting:	C3PO AHTG
Location:	Zoom
Date:	January 27, 2025, 1:30– 3:00 pm
Name	Agency
Roger Storz	Campbell
Ursula Syrova	Cupertino
Alex Wong	Mountain View
Zach Wu	Mountain View
Brad Hunt	Palo Alto
Pam Boyle Rodriguez	Palo Alto
Cesar Arellano	San Jose
Sandra Freitas	San Jose
Vivian Tom	San Jose
Damaris Han	Santa Clara
Gaurav Kumarllemos	Santa Clara
Darrell Wong	Santa Clara County
Julianna Martin	Santa Clara County
Kara Baker	Stanford
Dustin Clark	Sunnyvale
Emily Kam	Sunnyvale
Emma Hinojosa	Sunnyvale
James Downing	Valley Water
Kendra Boutros	Valley Water
Sheila Tucker	WVSWA
Julie Schaer	WVSWA
Jeff Sinclair	SCVURPPP
Jill Bicknell	SCVURPPP
Peter Schultze-Allen	SCVURPPP
Renee Crawford	SCVURPPP
Vishakha Atre	SCVURPPP



SCVURPPP Information Management (IM) Ad Hoc Task Group (AHTG)

Meeting Summary Report

February 6, 2025

Key Issues Discussed:

Introductions, Announcements, and Agenda Review

Meeting participants introduced themselves and agreed on the agenda.

FY 24/25 Task Summary Review

Program staff walked through a consolidated list of upcoming FY 2024/25 SCVURPPP Asset Management Work Plan tasks and highlighted those tasks already completed or in progress.

Topic 3: Condition Assessments

Program staff shared the general approach planned for SCVURPPP-led condition assessment trainings. The plan will be to go to three different sites, each with at least two assets. The number of attendees will be limited to 20 per training to allow for more effective group participation and calibration. While at the site, participants will divide into groups of 10 each led by a different trainer. Each trainer will provide an overview of what to look for when conducting a condition assessment. Then the participants will use the SCVURPPP Asset Management Data Collection Tool to conduct condition assessments individually on the same asset. Once complete, the group will then review the scores together via the app and calibrate through discussion. Program staff asked whether a pre-training should be provided before the onsite condition assessment training to provide attendees with background on asset management and condition assessment parameters. AHTG members indicated that a pre-training would be desired to orient attendees with the topic. Program staff also informed the AHTG members that separate video training modules are being developed to guide participants on how to download the tool, add new assets, and fill out the condition assessment form. Program staff requested that AHTG members let them know if they had a site within their jurisdiction that they'd like to use for one of the trainings, how many attendees they planned to have attend, and the names/email of those attendees.

AHTG members asked several questions about the capabilities of the app and how it could interact with their existing or planned internal data collection tools. Program staff let them know that the app was created for initial data collection purposes and that the condition assessment form was added to make field data collection more efficient. While Co-permittees can collect data separately, that data will need to be shared with SCVURPPP so that it can be included in the countywide likelihood of failure (LoF) and consequence of failure (CoF) analysis (i.e. Risk Analysis). LoF and CoF are required to be considered by the MRP in the implementation of asset management plans. Exports from individual databases can be uploaded to the SCVURPPP asset management database.

SCVURPPP Information Management Workplan Development

Program staff presented on the general information management for SCVURPPP data and files. Currently, the way data and files are managed is less than ideal and presents several inefficiencies which were described at a high level. Program staff recommended modifications to the current information management approach which involved shifting to a single file storage structure that is linked to an easily accessible SharePoint page user interface. Program staff walked through an example of a SharePoint page

for Asset Management and the different functions that could be included. AHTG members agreed that the recommended approach for internal information management would be useful and preferred over the current approach. Program staff recommended that the external website continue to be used for final document sharing but that the interface be minimal. AHTG members agreed with that recommendation and requested that the internal information management structure be the priority.

Next Meeting – March 6, 2025 (10:00-11:30pm).

Next Steps/Action Items

- Program staff will:
 - Provide the presentation discussed at today's meeting in the SCVURPPP share drive folder: [2-6-25 Meeting](#)
 - Plan and schedule condition assessment trainings and share initial training modules.
- The Information Management AHTG will:
 - Provide information on potential sites and attendees for the condition assessment trainings.
 - Review documents and provide comments as appropriate.

Meeting Attendance List

Location	Zoom Videoconference
Date	November 1, 2024, 1:00-2:30pm
Name	Agency
Julianna Martin	County of Santa Clara
Vanessa Marcadejas	County of Santa Clara
Zhenzhen Jiang	County of Santa Clara
Brian Jones	Mountain View
Pam Boyle-Rodriguez	Palo Alto
Brad Hunt	Palo Alto
Murdo Nicolson	Palo Alto
James Downing	Valley Water
Ursula Syrova	Cupertino
Riley Moffat	Cupertino
Mary Morse	San Jose
Jason Day	San Jose
Norm Mascarinas	San Jose
Winola Cheong	Sunnyvale
Emma Hinojosa	Sunnyvale
Colleen Trostle	Santa Clara
Mathew Mendriski	Santa Clara
Sheila Tucker	West Valley Stormwater Authority
Chris Sommers	SCVURPPP Program
Kristin Kerr	SCVURPPP Program
Jill Bicknell	SCVURPPP Program
Jeff Sinclair	SCVURPPP Program
Jason Wong	SCVURPPP Program

State Water Resources Control Board's Urban Stormwater Infiltration Policy

Webinar Summary

February 6, 2025

10:00 am – 12:00 pm

Presenters: Amanda Magee and Kelly Rodman (State Water Board)

- This is one of two informal webinars State Board staff organized to present information on the proposed Urban Stormwater Infiltration Policy (Policy). No action will be taken based on comments received at the webinars. The intent is to seek early feedback on scope, hear concerns, and learn about any unintended consequences.
- The Policy development project is at an early stage. It has not been approved by the State legal counsel or the State Water Board.
- Written “informal” comments are due by February 24, 2025. The State Board will not provide a formal response to comments. The comments will be addressed in the staff report.
- The Policy is being developed to address the Governor’s 2022 California Water Supply Strategy which sets goals to increase water supply through urban stormwater projects.
- While stormwater capture projects are widespread, there are a lot of barriers to implementation in addition to confusion about guidelines, regulations, potential groundwater quality impacts (especially drinking water aquifers), maintenance, etc. Many agencies are responsible for stormwater management (US EPA, State and Regional Water Boards, and local agencies). This leads to confusion about when, where, and how to implement stormwater capture projects, and which entity is ensuring that all regulations are being followed. The proposed Policy will seek to address all of these topics/issues.
- The Policy will build upon the 2020 drywell guidance https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/docs/drywellguidance.pdf
- The three objectives for this project are:
 - Develop a clear statewide policy for the planning and implementation of urban stormwater infiltration projects.
 - Encourage stormwater capture and infiltration in urban areas to meet water supply strategy goals.
 - Protect groundwater quality and beneficial uses.
- State Board staff are conducting outreach to tribal communities and underserved communities.
- The Policy will apply to urban stormwater infiltration (urban areas defined in the 2020 census).
- It will not apply to non-urban infiltration such as Flood-MAR and Ag-MAR.
- The Policy will apply to drywells, infiltration basins and galleries, regional infiltration projects, infiltration trenches, large scale bioretention/bio infiltration projects, and other systems designed to intentionally infiltrate significant volumes of urban stormwater from large catchment areas.
- The Policy will not apply to small scale systems such as residential bioretention areas and pervious driveways.

- Existing infiltration systems will be exempt unless they are failing or degrading groundwater quality (need to define what a “failing system” means).
- The Policy will include the following four Risk Tiers (similar to the 2020 drywell guidance) based on land use and pollutants of concern:
 - Tier 1 Low risk infiltration systems – low to high residential, commercial less than 5 acres, etc.
 - Tier 2 Medium risk infiltration systems – commercial greater than 5 acres of impervious surface, roads with light and medium traffic, transit stations
 - Tier 3 High risk infiltration systems – industrial areas, high traffic roads, chemical storage
 - Tier 4 Prohibited – minimum setbacks cannot be met, potential for contamination (industrial areas), legacy industrial contamination.
- The Policy will include setback requirements:
 - Setbacks to protect drinking water – 100 ft setback from drinking water supply wells and onsite waste treatment systems (septic tanks)
 - Setbacks from known contaminated sites, superfund boundaries, etc.
- State Board staff are working with Industrial General Permit (IGP) writers to figure out infiltration policies for industrial sites (high risk).
- The Policy will include guidance for pretreatment and maintenance.
- The Policy will **not** be a separate permit. It will likely be put in place through MS4 permits in their next issuance cycle.
- State Board staff are reviewing MS4 permits for existing requirements for infiltration. Not all MS4 permits have infiltration requirements/language. The State Board would like to make the requirements consistent. State Board staff are also looking at Attachment I of the IGP.
- The Policy will propose standards for where infiltration can be done. It will not make infiltration mandatory for all development projects.
- The Policy may have monitoring requirements depending on risk level (high risk and use of groundwater basins).
- The Policy will not require tracking and reporting metrics for infiltration systems. It will include an asset management tracking database, but it will be encouraged and not required.
- Next steps
 - CEQA scoping meeting on 3/12/2025
 - Draft policy in late 2025
 - Workshops for public comment following release of draft policy
- Recording of presentation and Q&A posted at https://www.waterboards.ca.gov/water_issues/programs/stormwater/storms/projects/urban_storm_water_infiltration_policy.html

