

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

March 20, 2025 Meeting

MATERIALS FOR INFORMATION

II. March 20, 2025 Agenda

III. February 20, 2025 Meeting Minutes

IV. February 20, 2025 Action Items

VIII. MRP Implementation

1. Memorandum to Management Committee, from Program Staff, re: Management Committee Briefing on Priority Items, March 2025.
2. Highlights of BAMSC Committee and Subcommittee Meetings, February – March, 2025.
3. Pesticides Ad Hoc Task Group Meeting Summary, February 19, 2025.
4. Unsheltered Homeless Ad Hoc Task Group Meeting Summary, February 26, 2025.
5. Watershed Education and Outreach Ad Hoc Task Group Meeting Summary, March 6, 2025.
6. Special Management Committee Meeting Summary, March 7, 2025.

Other Items

1. Letter to Kelly Rodman, State Water Resources Control Board, from Karen Cowan, Executive Director, CASQA, re: Proposed Urban Stormwater Infiltration Water Quality Control Policy, February 25, 2025.
2. Letter to Christine Bergeron, Environmental Protection Agency, from Karen Cowan, Executive Director, CASQA, re: Comparison of Aquatic Life Protective Values Developed for Pesticides Under the FIFRA and the CWA. Docket ID Number: EPA-HQ-OW-2023-0107, March 3, 2025.
3. MC Calendar, March – May 2025.



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

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AGENDA

MANAGEMENT COMMITTEE MEETING

March 20, 2025, 9:00 am – 10:30 am

Note change in start time

Hybrid In-Person/Zoom Meeting¹

Sycamore Conference Room, 3rd Floor, City Hall, 456 W. Olive Ave., Sunnyvale

- 9:00 I. Management Committee Meeting Call to Order/Introductions**
- II. Additions or Revisions to Agenda; Announcements**
- III. Approval of Minutes (February 20, 2025 meeting)**
- IV. Review of Action Items from Last Meeting**
- 9:10 V. Time Open for Public Comment on Any Subject Not on Agenda (2 minutes)**
- 9:15 VI. Regional Water Board Staff Comments**
- VII. Program Business**
- 9:25 A. Program Management**
 - 1. **Action Item:** Water Year 2024 Urban Creeks Monitoring Report and Electronic Data Submittal – *request for approval and authorization for the Program Manager to submit to the Regional Water Board on behalf of all SCVURPPP Co-permittees.*
 - 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.*
- 9:40 B. Program Budget**
 - 1. **Action Item:** FY 2025-26 Program Work Plan – *request for approval.*
- 9:45 C. Program Manager’s Report**
 - 1. BAMS Collaborative Update – *information.*
 - 2. CASQA 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.

3. Grants Update – *information*.
4. Legislative Update – *information*.

VIII. MRP Implementation

10:00 A. New Development and Redevelopment

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

10:05 B. Trash Controls & Unsheltered Homeless

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

10:10 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

10:15 D. Outreach Activities

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

10:20 E. Other Permit-Related Activities

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

10:25 IX. Other Business

1. External Meeting Summaries – *questions on materials provided prior to the meeting*.
2. Miscellaneous – *information from MC members*.
3. AHTG Status Table – *updates requested*.
4. Planned Agenda Items for Future MC Meetings – *update*.

10:30 X. Adjourn

10:45-12:00 Presentation – Water Year 2024 Urban Creeks Monitoring Report (Chris Sommers)



**MANAGEMENT COMMITTEE MEETING
MINUTES**

February 20, 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 and members of the public introduced themselves.

II. ADDITIONS OR REVISIONS TO THE AGENDA; ANNOUNCEMENTS

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

- Chris Sommers (Program staff) met with Alexis Strauss (Water Board Chair) and Eileen White (Executive Officer, Water Board) to discuss Permittee concerns with MRP requirements.
- Chris reminded the MC to review the email from the Program's Counsel about unfunded mandates and discuss next steps internally. A meeting with the Program Counsel can be scheduled, if needed.

III. APPROVAL OF MINUTES

Motion: Rajani Nair (San José) moved to approve the minutes of the January 16, 2025 MC meeting. **Second:** Harun Musaefendic (Los Altos). **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 Co-permittee POTW agencies (San Jose and Palo Alto) and report back to the AHTG and MC.) is in progress. Chris has reached out to Co-permittee POTW agency staff to discuss the RMP Fee. The RMP is partly funded via Federal grant and the funding status beyond 2025 is currently unclear.
- 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. A presentation was made to the Information Management AHTG on February 6, 2025, and it will be documented in the Work Plan and distributed soon.
- 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 April.
- 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. The MC recommended that instead of developing a tracking table, Program staff include a legislative update on the MC agenda each month.
- 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 April. The MC discussed this issue and recommended that the SCVURPPP IND/IDDE AHTG discuss support/guidance that could be provided to Co-permittees on responding to Water Board inquiries.
- 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 done. Program staff have discussed the display with the outreach consultant, and it will be further discussed at the WEO AHTG meeting on March 6, 2025.
 - Action item 12-24-7 (Prepare a proposed watershed stewardship collaboration work plan for FYs 2024-25 and 2025-26 and convene a special meeting to discuss the approach.) is in progress. Program staff are meeting with Grassroots Ecology staff tomorrow to discuss ways to collaborate on a watershed stewardship program. MC members interested in participating in this meeting should contact Jill Bicknell (Program staff).

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 prior to the March MC meeting.
- 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 complete. The meeting will be held on February 26, 2025.
- 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 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 complete. The meeting was held on February 19, 2025.

Action: Program staff will include a legislative update item on the MC agenda each month.

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

None.

VI. WATER BOARD STAFF COMMENTS

Water Board (WB) staff did not attend the meeting and no comments were submitted.

VII. PROGRAM BUSINESS

A. PROGRAM MANAGEMENT

1. Action Item: FY 2024-25 Annual Report Format

Vishakha Atre (Program staff) reported that the final draft FY 2024-25 Annual Report template was sent to the MC for review on January 29, 2025. No comments were received. All Countywide Programs will take actions to approve the template this month and the BAMSC Steering Committee will consider approving it on February 27, 2025. The template will be submitted to the WB Executive Officer by March 3, 2025.

Motion: Pam Boyle Rodriguez (Palo Alto) moved to approve the FY 2024-25 Annual Report forms and authorized the Program Manager to submit them to the Regional

Water Board via the BAMS Collaborative on behalf of all SCVURPPP Co-permittees.
Second: Colleen Trostle (Santa Clara). **Vote:** Motion passed unanimously.

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

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 discussed the data needs with County staff and their consultant and recommend signing a data sharing agreement with the 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. The MC discussed this data request and had some questions and concerns. It was recommended that the County and Davey Resource Group make a presentation to the MC explaining how the data will be used and displayed to the public. No action was taken.

B. PROGRAM BUDGET

1. Final FY 2025-26 Program Budget

Chris reported that the FY 2025-26 Program Budget has been finalized and will be posted to the members only portion of the Program's website for MC members to access. Program staff are developing the FY 2025-26 Work Plan which is based on the approved budget. The Work Plan will be sent to the MC in early March and approval will be requested at the March MC meeting.