Proposed setbacks

Type	Setback Description	Number
Vertical	Distance to seasonally high GW table	10 ft
Vertical	Distance to bedrock or limiting layer	5 ft
Horizontal	Distance to drinking water supply well	100 ft
Horizontal	Distance to contaminated sites	250 ft
Horizontal	Distance to onsite waste treatment system	100 ft
Horizontal	Distance between infiltration systems	100 ft
Horizontal	Distance to a surface water body	100 ft

Proposed policy components



California Stormwater Quality Association®

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

January 15, 2025

Eric Dubinsky
United States Environmental Protection Agency, Region 9
75 Hawthorne Street, Mail Code WTR-2-1
San Francisco, CA 94105

Submitted via email: dubinsky.eric@epa.gov

Subject: Comment Letter – USEPA Partial Approval/ Partial Disapproval of the 2024 California Integrated Report

Dear Mr. Dubinsky:

On behalf of the California Stormwater Quality Association (CASQA), thank you for the opportunity to comment on USEPA's Partial Approval/Partial Disapproval of the 2024 California Integrated Report distributed on December 12, 2024 (USEPA Partial Approval/Disapproval). CASQA's primary intent and goal is to provide comments that will assist in improving the state's listing process, particularly for issues that are applicable at the statewide scale so that we can avoid similar issues in future listing cycles.

This comment letter is being submitted to specifically address USEPA's decision to recategorize 44 waterbodies for benthic community effects from Category 3¹ to Category 5². For the reasons described below, CASQA does not agree with USEPA's recategorization and requests that the 44 waterbodies for benthic community effects remain in Category 3 as initially described in the State Water Resources Control Board's (State Water Board's) Final Integrated Report (2024 Integrated Report), adopted on March 13, 2024.

THE LISTING OF THE 44 WATERBODIES FOR BENTHIC COMMUNITY EFFECTS IN CATEGORY 3 IS CONSISTENT WITH CALIFORNIA'S ADOPTED WATER QUALITY CONTROL POLICY FOR DEVELOPING THE CLEAN WATER ACT SECTION 303(D) LIST (LISTING POLICY)

As noted in the State Water Board 2024 California Integrated Report Final Summary of Comments and Responses (March 2024) (State Water Board Response to Comments), Section 3.9 of the California Listing Policy (Degradation of Biological Populations and Communities) explicitly states, in part, the following (emphasis added):

*A water segment shall be placed on the section 303(d) list if the water segment exhibits significant degradation in biological populations and/or communities as compared to reference site(s) **and is associated with water or sediment concentrations of pollutants** including but not limited to chemical concentrations, temperature, dissolved oxygen, and trash.*

Association of chemical concentrations, temperature, dissolved oxygen, trash, and other pollutants shall be determined using sections 3.1, 3.2, 3.6, 3.7, 6.1.5.9, or other applicable sections.

¹Category 3 – There is insufficient available data and/or information to make a use support determination.

²Category 5 - Available data and/or information indicate that at least one designated use is not being support or is threatened, and a TMDL is needed.

Thus, consistent with the State adopted Listing Policy, a benthic community water quality limited segment shall only be placed on the 303(d) list as Category 5 requiring a TMDL if two conditions are met:

- 1) The water segment exhibits significant degradation in biological populations and/or communities as compared to reference site(s); AND
- 2) The above referenced significant degradation is associated with water or sediment concentrations of pollutants

Further, during the State Water Board's 2015 amendment and adoption process of the State's Listing Policy, USEPA did not comment on the Listing Policy in general, or on Section 3.9 specifically. Therefore, it is unclear why USEPA is now taking this position on the benthic community effects listings. Importantly, USEPA's disapproval of the State Water Board's decision for these listings effectively overrules the adopted State Listing Policy, and renders Section 3.9 invalid.

In addressing comments received during the development of the 2024 Integrated Report regarding the use of Category 3 instead of Category 5 for these 44 water quality limited segments (WQLS), the State Water Board provided the following rationale (excerpt and emphasis added):

In previous listing cycles, that directive [the association of a pollutant] was construed as meaning that a pollutant impairment affecting aquatic life was itself the requisite "association." In recognizing that at least some judgement is involved in construing the requirement of an associated pollutant and that section 3.9 does not elaborate on how to determine if the degraded biology is "associated" with water or sediment pollutant concentrations, it has been determined that greater clarity needs to be provided in how to make decisions under section 3.9 for purposes of transparency and greater confidence in listing decisions.

Better understanding of the challenges associated with the determination of the cause of degraded biology and the potential implications of the listing decisions (see comments below), support the State Water Board's determination that greater clarity needs to be provided within the Listing Policy language and a methodology developed to assist in determining how degraded benthic communities are "associated" with a pollutant(s) in addition to other pollution related parameters. CASQA strongly supports the rationale provided by State Water Board staff within the State Water Board Response to Comments and the decision to make different determinations during this listing cycle as a result of the new and evolving information they were provided on previous listing decisions.

THE REQUIREMENT TO LIST A WQLS IN CATEGORY 5 UNLESS THE STATE CAN DEMONSTRATE THAT NO POLLUTANT(S) CAUSES OR CONTRIBUTES TO THE IMPAIRMENT IS AN INAPPROPRIATE BURDEN FOR BENTHIC COMMUNITY EFFECTS AND IS NOT A REGULATORY REQUIREMENT.

The federal Clean Water Act (CWA) recognizes that the States have a primary role in in water quality planning, including 303(d) listing determinations. As such, USEPA has an oversight role and ensures that the federal requirements are met by the States. With regard to potential alterations to benthic communities in California waterbodies, the State Water Board has determined that there is insufficient technical evidence and that the tools to fully and accurately evaluate benthic alterations (i.e., CSCI) are not currently available to support a Category 5 listing as part of the 2024 Integrated Report. The State Water Board's decision to place the receiving water segments in Category 3, and not Category 5, is justified given the status of the CSCI tool and the remaining issues associated with the application of the tool that have been well documented over the past decade. USEPA's decision to override the State's categorization is therefore arbitrary and subjective.

In the USEPA Partial Approval/Disapproval, USEPA states that a WQLS must be on the 303(d) list and require a TMDL unless the state can demonstrate that no pollutant(s) causes or contributes to the impairment. The citation for this requirement was, in part, the March 2023 USEPA memorandum "Information Concerning 2024 Clean Water Act Sections 303(d), 305(b), and 314 Integrated Reporting and Listing Decisions." However, this memorandum notes the following (emphasis added):

*While this document cites statutes and regulations that contain requirements applicable to topics such as WQS, water quality assessment, and the establishment of TMDLs, **it does not impose legally binding requirements** on EPA, states, territories, authorized tribes, other regulatory authorities, or the regulated community, and **may not apply to a particular situation based upon the circumstances**. EPA, state, territorial, authorized tribal, and other decision makers **retain the discretion to adopt approaches on a case-by-case basis that differ from those provided in this Integrated Reporting memorandum (IR memo)** as appropriate and consistent with statutory and regulatory requirements.*

In fact, within the 2024 Integrated Report, the State Water Board used their discretion to use a different approach. They determined that there was a need to consider these 44 WQLS in a consistent manner and develop a methodology to provide a more robust and transparent way to associate the degradation with the stressors. The State Water Board Response to Comment notes:

There is a need to clarify and develop a methodology for associating degraded biological populations with pollutant concentrations under Listing Policy section 3.9, including the consideration of site-specific data and information, when determining biological community effects impairments. Time to develop the methodology will help ensure Listing Policy section 3.9 is applied in an appropriately consistent manner.

CASQA agrees with this approach, especially since degraded biological populations are often the result of a multitude of non-pollutant pollution as well as pollutants. Determining which of these factors are occurring, to what degree, and what factors are clearly associated with the degraded populations is a complex and time-consuming process, which often leads to the identification of numerous, potential stressors instead of a singular or limited, known cause.

Given the implications of a Category 5 listing to the regulated community (see the comment below), it is critical that limited public resources are expended on impairments which have a level of certainty that a pollutant is significantly causing or contributing to the impairment. The placement of these waterbodies on the 303(d) list in Category 5 requiring a TMDL even if the cause of the impairment is unknown places an inordinate burden on both the regulators and the regulated agencies. CASQA submits that it is better public policy to place these WQLS in Category 3 until the State Water Board can develop and utilize a methodology for associating the degraded biological populations and the magnitude of the degradation with pollutants and/or other non-pollutant pollution factors. Once this methodology is developed, it can be applied to the WQLS in Category 3 and modified as needed, which is, in fact, what the State Water Board proposed. This approach will assist the regulated community in focusing on those WQLS that have a level of certainty that a pollutant(s) are significantly causing or contributing to the impairment.

WATER QUALITY LIMITED SEGMENTS INCLUDED ON THE 303(D) LIST RESULT IN AN IMMEDIATE AND MATERIALLY SIGNIFICANT IMPACT FOR REGULATED ENTITIES.

It is important to recognize that the inclusion of the 44 WQLS on the 303(d) list as Category 5 instead of in Category 3 results in an immediate and material impact for the regulated entities irregardless of the priority for the development of TMDLs and if a pollutant has been identified.

Many municipal stormwater permits require numerous planning and/or implementation actions due to 303(d) listings (prior to the development of TMDLs). Examples of the types of requirements that are in Phase I Permits and/or the Phase II Permit include, but are not limited to the following:

- Stormwater program management plans (e.g., pollutant load reduction plans, watershed management plans, stormwater management plans, water quality improvement plans) must assess current receiving water quality (including listings on the 303(d) list) and identify the high priority water quality constituents/conditions from that evaluation. This permit requirement has the most significant impact since the high priority constituents/conditions drive the management actions and control measures that are ultimately incorporated into the management plans.

Comment Letter – USEPA Partial Approval/ Partial Disapproval of the 2024 California Integrated Report

- Other stormwater program elements that have direct requirements based on 303(d) listings include:
 - Illicit Discharge Detection and Elimination – inspection frequencies and/or prioritization
 - Planning and Land Development – identification of BMPs for implementation
 - Construction – inventories (and resulting requirements for sites on the inventories), inspections
 - Industrial/Commercial – inventories (and resulting requirements or facilities on the inventories)
 - Existing Development – inventories (and resulting requirements for facilities on the inventories)
 - Monitoring Program – study design, monitoring, and analysis

Universally, the 303(d) list impacts prioritization processes and, therefore, the allocation of limited public resources.

Thank you again for the opportunity to comment on USEPA Partial Approval/Disapproval of the 2024 California Integrated Report. If you have any questions, please contact me at (310) 462-4939 or karen.cowan@casqa.org.

Sincerely,



Karen Cowan, Executive Director
California Stormwater Quality Association

cc: Karen Mogus, State Water Resources Control Board
Phil Crader, State Water Resources Control Board
Nick Martorano, State Water Resources Control Board
Rebecca Fitzgerald, State Water Resources Control Board
CASQA Board of Directors
CASQA Executive Program Committee
CASQA Policy and Permitting Subcommittee
CASQA Monitoring and Science Subcommittee



January 30, 2025

Janis Cooke
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

Submitted via email: Janis.Cooke@waterboards.ca.gov

Subject: Comment Letter – A Technical Foundation for Biointegrity and Eutrophication Indicators and Thresholds for Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor (Technical Report 1367)

Ms. Cooke:

On behalf of the California Stormwater Quality Association (CASQA), thank you for the opportunity to comment on *A Technical Foundation for Biointegrity and Eutrophication Indicators and Thresholds for Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor (Technical Foundation Report or Report)*, developed by the Southern California Coastal Water Research Project (SCCWRP) and released for public comment by the Central Valley Regional Water Quality Control Board (Central Valley Regional Water Board). We understand that the purpose of this Report was to conduct new analyses to explore the potential limits of biological integrity in modified channels¹ and to assess the applicability of biointegrity tools in urban and agricultural regions of the Central Valley, where channel modifications are extensive.

Purpose of CASQA's Comments

CASQA's primary goal in providing these comments is to contribute to the collective statewide technical understanding of biointegrity reference conditions and indices in modified channels. Additionally, CASQA seeks to ensure that the range of policy decisions necessary for implementing a biointegrity program are developed and vetted through a transparent public process. This public process is especially critical given that the Report's analyses and findings may inform the development of the State Water Board's *Biostimulation, Cyanotoxins, and Biological Condition Provisions*.

Key Concerns

CASQA's comments focus on three primary issues:

1. **Distinguishing Policy Decisions from Technical Findings** – The Report goes beyond its intended technical scope by making several determinations related to policy questions that have yet to be addressed by the Water Boards. It is essential to clearly differentiate unresolved policy issues from technical analyses to ensure these decisions remain open for future discussion and stakeholder input.
2. **Limited Stakeholder Engagement** – The development of the study and the review process for the Technical Foundation Report lacked sufficient outreach to affected stakeholders. Broader engagement and

¹In this context, the term "modified channels or streams" encompasses constructed channels and waterways whose shape and/or hydrology have been engineered or significantly altered by human activities.

Comment Letter – SCCWRP Technical Foundation for Biointegrity and Eutrophication Indicators and Thresholds for Modified Channels, Intermittent Streams, and Streams on the Central Valley Floor

collaboration are necessary to ensure that key stakeholders have the opportunity to provide meaningful input.

3. **Concerns with Modified Channel Analyses** – CASQA has identified concerns regarding the methodology and conclusions of the modified channel analyses and is providing recommendations for clarification and potential revisions.

Limitations of the Review Period

The 30-day comment period significantly restricted CASQA's ability to conduct a thorough review of the Technical Foundation Report, its Supplemental Material (nearly 300 pages), and the raw data and analyses. If the Report is used in the future to inform the *Biostimulation, Cyanotoxins, and Biological Condition Provisions*, CASQA requests that stakeholders be given sufficient time to review and discuss its use within the State Water Board's process.

Request for Consideration of Comments

CASQA prefers that all comments are considered, and applicable modifications to the Report are completed, before it is finalized. However, given the notice's caveat that modifications to the Report may not be possible due to budget constraints, CASQA is requesting that comments be addressed in one of two ways:

1. **Foundational Technical Report Modifications** – Direct modifications to the Report to provide critical clarifications before finalizing the document.
2. **Report Cover Letter Clarifications** – A cover letter, developed and published by the Central Valley Regional Water Board, that identifies the need for future analyses, policy decisions, stakeholder input, and the context and limitations for potential use of the Report's information in the Statewide process, or other similar objective setting process.

Additionally, CASQA requests that all comments received during the January 2025 public notice period are addressed through a formal response to comments by the Central Valley Regional Water Board, to ensure transparency and document how the comments will be addressed now and / or in the future.

COMMENT #1: THE REPORT NEEDS TO DISTINGUISH CLEARLY BETWEEN POLICY DECISIONS AND TECHNICAL FINDINGS.

As noted within the cover letter from the Executive Officer of the Central Valley Regional Water Board, the purpose of completing the additional analyses described within the Technical Foundation Report was to:

“...develop an understanding of the potential limits to biological integrity in modified channels and biointegrity tools in urban and agricultural regions of the Central Valley, where channel modification has been extensive.”

Although the Technical Foundation Report states – and CASQA agrees – that it “is not intended to endorse the use of specific thresholds or waterbody classifications in policy or regulatory programs,”² several conclusions within the Report are based on policy decisions rather than technical findings.³ This approach contradicts the Report's assertion that its conclusions are “not intended to identify specific policy decisions that the Water Boards should make.”⁴

To maintain consistency with its stated intent, the Report should clearly distinguish technical analyses from policy decisions. The technical analyses should present various scenarios while explicitly identifying the associated policy questions and decision points. This distinction is essential to ensure that the State Water Resources Control Board

² Technical Foundation Report, page xiv.

³ For example, drawing conclusions about whether or not modified channels can meet reference-based thresholds, based on a criteria of 10% of the modified channels being able to meet the threshold. See also Comments #3, #4, #5, and #6.

⁴ Technical Foundation Report, page 83

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(State Water Board) and the Central Valley Regional Water Board can appropriately use the technical information to inform, rather than preempt, policy decisions as part of the statewide process.

To enhance clarity, all policy-related questions and decision points should be explicitly outlined in the introduction and referenced at key locations throughout the document. This will provide regulatory agencies with a comprehensive understanding of the full scope of policy decisions and how one decision may influence another. Clearly identifying these policy elements will also help prevent the premature use of technical findings for regulatory purposes before policy decisions have been made.

Additionally, as part of the statewide process, sensitivity analyses should be conducted to allow stakeholders to provide fully informed input. This will ensure that the policy decisions made by the State Water Board and Regional Water Boards are based on a transparent and well-supported technical foundation.