C. PROGRAM MANAGER'S REPORT

1. BAMS Collaborative Update

At the BAMSC Steering Committee meeting on January 29, 2025, Keith Lichten (Water Board staff) shared slides about the proposed MRP 4.0 issuance schedule. Program staff will send the slides to the MC.

Chris reported that the BAMSC Steering Committee approved the project profiles for potential projects of regional benefit at its January meeting. SCVURPPP contributions to these projects are included in the approved FY 2025-26 Budget. The project profiles will be distributed to the MC.

2. CASQA Update

The next CASQA Quarterly Seminar will be held on April 17, 2025 from 10 am – 12 pm on the topic of Stormwater Funding. The MC meeting is on the same day and can be moved to a 9 am start, if desired. The MC agreed to adjust the time of the April MC meeting to allow attendance at the CASQA Seminar.

The 2025 CASQA Annual Conference will be held on September 15-17, 2025 in Pasadena.

3. Grants Update

The Bipartisan Infrastructure Law (BIL) FY 2025 San Francisco Bay Water Quality Improvement Fund (SFBWQIF) Notice of Funding Opportunity (NOFO) is no longer available. This funding opportunity was intended to support building climate resilience in the Bay Area's underserved communities. The SFBWQIF-funded PCBs TMDL project and the "Watching Our Watersheds" project will continue to be funded.

VIII. MRP IMPLEMENTATION

A. NEW DEVELOPMENT AND REDEVELOPMENT

Jill provided the following updates:

- The FY 2024-25 SCVURPPP C.3 workshop will be held at the Campbell Community Center on April 29, 2025. A registration flyer was distributed to the C3PO AHTG.
- Program staff received minor comments from the C3PO AHTG on the GSI details in Part 2 of the GSI Handbook.
- The January 27, 2025 C3PO AHTG meeting included an extended discussion on Alternative Compliance programs. A Work Group has been formed to continue the discussion.
- Program staff attended the State Water Resources Control Board's public workshop on the proposed Urban Stormwater Infiltration Policy. This workshop was held to obtain initial input on the scope and objectives for the proposed policy. CASQA is planning to submit a general comment letter. The draft Policy will not be available until late 2025.

B. TRASH CONTROLS AND UNSHELTERED HOMELESS

Chris provided the following updates:

- All OVTAs will be completed by the end of April/early May. This will ensure that adequate time is available to update the trash load reduction dashboard and the load reductions.
- Program staff are developing guidance on addressing WB staff's perspective on bioretention as full capture devices.
- The first meeting of the Unsheltered Homeless AHTG will be held on February 26, 2025.

C. MONITORING / POLLUTANTS OF CONCERN

Chris reported that both the outfall and receiving water trash monitoring are continuing for Water Year 2025. Trash monitoring is being conducted in coordination with the Trash Technical Advisory Group (TAG). The Trash 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. LID monitoring is ongoing. Program staff have started developing the FY 2024-25 Urban Creeks Monitoring Report (UCMR), which will be available for Co-permittee review in late February. The MC will be asked to approve the UCMR at its March meeting.

D. OUTREACH ACTIVITIES

Program staff is working with the Scripts Review Work Group to finalize the Youth Outreach Campaign concepts. A WEO AHTG meeting will be held on March 6, 2025.

E. OTHER PERMIT-RELATED ACTIVITIES

1. Cost Reporting

Jill reported that a Cost Reporting Work Group meeting will be held this afternoon 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.

2. Information Management

The Information/Asset Management Work AHTG will continue to meet on the first Thursday of every month. The next meeting will be held on March 6, 2025. Program staff are planning a Condition Assessment Training and looking for sites to conduct this training.

IX. OTHER BUSINESS

The March MC meeting will be a hybrid format, i.e., held in-person at Sunnyvale City Hall and via Zoom. A presentation on the Program's monitoring in Water Year 2024 (October 2023 - September 2024) will be held right after the MC meeting.

X. ADJOURN

The MC meeting adjourned at 11:00 am.



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

Meeting Attendance Record

DATE February 20, 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, Mary Morse

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

Zhenzhen Jiang

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

Julia Schmitt, Carollo Engineers

Shyamala Raveendran, Carollo Engineers

Bryn Evans, Craftwater

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

Action Items from February 20, 2025 MC Meeting

Action	Description	Responsibility	Due Date	Status	Comments
2-25-1	Include a legislative update on the MC agenda each month.	Program staff	March	Done	Added to the MC agenda

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	In progress	The Program Manager will send out an update on these discussions to the MC and Budget AHTG later in March.
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 . Work Plan will be provided in late March.
12-24-3	Set up an internal meeting later this FY to discuss proposed changes to the format of MRP reissuance meetings.	Program staff	TBD	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	Done	Replaced by Action Item 2-25-1
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	In progress	To be discussed with the IND/IDDE AHTG
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	April	In progress	Meeting held with Grassroots Ecology on 2/21/25. Awaiting their response regarding collaboration.

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	Link will be sent out prior to March MC meeting.
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.



**Santa Clara Valley
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MEMORANDUM

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

TO: Management Committee

FROM: Program Staff

DATE: March 14, 2025

SUBJECT: Management Committee (MC) Briefing on Priority Items

Program Management

- * Water Year (WY) 2024 Urban Creeks Monitoring Report (UCMR) and Electronic Data Submittal - MRP 3.0 Provision C.8 requires the submittal of the WY 2024 UCMR and electronic monitoring data to the Water Board (WB) by March 31, 2025. The UCMR includes the following sections/parts: LID effectiveness, trash (outfall and receiving waters), pesticides & toxicity, and pollutants of concern (POCs) (e.g., PCBs and mercury) monitoring. The Draft UCMR was distributed to the Monitoring AHTG on February 17th in the following share drive folder: [SCVURPPP WY 2024 UCMR for MC approval](#) and comments were due on March 7th. Program staff are finalizing the UCMR and will send the MC a link to the final version prior to the March 20th MC meeting, when the MC will consider approval of the report.
- * Draft FY 2025-26 Program Work Plan - The Draft FY 2025-26 Program Work Plan was provided to the MC for review on March 10th in the following share drive folder: [Program FY 2025-26 Work Plan](#). The Work Plan was developed consistent with the Program's FY 2025-26 approved budget and the level of effort represented by the budget items. Red text is used to indicate new FY 2025-26 tasks within the Work Plan sections, and a summary table of new MRP tasks and deliverables for FY 2025-26 is included in Appendix A of the Work Plan. Comments are due to Program staff by March 18th. The MC will be asked to approve the Work Plan at the March 20th MC meeting.
- * 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. At the February 20th MC meeting, the MC had concerns about the request and asked that the County and DRG attend a meeting to explain their use of the data and answer questions. A meeting was held on March 7th, and the MC representatives in attendance

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

recommended approval of the data sharing request. The MC will be asked to approve a data sharing agreement between DRG and EOA (on behalf of SCVURPPP) at the March 20th MC meeting. Information related to this action item can be found in the following share drive folder: [County-DRG Data Sharing Agreement](#).