Based on CASQA's involvement over the past decade with the State Water Board regarding the development of the Biostimulation, Cyanotoxins, and Biological Condition Provisions and the issues noted within the Report, the applicable Policy decisions that should be identified within the Report to provide context for the technical analyses include, but are not limited to, the following:

- What types of attributes characterize a “modified” channel?
- How is a “modified” channel defined?
- How should bioassessment data be interpreted within a modified channel and/or classes of modified channels?⁵
 - What biological condition is reasonable to expect within a modified channel?
 - How would an impairment be identified?
 - How would attainment be assessed?
 - Is the proposed threshold(s) reasonably attainable within the majority of the modified channels?
- Should a reference-based threshold, best-attainable, or a best-observed biointegrity threshold be used for modified channels?⁶
- For stream reaches that have undergone a conversion from perennial to intermittent (or vice versa) due to human activity – should the stream reach be assessed based on the current or historic flow duration status?⁷
- How should bioassessment indices be used within modified channels (e.g., standard usage, alternative usage, supplemental usage)?⁸
- What level of stringency should be used for eutrophication indicator thresholds (which is, in part, based on the confidence required in achieving a biointegrity outcome)?⁹

⁵ Technical Foundation Report, page 1; “We also provide a range of thresholds to help interpret bioassessment data in modified channels; however, the choice of whether to use these thresholds and manage such channels differently from natural ones is a policy matter and cannot be decided by technical analysis alone.”

⁶ Technical Foundation Report, page 146; “This determination is fundamentally a matter of priorities and policy that cannot be made on a strictly technical basis.”

⁷ Technical Foundation Report, page 56.

⁸ Technical Foundation Report, page 83; “These usage categories are presented to support the Water Boards in the development of policies for modified channels but are not intended to identify specific policy decisions that the Water Boards should make.”

⁹ Technical Foundation Report, page 106; “The level of stringency to use is a policy decision based on the desired confidence in achieving a biointegrity outcome. This study does not endorse a specific level of stringency, and policymakers may want to consider levels of stringency other than those included in this study.”

CASQA Recommendation:

- *Report Modification - Include a summary of the Policy questions/decisions points within the Introduction.*
- *Report Modification - Identify each of the applicable Policy questions/decision points within the various sections for the specific analyses.*
- *Report Cover Letter - Clarify that there are unresolved policy questions and decision points and they will remain open for future discussion and stakeholder input before any thresholds in the Report are used for regulatory purposes.*
- *Report Cover Letter - Clarify that, as a part of the development of the Statewide Biostimulation, Cyanotoxins, and Biological Condition Provisions, additional review of the Foundation Technical Report will be provided and additional analyses may be conducted.*

COMMENT #2: THE STATEWIDE STAKEHOLDER ADVISORY GROUP THAT IDENTIFIED CONCERNS FOR MODIFIED CHANNELS IN GENERAL, AND ON THE CENTRAL VALLEY FLOOR SPECIFICALLY, WAS NOT ENGAGED.

As a part of the original State Water Board Biological Integrity Project outreach and engagement process, three advisory groups were established in 2010:

- Stakeholder Advisory Group (SAG);
- Scientific Advisory Group; and
- Regulated Advisory Group

CASQA has been actively engaged in this process since 2010 and had official representation within the SAG. Throughout the development of the series of technical documents and identification of Policy-related issues over the past fifteen years, CASQA and the SAG raised a wide range of concerns related to how modified channels would be addressed within a Biointegrity Policy and how channels were being characterized within the Central Valley floor. During the 2017 and 2018 SAG meetings, there were continued discussions regarding the constraints on biological integrity in streams in developed landscapes.¹⁰ In fact, these concerns resulted in the Technical Foundation Report being contracted by the Central Valley Regional Water Board.

CASQA's process-related concerns are two-fold:

- **Central Valley stakeholders were not engaged or consulted.**

Although the concerns addressed by the Report were raised as a part of the State Water Board Biological Integrity Project, the SAG and specifically, the Central Valley region regulated agencies who own, operate and/or conduct their daily work activities in and around these channel segments, were not sufficiently consulted. This is an unfortunate and missed opportunity because the stakeholders in the Central Valley region have valuable insight and understanding related to the channel segments on the valley floor and could have provided input through the course of the study that would have ensured it was accurate and reflective of current conditions and constraints. Instead, decisions regarding the management questions, technical approach, and analyses throughout the course of the study were conducted without any input from the SAG or Central Valley stakeholders.

¹⁰ Constraints on Biological Integrity in Streams in Developed Landscapes (SCCWRP), March 17, 2017 and Prioritizing Management Goals for Stream Biological Integrity within the Developed Landscape (SCCWRP), September 19, 2018.

- **The review process for the Technical Foundation Report is not being conducted in a manner consistent with information developed as a part a statewide policy or program.**

It is not clear why the Technical Foundation Report was provided to the SCCWRP Commission's Technical Advisory Group (CTAG) (comprised solely of Southern California agencies) prior to and/or potentially instead of the Central Valley region stakeholders and/or Central Valley Regional Water Board. It remains unclear if comments from organizations outside of CTAG, including the Central Valley region stakeholders, will even be considered through this process as the public notice states, "The comments received will be shared with SCCWRP before finalization of the Report, however, there is not a contractual obligation to revise the Report."

It is critical that the comments received as a part of the review of the Technical Foundation Report be fully considered and, as applicable, the Report be modified to address those comments.

CASQA Recommendation:

- *A response to comments should be developed to identify how the comments were addressed within the Technical Foundation Report.*
- *Report Cover Letter – If the Technical Foundation Report is not modified based on the comments received, the cover letter should note that the Report will be reviewed and modified in the future to address comments received prior to its use within the Statewide Biostimulation, Cyanotoxins, and Biological Condition Provisions, or other similar objective setting process.*

COMMENT #3: THE FRAMEWORK USED TO DEVELOP THE ANALYSIS IN PART 2 OF THE REPORT IS BASED ON POLICY DECISIONS, NOT TECHNICAL EVALUATIONS, AND WAS DEVELOPED WITH INSUFFICIENT INPUT TO MAKE CONCLUSIONS.

CASQA is concerned that the analysis in *Part 2: Eutrophication and Biointegrity Indicators for Modified Channels* includes several policy decisions despite stating that the analysis is not intended to be a policy decision. Secondly, the analysis is based on a framework that was not vetted with Central Valley regulated agencies or stakeholders involved in the State Water Board Biological Integrity Project Stakeholder Advisory Group. This framework includes a classification procedure for identifying modified channels, which influenced the results without evaluating its implications for biointegrity impacts or management considerations.

As noted on page 68, the majority of modifications are made for a specific purpose, such as flood control. In most cases, the modifications must be maintained in order for the channel to continue to serve that purpose. The document also notes that those modifications are likely to impact biointegrity, "Recent studies show that bioassessment scores are typically depressed in modified channels (e.g., Mazor 2015, Mazor et al. 2018, Taniguchi-Quan et al. 2020, Dusterhoff et al. 2021), and that index scores may be less responsive to eutrophication stress in these systems." (page 74)

The process described to evaluate biointegrity thresholds in modified channels in the Technical Foundation Report includes the following steps:

1. Create a definition of modified channels
2. Define a framework for determining if a channel is natural or modified
3. Develop a conceptual model for the impacts of channel modification on biointegrity
4. Develop a framework and criteria for evaluating if biointegrity thresholds based on reference conditions can be applied to modified channels
5. Conduct analysis of data from modified channels using the framework and criteria
6. Based on the analysis, draw conclusions about whether proposed biointegrity thresholds based on reference conditions are applicable to modified channels

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CASQA does not have specific comments on the proposed definition of modified channels and the framework for determining if a channel is natural or modified at this time. However, based on our members' experience in applying a similar definition and framework to waterbodies in a regulatory context, the framework is lacking in detail and does not address the numerous questions that arise when attempting to apply the framework in a regulatory context. For example, reaches are typically defined for regulatory purposes based on the Basin Plan reach definitions. Reaches in the technical report appear to be the assessment reach. Assessment reaches are typically 150 meters as compared to miles for many of the Basin Plan reaches. Within a Basin Plan reach, there may be a mix of channel modifications and natural segments. The framework does not provide any method for how to handle different characteristics within a Basin Plan reach or the spatial applicability of a given score.

Similarly, CASQA is generally supportive of the conceptual model that was used to define potential impacts of channel modification and appreciates that necessary operations and maintenance activities to prevent flood control are included. However, all of the examples provided in the conceptual model are for streambed hardening, even though the Report acknowledges that other types of modifications create stressors that can impact the ecosystem. Additionally, while operations and maintenance activities are included in the conceptual model, the analysis does not include an evaluation of the potential impact of these activities even though they are necessary to maintain flood control protection. The conceptual model and associated discussion do not provide any detail on the impacts of different types of modifications, if some categories of modifications are more or less likely to impact the biological community, or the ability to mitigate the impacts of the modifications through measures other than removing the channel modifications.

The Report does not indicate if the conceptual model was used to develop the modified channel categories, even though they were utilized for the subsequent analyses and report conclusions. As a result, the Report lacks a linkage between the conclusions and the potential impacts on beneficial uses. The lack of detail in the framework and conceptual model led to an incomplete characterization of waterbody segments and oversimplified waterbody groupings that may have influenced the conclusions of the analysis (see discussion in comments #5 and #6).