- 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.
- Rural Roads Workshop - The SCVURPPP Rural Roads Workshop was held on March 6th, 9:00 – 11:30am, at the Valley Water Board Room, 5750 Almaden Expressway, San Jose. The workshop included a video of Best Management Practices for rural road construction and maintenance, including reviewing concepts of improved road drainage and stream crossing upgrading, a panel discussion on identifying and prioritizing rural road maintenance and inspection programs with CalFire and Valley Water staff, and presentations on BMPs to prevent erosion and manage sediment and requirements for MRP compliance. The workshop evaluation summary is included in the MC Information Packet.

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. Comments on the details are currently being reviewed and addressed. Key updates to the details will be presented at the C.3/GSI workshop.
- 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 next AHTG meeting will be March 19th from 10:00am – 12:00pm via Zoom. Program staff emailed the Scripts Work Group the tallow bin BMP fact sheet for review. Program staff revised the fact sheet based on comments received and emailed the Final Draft to the AHTG for review. 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. The letter was revised based on comments received and the Final Draft was emailed to the AHTG.

Program staff emailed a draft MS4 Map Update Plan and Schedule Template for review and comment by January 13th. Comments received will be discussed at the next meeting.

- 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.

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 were due February 18th but there was a request to extend the comment deadline. Program staff are reviewing the comments received by February 28th.

Watershed Education and Outreach (C.7)

- Watershed Watch Campaign – Program staff worked with Gigantic Idea Studio to develop the second video for the youth outreach campaign. This video focuses on litter prevention. The video was finalized after feedback from the Scripts Review Work Group. The “Dirty Jobs” video, featuring Palo Alto maintenance staff, is posted [here](#). The “Pick up Litter” video is posted [here](#). Program staff worked with Gigantic Idea Studio to develop the FY 2024-25 Watershed Watch Campaign Mid-Year Report and distributed it to the WEO AHTG for review.
- List of Schools for FY 2025-26 – Program staff developed a list of schools for ZunZun to contact in FY 2025-26 and sent it to the Schools and Youth Outreach Work Group for review. The final list was sent to ZunZun.
- WEO AHTG – The WEO AHTG meeting was held on March 6, 2025. The meeting summary is included in the MC Information Packet.

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 has successfully sampled five storm events across the 2 sites in WY 2025 to date. 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.

The next annual LID Monitoring Technical Advisory Group (TAG) meeting is currently planned for May 9th from 1-4 pm. The meeting will focus on updating the TAG on the outcomes of Year 2 monitoring, and further review and discussion of the data collected during Year 1.

- 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 (Coyote and Stevens) opened during the monitoring events and the samples were lost. Additional events at the two sites will be completed prior to the end of the wet weather season to fully address the MRP requirement. Trash receiving water monitoring has begun and samples have been collected during multiple events at the two sites in Santa Clara County. Additional samples are planned for collection during subsequent events this WY. Due to back-ordered equipment, receiving water monitoring was delayed for WY 2025, but assuming qualifying storm events occur in March and 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 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 is focused on the sites identified in the SCVURPPP Old Industrial Area Control Measure Plan and discussed with the POC AHTG. Up to 3 potential stormwater sampling locations have been identified, and will be monitored this water year if adequate storm events occur in March or April. Planning for additional sediment samples at sites across Santa Clara Valley is currently ongoing. Program staff anticipate conducting additional sediment sampling starting in May 2025. 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 Monitoring AHTG met on March 4, 2025, 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)

- OWOW Program – Program staff have received the print order of fact sheets from CASQA and will begin the second round of store visits in March.
- Pesticides Source Control Effectiveness Evaluation (PSCEE) Report – The first meeting of the Pesticides AHTG was held on February 19, 2025. The goal of the meeting was to discuss the development of the PSCEE Report. The meeting summary is included in the MC Information Packet.

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:

- 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.
- 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.
- 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 by March 21st.

- Trash AHTG Meetings – The Trash AHTG typically meets on the 3rd Tuesday of the month. The last meeting was held on February 18th. The next meeting is scheduled for March 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 April 4, 2025.

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

- PCB/Hg Source Property/Area Identification Studies
 - **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 in September 2024. Program staff continued working with individual Co-permittees to plan and implement source investigations during FY 23-24, and have continued to plan and conduct source investigations during FY 24-25, consistent with the plans described in the OICMP. 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. Program Staff are currently implementing the Plan in coordination with Co-permittees.
- 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 in mid- March. 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 January 2025 and the TRC last met in December. The Steering Committee will next meet in April 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 March 10th to discuss the Draft Work Plan for the development of the updated mercury and PCBs Control Measure Plan and Reasonable Assurance Analysis (RAA Plan) that is due to the Water Board by March 31, 2026. The next POC AHTG meeting will likely be held in the Fall (date TBD) to discuss progress on developing the updated RAA Plan.

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 was held on February 26, 2025. The meeting summary is included in the MC Information Packet.

Cost Reporting (C.20)

- Cost Reporting Work Group - A Work Group meeting was held on February 20th 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. The next Cost Reporting Work Group meeting is scheduled for March 20th at 1:00-2:30 pm via Zoom.

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 March 6th meeting, the AHTG discussed the approach for developing cost projections for Asset Management Plans, received an overview of updates to the Asset Management SharePoint page, and received an update on development of the broader Information Management Work Plan for FYs 2024-25 and 2025-26. The next Information Management AHTG meeting will be held on April 3, 2025.



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Highlights of Bay Area Municipal Stormwater (BAMS) Collaborative Steering Committee, Subcommittee and Work Group Meetings February – March 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 final draft FY 2024-25 Annual Report forms. The Co-Chairs will get Countywide Program Manager signatures and submit the forms to the Regional Water Board (RWB) by March 3, 2025.
- After feedback from Contra Costa permittees, the Steering Committee approved modifications to the project profile for PCBs in Building Demolition Updates in 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. One of the first steps will be to procure consultant assistance via an RFP process. The PMT had its first meeting and the RFP development is underway. 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 is beginning to develop the focused public outreach and education 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 April.
- 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. These alternative methods were discussed with the Trash Monitoring Technical Advisory Group (TAG). The Project Team will develop a memorandum describing the results of the literature review and will submit it to the BAMSC Steering Committee, MPC, and Trash Monitoring TAG for review and comment later in FY 2024-25.
- 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. A meeting poll was sent to the Task Force to schedule the next meeting for late March or early April.
- Asset Management Work Group – The group has not met since July and no meetings are currently planned.
- 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 is scheduled for March 26). Two internal meetings have been held to discuss the two-path approach and other topics.

- **Caltrans Update** (Wilfung Martono)

- Caltrans is currently working on cooperative agreements with Oakland and San Jose and looking for additional funding. Rebecca added that Caltrans is looking for opportunities for offsite mitigation for their Highway 37 improvement project and they are working with Solano County on a possible site. She asked BAMSC members to think about alternative compliance projects with Caltrans.