CASQA has significant concerns with the section, "Decision process for selecting biointegrity indicators for classes of modified streams." This section of the Technical Foundation Report includes numerous decisions and proposals that are policy based, not technical findings. CASQA recommends the criteria in Table 14 and recommended usage categories be removed. While the Report includes statements that the usage categories are not intended to identify specific policy decisions, there are multiple examples where this type of technical work is being used for regulatory purposes once it is published (e.g., 303(d) listings process). As a result, anything that includes a policy framework or decision should not be included in the Report. Specific issues with this section are discussed in Comments #4, #5 and #6.

Additional concerns involve the methods used to categorize and sort data for the analysis in Part 2 of the Report. Refinement of the modified channel categories, along with corresponding data evaluation, could impact the conclusions drawn in the Report. Comment #5 contains five questions that should be considered prior to making policy decisions or evaluating possible management actions. The potential implications of failing to address these questions is further discussed in Comment #5.

CASQA Recommendation:

- *Report Modification - Remove the criteria in Table 14, recommended usage categories, and the conclusions based on these criteria.*

COMMENT #4: THE TECHNICAL BASIS FOR THE CRITERIA IN TABLE 14 IS NOT PROVIDED.

Table 14 in the Technical Foundation Report establishes criteria used to select biointegrity measures for each class of modified channels. Based on the usage categories presented after the table and the way the usage categories are used in the rest of the Report, the criteria are effectively used to determine whether reference-based thresholds are

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appropriate for modified channels. However, the criteria are effectively policy decisions. There is no technical bases provided for the criteria.

The first factor the Report evaluates is: “High score attainability: Is there evidence that high bioassessment index scores are attainable in the modified channel class?” The “high score attainability” evaluates whether 10% or more of the data (in a given modified channel classification) is greater than the 10th percentile of reference sites. The Report does not provide sufficient evidence to indicate the ‘10th percentile of reference sites’ is an appropriate threshold that can be applied across all modified channel classifications. Additionally, the selection of 10% as the percentage of sites that need to attain a specified threshold is arbitrary rather than derived from a statistical or scientific methodology. No technical information is provided to support the selection of 10% as the criteria for the evaluation. Fundamentally, the criterion used to evaluate the first factor is not technical or scientific, but rather represents several embedded policy decisions.

For the second factor “Responsiveness: Is there evidence that the index responds to stress?” The criterion in Table 14 uses evidence of a significant linear relationship with $p < 0.1$ as the basis for determining that there is evidence of responsiveness. However, statistical significance is typically signified by $p < 0.05$ or the rationale for an alternative statistical threshold for significance is described. While CASQA understands that SCCWRP used this as a part of the study design, it would be helpful to understand the technical basis for using $p < 0.1$ as the criterion versus $p < 0.05$ and what the ramifications are for the findings.

Additionally, the evaluation of the second factor includes developing relationships between biointegrity and multiple stressors (e.g., total nitrogen, total phosphorus, chlorophyll-a, specific conductivity, temperature, and dissolved oxygen). In the analysis, the statistical significance of the relationships are different for each stressor evaluated. No criteria are provided to explain how the results of the analysis resulted in the conclusions when the level of significance differs between stressors. For example, in the responsiveness analysis for California Stream Condition Index (CSCI) in soft bottom channels with two hard sides, only two of the nine stressors evaluated had a significant relationship. No modified channel category had evidence of responsiveness for all of the stressors evaluated. However, the conclusion of the analysis was that the systems were responsive to stressors even if only two or three of the nine stressors showed a relationship. The text explains the lack of relationships between biointegrity and stressors found in the analysis by stating “The overall weakness of the responses to stress within classes of modified channels is unsurprising and should not be interpreted to mean that the stressor has no impact on biointegrity within these streams. The wedge-shaped relationships are evidence of a strong relationship: Index scores are low when the stress indicator levels are high, whereas scores are more variable (and sometimes high) when stress indicator levels are low.” If the lack of responsiveness is not unexpected, we question whether this criterion is appropriate for the evaluation. Further, an analysis of the responsiveness reference and natural waterbodies to stressors are not provided to allow a comparison and evaluation of the statements about the responsiveness in modified channels.

Finally, the criteria in Table 14 are used to recommend usage categories for the biological indices. The usage categories combine multiple considerations for the use of indices into one category. Consideration of whether a specific index can be used to assess a waterbody, the types of monitoring programs that should use the index in the waterbody, the uses of the monitoring data collected in the waterbody, and the appropriate thresholds to use in evaluating the biological integrity of a waterbody are all distinct issues that require separate evaluations. However, the usage categories combine them all together. As a result, it is challenging to separate recommendations and conclusions regarding whether or not an index is an appropriate assessment tool for a modified channel from a conclusion regarding whether different thresholds could be considered.

In addition, the language in this section is very confusing, making it challenging to understand how the usage categories are intended to be used. For example, criteria included in Table 14 are designed to select “biointegrity indicators measures for each class of modified channels.” The relationship between “biointegrity indicators measures” selected based on the criteria and the use of an index and assessment thresholds described in the usage categories is unclear. Additionally, it is unclear how the Table 14 criteria were used to determine the appropriateness

of using an index in a given waterbody or evaluate whether a class of modified channels can be monitored using the index. Both of these factors are described in the usage categories, but it is unclear how those determinations are made. The Report then states that the usage categories are “not intended to identify specific policy decisions that the Water Boards should make.” However, the usage categories are then included in Table 20 in Part 3 under the discussion of “Stream types where alternative thresholds may be useful”. Per Table 20, modified channels that have been placed in the “standard usage” category are determined to have no justification for calculation of alternative thresholds. Per Table 18, all modified channels with soft bottoms are in the standard usage category for CSCI. Therefore, the policy-based criteria in Table 14 and the usage categories are effectively being used to preclude consideration of alternatives to reference-based thresholds for CSCI in modified channels.

CASQA Recommendation:

- *Report Modification - Remove Table 14 and the associated usage suggestions resulting from those criteria.*
- *Report Modification - Remove Table 20 in Part 3 that is based on the usage classifications in this section.*

COMMENT #5: THE CATEGORIZATION OF MODIFIED CHANNELS REQUIRES MORE REFINEMENT AND INPUT BEFORE CONCLUSIONS ARE MADE BASED ON THE ANALYSIS

CASQA has been working closely with our member agencies to understand the types of modifications made to waterbodies, the purpose of the modifications, and the associated operations and maintenance requirements needed so that those modifications can serve their intended purpose, which is generally for flood control. Through this process, our members have identified numerous challenges with evaluating and classifying modified channels in a consistent manner across data sources in a way that reflects the potential impacts on biological integrity as well as the potential for management actions to improve biological integrity scores.

Based on an initial review of the data provided by SCCWRP, the categorization of modified channels requires more consideration and evaluation before conclusions can be drawn about the attainability of reference conditions in modified channels. Some examples of the concerns with the categorization are as follows:

1. The system for classifying modified channels relies on field observations collected at the time of bioassessment sample collection. The field observations are limited to a small reach and only consider features that can be observed in the field. Additional considerations, such as channel use and history, should be considered.
2. The dataset provided includes a “Channel classification estimated by analysis of physical habitat data.”¹¹ This classification column can differ significantly from the classification based on observations that were used in the analysis. Thirty-eight sites classified as “modified” in the data analysis are classified as “natural” based on the analysis of physical habitat data. Eleven of those thirty-eight sites had CSCI scores >0.79 representing over 25% of the high scoring modified channels identified in the Technical Report.
3. The vast majority of the monitoring sites in the dataset (over 1,000 sites) have not yet been classified. As a result, conclusions are based on a small sampling of sites (197 modified channels) without evaluating the possibility of identifying additional modified channels to strengthen the analysis.
4. The conceptual model of potential, beneficial use impacts is not directly linked to the classification process. As a result, the analysis is based strictly on the channel engineering records and does not consider the likelihood the modification could impact biointegrity scores. For example, a waterbody modification that maintains a wide channel allowing the stream to maintain a more natural watercourse is classified the same as a narrow channel with concrete banks and a soft bottom. But these different channel conditions are likely

¹¹ Definition in DataDictionary tab located in spreadsheet Data sets used in each analysis_final.xls located on the github data repository link in the Technical Report.

to have different impacts on the CSCI score. To demonstrate this point visually, Google Earth images of the range of modifications that are included in the same waterbody classification are included as **Attachment 1**.

5. The categorization process did not evaluate whether or not modifications that exist outside the immediate sampling site was a factor that should be considered in determining the classifications. Some of these factors, such as the length of the channel modification and upstream channel modifications may have significant impacts on biological integrity that would warrant consideration when grouping sites together.
6. The ability of a specific modified channel to attain reference-based thresholds without removing the modifications requires a more refined and inclusive approach to classifying waterbodies for analysis. The analysis provided is insufficient to draw conclusions regarding the potential of all modified channels to attain reference-based thresholds.

CASQA Recommendation:

- *Report Cover Letter - Initiate a stakeholder process to (1) gather additional information on modified channels and (2) characterize channels and develop a more informed and applicable approach to group modified channels for analysis. Based on the information developed in this stakeholder process, incorporate consideration of the likely impacts of different types of modifications on biological integrity to develop the final groupings for analysis.*

COMMENT #6: SECTION ON DECISION PROCESS FOR SELECTING BIOINTEGRITY INDICATORS FOR SPECIFIC SITES¹² SHOULD BE INCORPORATED INTO THE OVERALL PROCESS FOR ANALYZING ALL MODIFIED CHANNELS

The Report includes a decision process for selecting biointegrity indicators for specific sites on pages 95 and 96. Based on the approach shown in Figure 40, it appears that the process is only intended to apply to modified channels that are not in the “standard usage” category. However, the decision process includes considerations that are critical to evaluating the use of thresholds in all modified channels. In particular, the approach recommends consideration of the level of development in the drainage area to the site. The level of development is a critical factor that should be incorporated into the framework for determining the appropriate biointegrity thresholds for all waterbodies. As shown in Figure 41 in the Report, the landcover in a watershed influences the biological conditions in modified channels. The approach in this section proposes the use of 90% natural landcover as a threshold for determining if a site has an undeveloped watershed and proposes consideration of alternatives to reference-based thresholds for sites that have less than 90% natural landcover. CASQA supports having separate approaches to evaluating modified channels that have undeveloped watersheds from those that are more developed. CASQA recommends that the modified channel classification and analysis in Part 2 of the report be conducted separately for modified channels with undeveloped watersheds and modified channels in developed watersheds.

Figure 1: Biointegrity Scores in Modified Channels in California, contains the map of modified channels with a CSCI score of 0.79, where those with a higher score are shown in green, and sites with a lower score are shown in red. No high scoring sites labeled in the Report as modified channels are located in the Central Valley or Bay Area¹³. Conversely, Figure 2: Biointegrity Scores in Southern California Modified Channels, shows a zoomed-in areal map of sites in Southern California juxtaposed to land uses. Within Figure 2, 15 of the 31 high-scoring sites (in green) are located upstream of agricultural and urban land uses in areas primarily draining open space. SCCWRP’s datafile¹⁴ includes a land use column with the categories urban, agriculture, forest, and “other”. Twenty-one of the high-scoring sites are classified as “other”, indicating that the primary surrounding land use is not urban or agriculture.

¹² Technical Foundation Report, starting at Page 95.

¹³ Data obtained from https://github.com/SCCWRP/ModifiedChannelThresholds/raw/main/inst/extdata/Data%20sets%20used%20in%20each%20analysis_final.xlsx. Values shown are the highest for each site if multiple values were found in the datafile. Channel classification was taken from the channel engineering tab, class_do column. The map does not include sites in the datafile classified as “hardened”, “natural”, or NA.

¹⁴ Part_2_combined_df_withdata.xls

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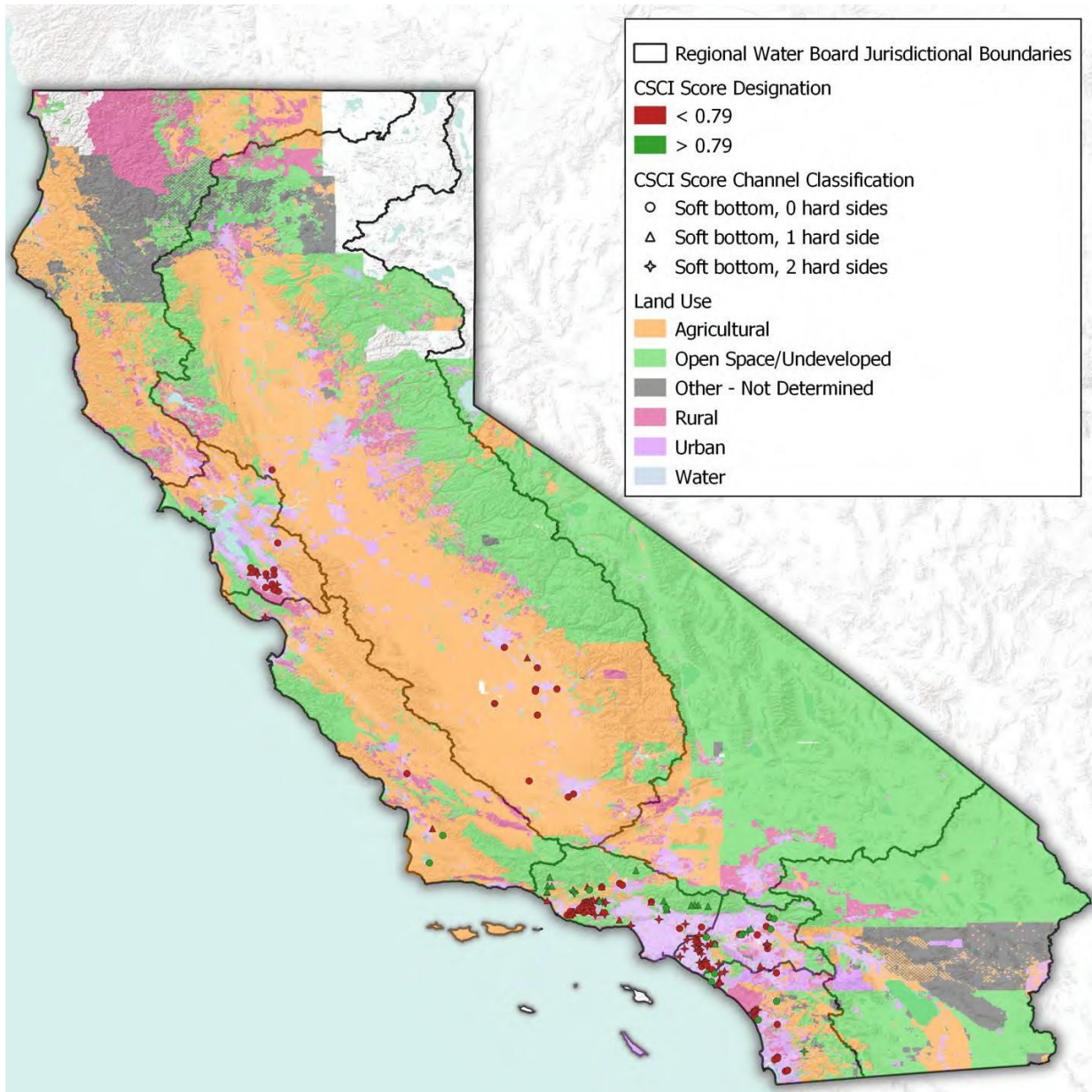