- **Collaboration with Regional Water Board Staff** (Keith Lichten and Rebecca Nordenholt)

- Rebecca introduced Ashraf Ali, the new RWB staff person focused on stormwater capture projects.
- The next quarterly Water Board Staff/Program Manager Coordination meeting will be held on April 4th, 10:30 am – 12:00 pm via Teams.
- FY 2024-25 Annual Report Forms – RWB staff indicated that they would provide comments within one month of submittal and that they will have suggestions for additional guidance based on their reviews of the FY 2023-24 Annual Reports. General comments on the FY 2023-24 Annual Reports will be sent to the Program Managers on February 28.
- MRP 4 Planning Process – Keith announced that there are information items related to C.3 and monitoring planned for the August Water Board meeting and that BAMSC members will be invited to contribute presentations. This is to help educate Water Board members in advance of MRP 4 reissuance.

Next Meeting – March 27, 2025

PIP Subcommittee

Chair – TBD

SCVURPPP representative – Vishakha Atre (SCVURPPP)

Next Meeting – TBD

Development Subcommittee – March 11, 2025

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)

External Meeting

- Rinta Perkins, Interim Program Manager for CCCWP, made a presentation on recent efforts to establish a Community Facilities District to support implementation of the CCCWP Regional Alternative Compliance Program.
- Members provided updates on the Long Term GSI Technical Working Group and the Trees in GSI Work Group and relevant items from the February BAMSC Steering Committee.
- The Subcommittee received an update from RWB staff on FY 23-24 Annual Report comments, the schedule for discussion of MRP 4 (kickoff meeting in October 2025), and the Water Board information item on C.3 planned for August 2025.
- The Subcommittee discussed topics for future meetings.

Internal Meeting

- The group discussed progress on the C.3.j numeric retrofit targets, related issues, and approaches that permittees have used to get private development to help generate non-regulated treated acres towards the targets.

Next Meeting – June 10, 2025 (meets quarterly)

Trash Subcommittee – No February or March Meeting

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).

Next Meeting – April 22, 2025 (meets quarterly)

Monitoring/POCs Subcommittee – March 5, 2025

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)

Internal Meeting:

- Attendees discussed ongoing regional coordination and planning efforts related to MRP 3.0, including the following topics:
 - Update on the status of the USEPA 2024 WQIF grant for PCBs TMDL Special Studies and timeline for next steps.
 - Planning for semi-annual RWB Staff Update meeting to be held in Spring 2025, including potential topics, attendees and schedule.

- C.8 monitoring (trash, LID, POC and receiving water limitations monitoring), including status updates and continued planning through the Regional Monitoring Coalition (RMC).
- C.11/12.c implementation, including discussion of ongoing implementation of old industrial area control measure plans.
- C.12.e Controlling PCBs from Bridges and Overpasses – discussion of draft BAMSC Guidance document that provides support for permittees on how to address PCBs-containing materials during bridge demolitions in the absence of a Caltrans specification. The draft document will be distributed for review/comment by Permittees in March.
- C.11/12.h Prepare Implementation Plan and Schedule to Achieve TMDL Wasteload Allocation (RAAs) – continued discussion of the requirements for the updated RAAs and planning for regional coordination, which includes a Regional Work Group to discuss key modeling assumptions and approaches.
- RMP updates, including discussion of upcoming work group meetings.

Main (External) Meeting:

- The Subcommittee received updates from WB staff on relevant topics and provided updates to WB staff on ongoing monitoring and POC projects.

Next Meeting – May 7, 2025 (meets bimonthly)



Pesticides Ad Hoc Task Group (AHTG)
Meeting Summary
February 19, 2025
9:00 – 10:00 am

Announcements

Vishakha Atre (Program staff) informed attendees that the Pesticides AHTG has been formed to discuss and develop the Pesticides Source Control Effectiveness Evaluation (PSCEE) Report that is due with the FY 24-25 Annual Report, as required by the Municipal Regional Permit (MRP).

Emily Kam (Sunnyvale) informed attendees that the City of Sunnyvale is interested in hiring an Integrated Pest Management (IPM) consultant to assess current practices and develop recommendations for creating a pesticide-free park. She asked attendees to recommend consultants for this task. Some attendees recommended that Emily contact Town of Windsor staff about the Town’s experience eliminating pesticide use at all Town properties.

PSCEE Report

Vishakha provided an overview of Provision C.9 requirements that will be evaluated in the PSCEE Report. She also provided an overview of the PSCEE Report that was submitted in 2019 to meet the requirements under the previous MRP. The 2025 Report will follow the same format. Program staff have started compiling Provision C.9 data from past Co-permittee Annual Reports. The collected data will be evaluated using the CASQA Effectiveness Evaluation methodology and summarized in the PSCEE Report. Data from the Program’s water quality monitoring program will also be included in the PSCEE Report.

The PSCEE Report will include a Co-permittee specific section that will discuss improvements made by each Co-permittee in implementing IPM and pesticide source control actions in the last five years, and one or more enhancements that each Co-permittee will focus on in the next permit term. Program staff will send an online survey to obtain Co-permittee specific information and summarize it in the Report. The survey will be sent mid-March and completed surveys will be due by the end of April. The AHTG agreed with this timeline.

The draft PSCEE Report will be sent to the AHTG for review in early June. The AHTG agreed to meet in June to provide feedback.

Action Items:

Program staff will send an online survey to Pesticide AHTG members and other Co-permittee staff for obtaining agency-specific pesticide source control information.

Next meeting: June 2025 (date TBD).

Meeting Attendance List

Meeting: Location: Date:	Pesticides AHTG Zoom 02/19/2025
Lori Baumgartner	Cupertino
Zach Wu	Mountain View
Chuck Quanz, Collen Trostle, Dale Seale	Santa Clara
Emily Kam	Sunnyvale
Kendra Boutros	Valley Water
Pia Lusk	WVSWA
Vishakha Atre, Claudia Mayo	SCVURPPP

Unsheltered Homeless Ad Hoc Task Group (AHTG)

Meeting Summary

February 26, 2025

1:30 – 2:30 pm

Announcements

Vishakha Atre (Program staff) informed the AHTG that the Unsheltered Homeless AHTG has been formed to discuss the following two Municipal Regional Permit (MRP) deliverables due with the Co-permittee FY 24-25 Annual Reports:

- Maps showing locations of unsheltered homeless populations in relation to storm drain inlets and/or surface water bodies. Maps were previously submitted with the FY 22-23 Annual Reports.
- Describe Best Management Practices (BMPs) implemented to address discharges associated with homelessness that impact water quality, evaluate effectiveness, and identify actions/changes to existing actions. This effectiveness evaluation was also previously submitted with the FY 22-23 Annual Reports.

Development of Maps

Program staff will develop the maps using data from the 2025 point-in-time (PIT) count conducted by the Santa Clara Office of Supportive Housing (County OSH) in January 2025. The PIT count is designed to meet the United States Department of Housing and Urban Development (HUD) requirements to apply for McKinney-Vento Homeless Assistance funds (also known as Continuum of Care funds) and provide data for local homeless system planning. Program staff will obtain location and count data at the census tract level from County OSH staff and overlay this data with MS4 system, water body, and jurisdiction boundary layers to create Co-permittee specific maps. The maps will be provided to Co-permittees to include in their FY 24-25 Annual Reports. Attendees discussed whether additional location and count data obtained by Co-permittees should be included on the maps. Program staff recommend including a description of the additional data collected by the Co-permittee in the narrative part of the Annual Report, and not on the maps.