Figure 1. Biointegrity Scores in Modified Channels in California

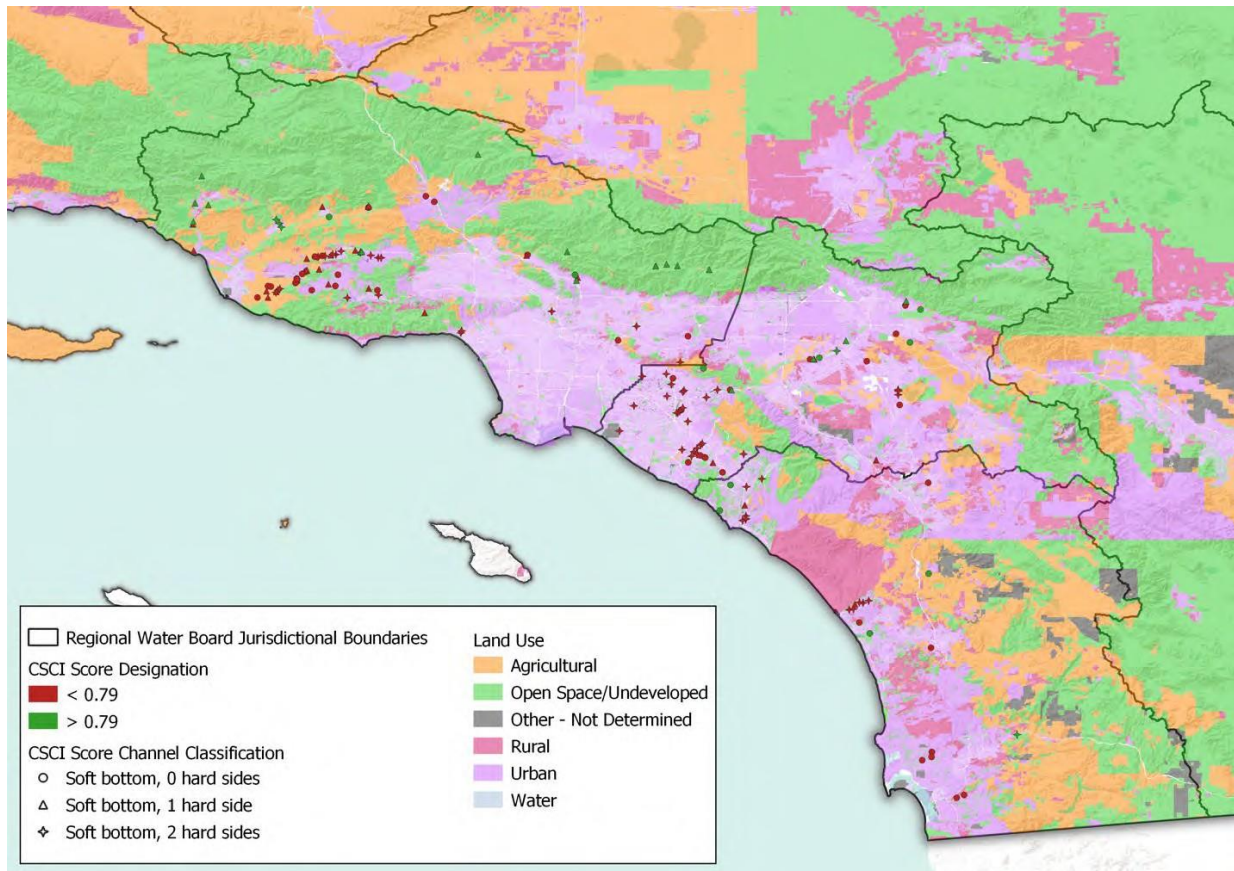


Figure 2. Biointegrity Scores in Southern California Modified Channels

Multiple sites included in the data analysis for modified channels are located in areas with a significant amount of natural landcover. CASQA supports excluding waterbodies with significant natural landcover from alternative uses of the CSCI score, but requests that additional analysis on modified channels be conducted without the sites that are primarily located in natural areas. Additionally, CASQA agrees with including a part of the analysis framework that acknowledges that high-scoring sites should not be considered for alternative thresholds.

Additional assessments need to be completed to develop waterbody classifications prior to making any conclusions about the appropriateness of applying a reference reach based biointegrity threshold for modified channels. The revised classification process should consider the surrounding land use and remove sites located in primarily natural waterbodies.

CASQA Recommendation:

- *Report Modification - Rerun the analysis after removing modified channels that are located in primarily natural watersheds.*

COMMENT #7: THE TECHNICAL FOUNDATION REPORT THRESHOLD CALCULATIONS MINIMIZE THE BEST-ATTAINABLE THRESHOLD CALCULATION APPROACH AND OVEREMPHASIZE THRESHOLD CALCULATION APPROACHES THAT ARE BASED ON ASSUMED RELATIONSHIPS BETWEEN EUTROPHICATION AND BIOINTEGRITY.

Part 3 of the report describes four potential ways to develop thresholds for the waterbodies covered by the study. While four approaches are described, potential thresholds are only shown for three of the approaches. The approach labeled “Best-attainable thresholds” is defined as, “the theoretical best state a reach can achieve, given appropriate management within long-term constraints that are unlikely to change in the near future.” As part of the SAG, CASQA consistently advocated for the consideration of thresholds grounded in what is realistically achievable and emphasized the importance of incorporation and evaluating the mechanisms by which these thresholds could be attained. This consideration is especially critical in modified channels where the actions necessary to attain a prescribed biointegrity threshold could compromise the necessary flood control purposes of the channel.

While we appreciate that a discussion of best-attainable thresholds is included in the Technical Foundation Report, CASQA requests the Report include an analysis of best-attainable thresholds that is equivalent to the analysis provided for the other three threshold calculation approaches. While best-attainable thresholds may be site-specific, it may be possible to develop standard assessment models similar to those developed for other threshold approaches. Standardization should include consideration of different categories of waterbodies. CASQA and other stakeholders have offered, on multiple occasions, to work with the State Water Board and their technical consultants to develop approaches for calculating best-attainable thresholds. We ask that this report not be finalized until this approach is at least developed for a case study waterbody to demonstrate how best-attainable thresholds should be calculated. We also request that this approach be clearly identified as a valid scientific approach to setting thresholds that could be used in lieu of the other thresholds presented in this report.

CASQA is also concerned with the emphasis on the response model thresholds that were developed based on the relationship between eutrophication and biointegrity indices. Biointegrity scores can be impacted by numerous factors, including water quality and channel modifications, as discussed in previous comments. The conceptual model presented in Part 2 of the Report discusses the numerous stressors that impact biointegrity. However, throughout the Report, eutrophication indicators are generally the only stressor analyzed. Eutrophication indicators are used in the analysis to determine whether modified channels met the responsiveness criteria in Table 14 in Part 2 and the analysis of the bioassessment tools in Part 1. Additionally, the response model approach to threshold calculations in Part 3 is based on an assumed relationship between biointegrity and eutrophication indicators. As stated on page 108, “we calculated continuous models ... to predict index scores from increasing eutrophication stress.” However, that same paragraph states that calibration datasets were not limited to different stream classes because “relationships between biointegrity and stress are weakened in many modified channel classes (Part 2 of this report).” The development of response model thresholds based solely on eutrophication relationships without consideration of thresholds based on other stressors does not recognize the complexity of stressors, particularly in modified channels, that could be impacting scores. The development of a web-based tool for calculating these response model thresholds further emphasizes a focus on the relationship between eutrophication and biointegrity that may not be warranted in all waterbodies, while also minimizing the consideration of relationships with other stressors. The tool also implies significant resources were put into developing this model, while none were put into developing a model for best-attainable thresholds.

CASQA Recommendation:

- *Report Modification - Include a case study on developing best-attainable thresholds and recognize this approach to setting thresholds as an equally scientifically-valid approach to the other approaches discussed in the report.*
- *Report Modification - Revise the Report to recognize the importance of stressors other than nutrients on biointegrity scores.*

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- *Report Modification - Discuss the complex interactions between stressors and how they could influence the proposed biointegrity thresholds.*

Thank you again for the opportunity to comment on the Technical Foundation Report. If you have any questions, please contact me at (310) 462-4939 or karen.cowan@casqa.org.

Sincerely,



Karen Cowan, Executive Director
California Stormwater Quality Association

Attachments:

Attachment 1 – Google Earth Images of Sites in Each of the Modified Channel Categories

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

Attachment 1. Google Earth Images of Sites in Each of the Modified Channel Categories