BAMSC Regional BMP Report

Vishakha shared the BAMSC Regional BMP Report that was submitted with the FY 22-23 Program Annual Report as required by the permit. The BMP Report was developed by collecting information on BMPs being implemented by Permittees throughout the Bay Area. The BMPs are presented as fact sheets in the Report. The BMP fact sheets can be used by Co-permittees to implement and evaluate the effectiveness of local BMPs.

Effectiveness Evaluation

Similar to FY 22-23, Program staff will provide guidance within the FY 24-25 Annual Report form on reporting the effectiveness of BMPs. The guidance will include example BMPs and evaluation metrics. Program staff have summarized the BMPs reported in Co-permittee Annual Reports in FY 23-24 and the summary document will be distributed to the AHTG for internal use only. Attendees requested that the guidance clearly state that Co-permittees should delete the BMPs that do not apply to their agencies.

Action Items:

- Program staff post the Regional BMP Report and the compiled FY 22-23 Co-permittee BMP effectiveness evaluation data on the Program's Sharepoint folder and send a link to the AHTG.

Next Meeting: June 2025 (date TBD) to discuss maps and BMP effectiveness evaluation.

Meeting Attendance List

Meeting:	Unsheltered Homeless AHTG
Location:	Zoom
Date:	February 26, 2025, 1:30– 2:00 pm
Name	Agency
Lori Baumgartner	Cupertino
Riley Moffat	Cupertino
Nikole Reaksecker	San Jose
Alex Cushing	San Jose
Mary Morse	San Jose
Jamie Marcil	San Jose
Gaurav Kumarllemos	Santa Clara
Damaris Han	Santa Clara
Emma Hinojosa	Sunnyvale
James Downing	Valley Water
Kendra Boutros	Valley Water
Julie Schaer	WVSWA
Kristin Kerr	SCVURPPP
Vishakha Atre	SCVURPPP



Watershed Education and Outreach Ad Hoc Task Group (WEO AHTG)

Meeting Summary

March 6, 2025

2:00 pm – 4:00 pm

Watershed Watch Media Campaign (Campaign) Update

Lisa Duba (Gigantic Idea Studio) provided the following updates:

- The Campaign developed three new partnerships: SummerWinds nursery, Los Gatos Bird Watchers, and Santa Clara Valley Bird Alliance. All partners will promote the Watershed Watch website and content in their newsletters and social media.
- Filming is complete for two of the four reels being developed for the youth outreach campaign. The “Dirty Jobs” reel, featuring maintenance staff from the City of Palo Alto, has been posted and is receiving significant engagement. The “Pick-up Litter” reel is in the final round of editing and will be placed next week. The last two reels are in the planning stage and will be filmed soon. The final reels will be placed on the Watershed Watch YouTube channel and Instagram.
- Advertisements promoting the Green Gardener training ran in January and February.

Watershed Watch Display

Vishakha Atre (Program staff) informed the AHTG that based on feedback received, Program staff plan to update the current Watershed Watch event display panels. The display images and text will not be updated. She shared three display panel options with the AHTG and asked for their opinion. Attendees provided feedback and noted that almost all displays are hard to manage at outdoor events and will tear or fall in windy conditions. Program staff will continue to research display panel options and work with the Scripts Review Work Group to update the display in FY 25-26.

City of San José’s Campaign with the Sharks Team

Adele Halili (San José) updated the AHTG on the 2025 Sharks campaign. The bus back advertisements have started. There was an issue with posting the advertisements on Facebook, and San Jose staff are working to resolve it. Adele added that the City’s contract with the Sharks ice hockey team has ended, and they are deciding whether to continue the partnership or look for other partners. Some attendees recommended that the City consider partnering with the Earthquakes soccer team again. The Earthquakes have fewer restrictions on players posing with props (e.g., trash grabbers) and may also help reach a different audience. Adele will take this feedback back to San José’s communications team.

Santa Clara Valley Green Gardner Training

Vishakha informed the group that the Winter 2025 Green Gardener training was also cancelled due to low enrollment. The AHTG discussed reasons for low enrollment and suggested sending out a survey to past students to get input on ways to improve enrollment.

Watershed Watchers Program at the Don Edwards Wildlife Refuge (Refuge)

Sirena Lao (SFBWS) provided an update on recent Watershed Watchers Program (WWP) activities. Refuge staff hosted several public and stewardship programs including workshops, habitat restoration days, and planting for pollinators. Refuge staff present information at the local schools, San Jose City College, De Anza College, Homestead Highschool and Russo McEntee Academy. The Refuge is celebrating Earth Month in April and hosting several programs on-site. Sirena and other staff are available to make presentations at local schools, if needed. The school presentations are a good way to promote the WWP and attract new local audiences. Sirena added that Refuge staff are continuing to conduct surveys to collect information on attendees’

city/town of residence.

General PIP Updates

Vishakha and Kira O'Shelski (Program staff) provided the following updates:

- *ZunZun School Assemblies:* ZunZun has booked all 50 assemblies for FY 24-25. Program staff prepared the mid-year report summarizing teacher evaluations and sent it to the WEO AHTG for review. Program staff also prepared a draft list of schools for ZunZun to contact in FY 25-26 and sent it to the Schools and Youth Outreach Work Group for review. The final approved list was provided to ZunZun.
- *Our Water Our World (OWOW) Program:* A total of 24 local stores are currently participating in the OWOW program. The second round of store visits for FY 24-25 has started. CASQA's print run of the OWOW fact sheets is complete. Co-permittee orders will be ready for pick up in late March/early April.
- *Earth Day Poster Challenge:* A total of eight submissions have been received so far. The deadline for submissions is March 17, 2025, and winners will be announced on April 22, 2025.
- *Outreach Events:* The Watershed Watch booth will be at the following four events in April and May 2025: City of Sunnyvale's Earth Day (April 5), the City of Santa Clara's Earth and Arbor Day (April 10), City of Milpitas's Earth Day (April 12), and Saratoga Blossom Festival (May 17). A sign-up sheet has been sent to the WEO AHTG.
- *Outreach Materials:* The following outreach materials were recently reprinted: *You are the Solution* brochure in English, Spanish and Vietnamese, *Draining Pools and Spas* brochure, and the Watershed Watch backpacks. Program staff are contacting Co-permittee staff to pick up their orders.
- *Mercury in Fish:* Program staff are continuing to visit participating local stores to stock the "Guide to Eating Fish and Shellfish" brochures.

Co-permittee PIP Updates

- Valley Water staff have started planning the National River Cleanup Day being held on May 17, 2025.
- The City of Cupertino is hosting its Earth Day event on April 5, 2025.
- Pia Lusk (WVSWA) informed the AHTG that the West Valley Clean Water Authority is now called the West Valley Stormwater Authority. She asked attendees for guidance on updating the name of the Authority's Facebook page. Nick Ingram (Valley Water) offered to connect her with Valley Water's communications staff as Valley Water went through a name change a few years back. Pia also mentioned that the Town of Los Gatos will host its Spring into Green event on April 27, 2025.

Action Items

- Program staff will send links to the youth outreach campaign reels to the AHTG.

Next Meeting – TBD

Meeting Attendance List

Meeting:	WEO AHTG
Location:	Zoom
Date:	March 6, 2025, 2:00 – 4:00 pm
Name	Agency
Nicole Lee	City of Cupertino
Elise Sbarbori	City of Palo Alto
Tina Keegan	City of Palo Alto
Karen Manor	City of Santa Clara
Adele Halili	City of San José
Zhenzhen Jiang	County of Santa Clara
Joanna Kincaid	County of Santa Clara
Samantha Vergara	City of Milpitas
Nick Ingram	Valley Water
Pia Lusk	WVSWA
Sirena Lao	San Francisco Bay Wildlife Society (SFBWS)
Mary Deschene	San Francisco Bay Wildlife Society (SFBWS)
Lisa Duba	Gigantic Idea Studio
Vishakha Atre	SCVURPPP
Kira O’Shelski	SCVURPPP



**Special Management Committee Meeting
Discussion of GIS Data Request from Santa Clara County Office of Sustainability and
Resilience and Davey Resource Group**

**March 7, 2025
9:00 am – 10:00 am
Meeting Summary**

Introduction and Agenda Review

Participants introduced themselves and agreed on the agenda.

Presentation by County Office of Sustainability and Resilience and Davey Resource Group on the County's Urban Forestry Master Plan (UFMP) Project

Jasneet Sharma, Director of the County Office of Sustainability and Resilience, provided some background on the UFMP project. The County received a grant from CalFire to do a countywide urban forestry master plan. The project needs to be completed by December 2025. The weblink for the project is:

<https://sustainability.santaclaracounty.gov/ufmp>.

The work is being coordinated with the County Climate Collaborative and the Urban Forestry Alliance, which has been meeting for 3 years and includes involvement by City representatives and arborists. The link to the Urban Forestry Work Group which is overseeing the project is here:

<https://www.climatecollaborativescc.org/work-groups/scvufa-work-group> .

Michael Cappon, project manager from Davey Resource Group, made a presentation summarizing the UFMP project. The project will produce a 40-year UFMP to guide the growth, preservation, and management of trees and green spaces across the County. The UFMP will include analyses of canopy goals, equity, resource gaps, and expected benefits, and provide priority tree planting areas, with a focus on disadvantaged communities. There will be a community/stakeholder outreach component that will include connecting with City foresters and parks departments. The UFMP will provide BMPs, recommendations, and model policies for other agencies' use.

Michael explained that the data requested from the SCVURPPP/Valley Water Santa Clara Basin Stormwater Resource Plan (SWRP) will be used as part of the priority planting analysis. The GIS data will be overlaid on layers for other metrics to develop a composite stormwater benefit score. The thinking is that locations that are suitable for green stormwater infrastructure (GSI) would also be good for trees.

Discussion of Data Sharing Request

Meeting participants had the following questions and concerns:

- Will the project team be collecting data from the South County SWRP? No, they were not aware of it.
- Will the data request include information on constructed GSI facilities? No.
- Can you explain how the SWRP metrics will help the UFMP? The GIS team has reviewed the SWRP and identified data that would be helpful to add to their current stormwater analysis.
- What will be done with the completed UFMP? The information will be provided to the cities and County and they will implement it individually as appropriate. The purpose of the UFMP is to show the best path forward for increasing canopy and achieving benefits. The County wants to partner with the cities and has some funding to support implementation.
- How will the sustainability of the trees be addressed, i.e., how will Caltrans and utility companies be

involved? They are involved in the stakeholder effort, and Caltrans is part of the Urban Forestry Alliance.

- Will the UFMP include recommendations for species of trees in each location? No, but will include recommended species suitable for the County in general.
- The project team should consider the water needs of different tree species and involve Valley Water as a stakeholder.

Recommendation to Management Committee

The invited speakers left the meeting, and the remaining participants discussed their recommendation to the Management Committee regarding entering into a data sharing agreement with Davey Resource Group. The consensus was that there would be no harm in sharing the data as long as SCVURPPP stays engaged and SCVURPPP staff review the products to ensure that topics and results are framed in a way that does not obligate the Co-permittees or lead to increased expectations under the MRP. They recommended that the Management Committee approve the data request with these conditions. It was also suggested that someone from the County Office of Sustainability and Resilience be invited to attend the BAMSC Development Subcommittee Trees in GSI Work Group so they gain a better understanding of how trees can work with stormwater treatment measures.

Action Items

Program staff will:

- Provide the meeting summary and presentation to the Management Committee.
- Request a vote of the Management Committee by email.
- Communicate the results of the vote to the County and Davey Resource Group.
- If the data request is approved, work with Davey Resource Group to complete the transfer of GIS files.

Meeting Attendance List

Meeting:	Special MC Discussion of GIS Data Request
Location:	Zoom
Date:	March 7, 2025, 9:00 am – 10:00 am
Name	Agency
Emma Hinojosa	City of Sunnyvale
Rajani Nair	City of San Jose
Mary Morse	City of San Jose
Colleen Trostle	City of Santa Clara
Pam Boyle Rodriguez	City of Palo Alto
Riley Moffett	City of Cupertino
Brian Jones	City of Mountain View
James Downing	Valley Water
Sheila Tucker	West Valley Stormwater Authority
Vanessa Marcadejas	Santa Clara County
Zhenzhen Jiang	Santa Clara County
Jasneet Sharma	Santa Clara County
Michael Cappon	Davey Resource Group
Jill Bicknell	SCVURPPP



California Stormwater Quality Association®

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

February 25, 2025

Kelly Rodman
State Water Resources Control Board
Division of Water Quality
1001 I Street, 15th Floor
Sacramento, CA 95814

Subject: Proposed Urban Stormwater Infiltration Water Quality Control Policy

Dear Ms. Rodman:

The California Stormwater Quality Association (CASQA)¹ appreciates the opportunity to provide initial input on the scope and objectives for the Proposed Urban Stormwater Infiltration Water Quality Control Policy (Urban Stormwater Infiltration Policy or Policy) during the informal comment period.

CASQA's [Vision for Sustainable Stormwater Management](#)² (Vision) defines the actions needed to manage stormwater as an essential component of the state's water resources, support human and ecological needs, protect water quality, and enhance and restore California's waterways. Guided by four principles, the Vision's actions are proactive solutions to achieve shared common goals – one of which is to maximize stormwater capture.

Through the lens of our Vision, CASQA has identified key goals that should be prioritized in the development and adoption of the Policy to ensure it effectively supports sustainable stormwater management across the state:

- **State Priorities** – Ensure consistency with the 10-year vision in the 2016 STORMS Strategy related to advancing infiltration and treating stormwater as a resource, as well as the goals of the Governor's 2022 California's Water Supply Strategy related to increasing stormwater capture and advancing groundwater recharge, and avoid creating additional barriers to stormwater capture.
- **Benefits of Urban Stormwater Capture** - As an important milestone in implementing our Vision, in 2024 we published [The Socioeconomic Value of Urban Stormwater Capture](#)³, which details the substantial socioeconomic benefits that can be realized from urban stormwater capture projects. The Policy should consider the additional socioeconomic benefits provided to communities, particularly disadvantaged communities, to ensure these types of projects are encouraged and not restricted.