Soft Bottom, 2 Hard Sides

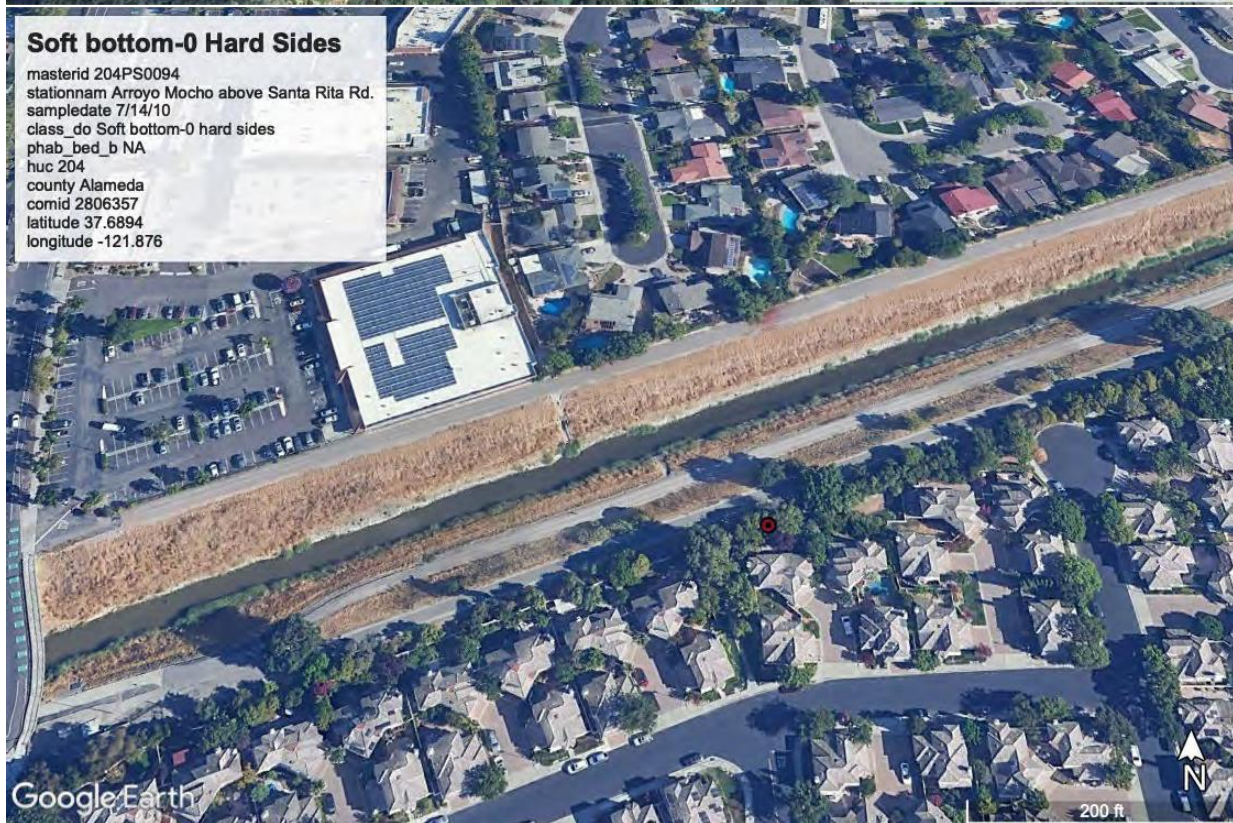
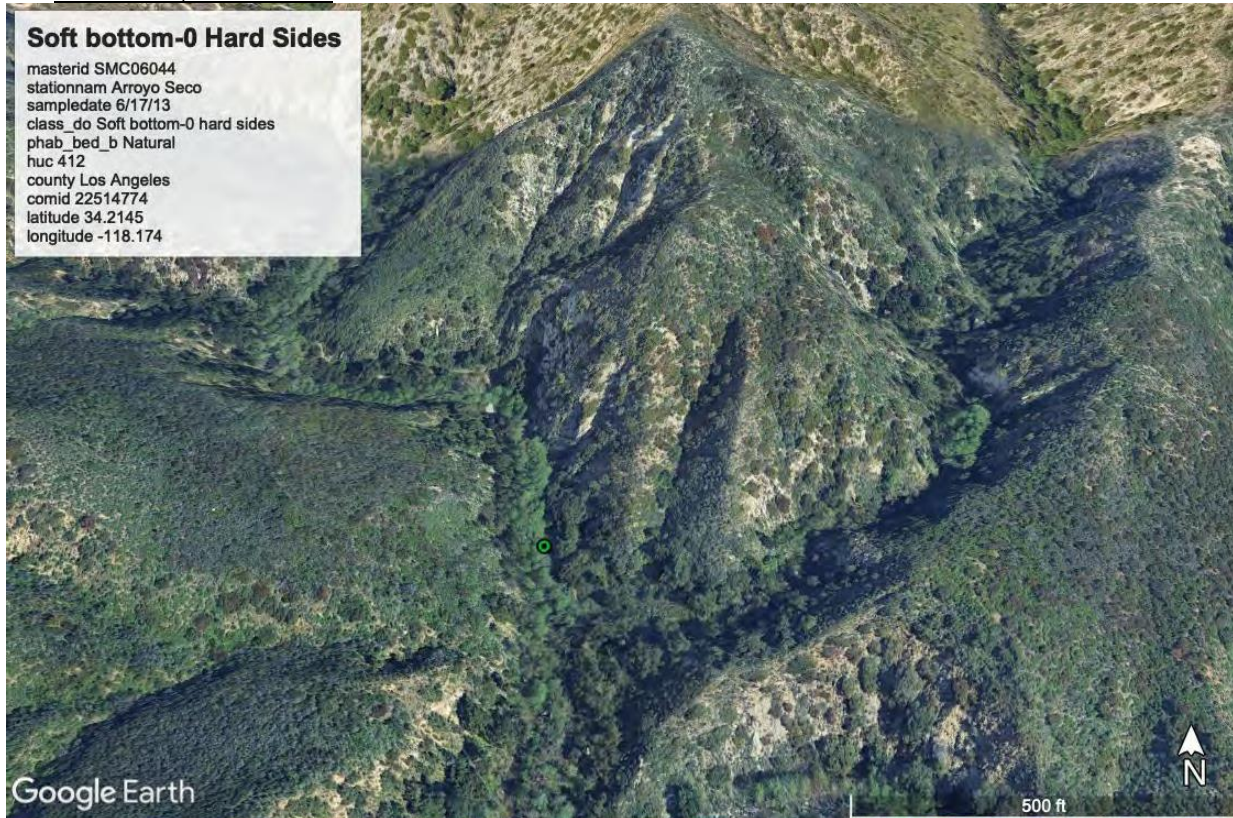


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Soft Bottom, 1 Hard Side



Soft Bottom, 0 Hard Sides



**Scheduled Meetings and Deliverables
February 2025 – April 2025**

February 2025

4	SCVURPPP Trash AHTG 1:00 pm – 3:00 pm	Zoom Meeting
6	SCVURPPP Information Management AHTG 10:00 am – 11:30 pm	Zoom Meeting
7	WMI – Zero Litter Initiative Steering Committee 9:00 am – 10:00 am	Zoom Meeting
10	BAMSC Regional Monitoring Coalition (RMC) Work Group 1:00 pm – 3:00 pm	MS Teams Meeting
18	SCVURPPP Trash AHTG 1:00 pm – 3:00 pm	Zoom Meeting
19	SCVURPPP Pesticides AHTG 9:00 pm – 10:30 pm	Zoom Meeting
20	SCVURPPP Management Committee 9:30 am – 11:00 am <ul style="list-style-type: none"> • Approval – Final Draft FY 2024-25 Annual Report Format • Approval – Data Sharing Agreement with DRG 	Zoom Meeting
26	SCVURPPP Unsheltered Homeless AHTG 1:30 pm – 3:30 pm	Zoom Meeting
27	BAMS Collaborative Steering Committee Internal Portion – 9:30 am – 12:00 pm External Portion - 1:00 pm – 3:00 pm	MS Teams Meeting

**Scheduled Meetings and Deliverables
February 2025 – April 2025**

March 2025

4	SCVURPPP Monitoring AHTG Meeting 1:30 pm – 3:30 pm	MS Teams Meeting
5	BAMSC Monitoring and Pollutants of Concern (MPC) Subcommittee 10:00 am – 3:30 pm	MS Teams Meeting
6	<p>SCVURPPP Rural Roads Workshop 9:00 am – 11:30 am</p> <p>SCVURPPP Information Management AHTG 10:00 am – 11:30 pm</p> <p>SCVURPPP Long Term GSI Work Group 1:00 pm – 2:30 pm</p> <p>SCVURPPP WEO AHTG Meeting 2:00 pm – 4:00 pm</p>	<p>Hybrid: Valley Water Board Room, 5750 Almaden Expressway, San Jose/ Zoom Meeting</p> <p>Zoom Meeting</p> <p>MS Teams Meeting</p> <p>Zoom Meeting</p>
7	WMI – Zero Litter Initiative Steering Committee 9:00 am – 10:00 am	Zoom Meeting
10	SCVURPPP POC AHTG Meeting 1:00 pm – 3:00 pm	MS Teams Meeting
18	SCVURPPP Trash AHTG 1:00 pm – 3:00 pm	Zoom Meeting
20	<p>SCVURPPP Management Committee 9:30 am – 11:00 am</p> <ul style="list-style-type: none"> • Approval – Water Year 2024 Urban Creeks Monitoring Report & Electronic Data Submittal • Approval - FY 2025-26 Program Work Plan • Approval - FY 2025-26 Program Manager Notice to Proceed 	Zoom Meeting
27	BAMS Collaborative Steering Committee Internal Portion – 9:30 am – 12:00 pm External Portion - 1:00 pm – 3:00 pm	MS Teams Meeting

**Scheduled Meetings and Deliverables
February 2025 – April 2025**

April 2025

2	BAMSC Regional Monitoring Coalition (RMC) Work Group 10:00 am – 12:00 pm	MS Teams Meeting
3	Information Management AHTG 10:00 am – 11:30am	Zoom Meeting
4	WMI – Zero Litter Initiative Steering Committee 9:00 am – 10:00 am	Zoom Meeting
15	Trash AHTG 1:00pm – 3:00pm	Zoom Meeting
17	Management Committee 9:00am – 10:00am <ul style="list-style-type: none"> • Acceptance - Draft FY 2024-25 Program Manager Mid-Year Self-Audit Report CASQA Seminar – Stormwater Funding 10:00am – 3:00pm	Zoom Meeting Virtual Meeting
22	BAMS Collaborative Trash Subcommittee Internal Portion – 9:30 am – 10:30 pm External Portion - 10:30 pm – 12:00 pm	MS Teams Meeting
24	BAMS Collaborative Steering Committee Internal Portion – 9:30 am – 12:00 pm External Portion - 1:00 pm – 3:00 pm	MS Teams Meeting
29	C.3/GSI Workshop: LID and GSI Design and Maintenance 9:00 am – 3:00 pm	In-Person: Campbell Community Center

Anticipated Action Items for Future SCVURPPP Management Committee Meetings

MC Meeting	Action Item(s)
May 2025	TBD
June 2025	TBD
July 2025	TBD
August 2025	Draft Long Term GSI Technical Working Group Summary and Recommendations
September 2025	Draft FY 2024-25 Program Annual Report