¹ CASQA is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With well over 2,000 members, our membership is comprised of a diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 34 million people in California.

² CASQA's Vision for Sustainable Stormwater Management, October 2020. Available at: https://www.casqa.org/wp-content/uploads/2022/10/final_-_vision_for_sustainable_stormwater_management_-_10-07-2020.pdf

³ CASQA's The Socioeconomic Value of Urban Stormwater Capture, February 2024. Available at: <https://www.casqa.org/wp-content/uploads/2024/02/FINAL-The-Socioeconomic-Value-of-Urban-Stormwater-Capture-02-03-2024.pdf>

Proposed Urban Stormwater Infiltration Water Quality Control Policy

- **Constituents of Emerging Concern (CEC) and Permittee Liability** – The State Water Board should consider a holistic water policy for managing CECs such as PFAs, rather than limiting the lens to just the infiltration policy. Prohibiting or restricting infiltration in areas where CECs are a concern may protect groundwater, but would still result in the CECs remaining in surface waters. A holistic policy would evaluate the overall cost-benefit before restricting infiltration. The Policy should also consider the implications for MS4 permitting decisions. For example, if MS4s are prohibited from infiltrating, they may still bear the liability for the quality of that water, without other feasible treatment options available. Further, the long-term goal should not be a choice of having CECs in groundwater or surface water. Rather, through true source control, the state should strive to significantly reduce CECs before they cause widespread challenges for our water resources. This Policy could be a catalyst for prioritizing such needed solutions.
- **Permitting** – The Policy should not require additional permits to allow MS4 permittees to infiltrate. Also, new requirements placed in MS4 permits by the Regional Boards which tier off the Policy should be reasonable, locally adaptable, and as consistent as possible to avoid placing new financial burdens on already under-resourced agencies managing MS4s.
- **Case Studies** – In developing the Policy, consider experiences and successes with stormwater capture and infiltration in Los Angeles and elsewhere in the state, and ensure the Policy does not create new barriers that would prevent that type of infrastructure in the future.
- **State Agency Coordination** - The State Board should coordinate closely with other State agencies, such as the Department of Water Resources' Flood Managed Aquifer Recharge (FloodMAR) and Sustainable Groundwater programs to ensure consistency for the regulated communities in advancing innovative solutions to achieve sustainable water management across the state.

CASQA plans to participate in the upcoming CEQA scoping process to ensure consideration of the full range of environmental impacts that would occur if the State does / does not enact the Policy, and we anticipate submitting a comment letter by your March 31 deadline.

Thank you again for the opportunity to provide these comments during the informal comment period. If you have any questions, please contact me karen.cowan@casqa.org or (310) 462-4939.

Sincerely,



Karen Cowan, Executive Director
California Stormwater Quality Association

cc: Karen Mogus, State Water Board
Amanda Magee, State Water Board
CASQA Board of Directors
CASQA Executive Program Committee
CASQA Policy and Permitting Subcommittee
CASQA Stormwater Capture and Use Subcommittee



March 3, 2025

Christine Bergeron
Health and Ecological Criteria Division, Office of Water
Environmental Protection Agency
1200 Pennsylvania Avenue NW, Washington, DC 20460

Subject: Comparison of Aquatic Life Protective Values Developed for Pesticides Under the FIFRA and the CWA. Docket ID Number: EPA-HQ-OW-2023-0107

Dear Ms. Bergeron:

Thank you for the opportunity to provide comments on the Comparison of Aquatic Life Protective Values Developed for Pesticides Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Clean Water Act (CWA) (Draft Report¹). The California Stormwater Quality Association (CASQA)² is actively engaged with state and federal regulators in an effort to develop an effective pesticide regulatory system, based primarily on existing statutes, that includes timely identification and mitigation of urban water quality impacts, and proactively prevents additional problems through the registration and registration review processes.

CASQA supports conceptually EPA's efforts to harmonize the methods used under FIFRA and CWA to establish levels of pesticides in ambient waters that are protective of aquatic life, provided the harmonized approach achieves the overarching goal of ensuring that registration of pesticide products does not result in toxicity to aquatic life in receiving waters. CASQA has reviewed the Draft Report based on this goal and is providing the following comments related to the three requests in the Federal Register Notice.

1. Regarding EPA's draft analyses presented in the Draft Report, CASQA requests that additional analyses be conducted with a wider range of pesticides prior to finalizing the report. (See Comment #1 for more details).
2. The application of the aquatic life benchmarks (ALBs) developed under FIFRA by EPA's Office of Pesticides Programs (OPP) as informational benchmarks under CWA section 304(a)(2) may be appropriate, provided that the additional analyses requested in Comment #1 provide similar results to those shown in the Draft Report, and that a robust risk evaluation process is routinely conducted during initial pesticide registration and subsequently during registration review, to minimize the likelihood that legal pesticide use will result in concentrations in receiving waters above the ALBs. However, CASQA would request a formal comment period prior to establishing ALBs as informational benchmarks under 304(a)(2) to allow for an evaluation of the potential for any specific ALB to be an outlier that should not be used for this purpose. (See Comment #2 for more details).

¹ <https://www.epa.gov/system/files/documents/2024-12/comparison-aquatic-life-protective-values.pdf>

² CASQA is a nonprofit corporation that advances sustainable stormwater management protective of California water resources. With well over 2,000 members, our membership is comprised of a diverse range of stormwater quality management organizations and individuals, including cities, counties, special districts, federal agencies, state agencies, ports, universities and school districts, wastewater agencies, water suppliers, industries, and consulting firms throughout the state. Collectively, CASQA represents over 36 million people in California.

3. Regarding whether the eight current pesticide criteria values should be updated with the ALBs, CASQA generally supports updating criteria with the latest science. However, if the intent is for the proposed values to be maintained as 304(a)(1) recommended Ambient Water Quality Criteria (AWQC), then they should be updated using the “*Guidelines for Deriving Numerical Water Quality Criteria for the Protection of Aquatic Organisms and Their Uses*” (Guidelines). (See Comment #3 for more details).

COMMENT #1: ADDITIONAL PESTICIDES SHOULD BE EVALUATED PRIOR TO FINALIZING THE DRAFT REPORT

CASQA is concerned that the analysis presented in the Draft Report is not sufficient to represent the wide range of pesticides – including antimicrobials, fungicides, herbicides, insecticides and rodenticides – that are included in the list of over 750 pesticides in the Federal Register notice that have ALBs. The comparisons between the OPP and CWA processes presented in the Draft Report primarily rely on insecticides in the carbamate and organophosphate chemical classes. Of the eight pesticides for which both ALBs and AWQC were available (Draft Report Table 3.1), four are organophosphates, and seven of the eight are insecticides (the biocide/herbicide acrolein being the one exception). Furthermore, sales or use of six of the eight pesticides have been banned or highly restricted in California or nationwide.

The Draft Report (Tables 3.4, 3.5, 3.10) also includes comparisons of ALBs to “criteria-related values” based on alternative evaluation methodologies in lieu of recommended AWQC for over a dozen other insecticides, about half of which are carbamates or organophosphates. However, the results of those analyses demonstrate a much wider range of results (5-10x differences in the results as compared to 2x for the differences between the ALBs and recommended AWQC).

CASQA recommends calculation of additional AWQC or “illustrative” AWQC equivalent values for data-rich pesticides according to the Guidelines for comparison with ALBs, to include different chemical classes with different modes of action prior to finalizing the Draft Report. Identification of a targeted list of pesticides that is more representative of the 750 pesticides with ALBs and analysis of additional toxicity data for those pesticides would provide more certainty that the analysis is representative. The selected examples should be representative of widely used, current-use pesticides, including ideally those for which monitoring data have demonstrated elevated concentrations in ambient waters. At a minimum, this should include the neo-nicotinoids (e.g., imidacloprid), phenylpyrazoles (e.g., fipronil), and pyrethroids³ (e.g., bifenthrin), as well as selected antimicrobials in addition to herbicides and insecticides.

While we recognize that data are somewhat limited for most ALB pesticides, some of the current-use insecticides (including the examples listed above) have been studied extensively as a result of well-documented instances of surface water pollution, including pesticide-caused toxicity.

CASQA Recommendation:

- *Additional ALB and AWQC comparisons should be undertaken to better represent the full suite of current-use pesticide classes and modes of action prior to finalizing the report and taking any actions based on the report findings.*

COMMENT #2: DO NOT ESTABLISH ALBS AS RECOMMENDED AWQC; PROVIDE A FORMAL COMMENT PERIOD PRIOR TO USING ALBS AS CWA INFORMATIONAL BENCHMARKS

ALBs are worst case, single organism environmental toxicology test results and while they are based on toxicity tests of certain duration, there is no frequency or duration attached to the ALBs themselves. The ALBs represent a compilation of the toxicity testing results (AKA “toxicity endpoints”) for the most sensitive species in several

³ In the Draft Report, the pesticides with alternative, “criteria-related values” include fenpropathrin, a synthetic pyrethroid, but this is one of the lesser-used pyrethroids, and not one commonly identified as a surface water or sediment pollutant.

categories (vertebrates/invertebrates: freshwater and marine; plants: vascular and non-vascular). As a result, they may not fully represent the range of toxicity responses to a wider variety of aquatic organisms. The toxicity endpoints are used in pesticide risk assessment to identify the need for mitigation or use restrictions, and the ALBs are published to be “helpful in interpreting monitoring data and in identifying and prioritizing sites and pesticides that may require further investigation”⁴.

By contrast, AWQC established using the Guidelines are based on toxicity results for at least eight taxonomic groups of freshwater and saltwater organisms. AWQC represent the “highest concentration of specific pollutants or parameters in water that are not expected to pose a significant risk to the majority of species in a given environment...”⁵, and can be used by states and tribes in the development of water quality objectives and applied as regulatory standards.

While both processes are based on toxicity testing, the processes were established for fundamentally different purposes. CASQA is concerned that the most-sensitive species testing utilized for determining ALBs could result in outliers that would be significantly lower than an analysis used to generate an AWQC. CASQA is also concerned that reliance on registrant-submitted studies may result in promulgation of AWQCs prior to availability of the pesticide for independent testing.

CASQA’s member agencies are subject to a variety of requirements that result from pesticide-caused toxicity in urban waterbodies, including monitoring and potential best management practice implementation. Significant costs are incurred by these agencies to address pollution that could be mitigated during the registration process. CASQA supports actions by USEPA that recognize the potential impacts of pesticides on aquatic life and prevent registration of pesticides or pesticide uses that have the potential to cause aquatic toxicity. If the harmonization approach outlined in the Draft Report supports this goal by pairing the establishment of ALBs with a robust risk evaluation process and corresponding registration actions to mitigate identified risks, CASQA would have fewer concerns with the use of ALBs for CWA purposes. However, if the registration process does not effectively mitigate the risk of pesticide-related aquatic toxicity in receiving waters, CASQA would have significant concerns with using ALBs for CWA purposes if they are more stringent than criteria that would have been developed using the Guidelines.

Should USEPA move forward with using ALBs for CWA purposes, CASQA recommends that they be established under CWA section 304(a)(2) as informational benchmarks. This would provide states and Tribes with an informational baseline that can be considered during the development of state and tribal water quality standards to manage potential effects on aquatic life. However, only values that are established using the Guidelines should be established as AWQC under CWA section 304(a)(1).

CASQA also requests that USEPA provide a formal comment period prior to establishing ALBs as informational benchmarks under CWA section 304(a)(2). This will allow stakeholders to review the proposed values and evaluate whether there appear to be any outliers that would not be appropriate to establish as informational benchmarks.

CASQA Recommendation:

- *Should the proposed harmonized approach be utilized, ALBs should only be used as informational benchmarks under CWA section 304(a)(2), and a formal comment period should be provided prior to establishing ALBs as informational benchmarks.*

⁴ Office of Pesticide Programs’ Aquatic Life Benchmarks website:

<https://www.epa.gov/pesticide-science-and-assessing-pesticide-risks/aquatic-life-benchmarks-and-ecological-risk>

⁵ National Recommended Water Quality Criteria - Aquatic Life Criteria Table:

<https://www.epa.gov/wqc/national-recommended-water-quality-criteria-aquatic-life-criteria-table>

COMMENT #3: IF EXISTING AWQC ARE UPDATED USING ALB DATA, THE GUIDELINES SHOULD BE USED TO ESTABLISH THE NEW AWQC; SHOULD NOT APPLY TO COPPER AWQC

CASQA generally supports updating recommended AWQC using the latest science and would support USEPA using new data from the pesticide registration process to update existing AWQC for the eight pesticides shown in Table 3.1 of the Draft Report. However, if the intent of the updates is to maintain AWQC for these pesticides, then the new values should be established using the Guidelines. As noted in Comment #2, the ALBs and AWQC are established using different processes for different purposes. As a result, any value published by USEPA as an AWQC should be established using the Guidelines to avoid confusion as to the basis of the values. If USEPA desires to use the ALBs for these eight pesticides in lieu of the existing AWQC rather than establishing a new AWQC using the Guidelines, CASQA requests that they be established as informational benchmarks under 304(a)(2).

However, given that most of these eight pesticides are legacy pesticides that have been or are in the process of being banned or severely restricted, CASQA advises that EPA invest its resources in deriving additional AWQC for current-use pesticides that are known to have compromised surface water quality, as indicated by our comment #1 above.

Additionally, Table 1 in the Federal Register notice may create confusion as to which pesticides USEPA is considering updating using this process. Table 1 identifies pesticides for which there is a CWA 304(a)(1) AWQC in bolded text. However, the pesticides in bold do not match the pesticides evaluated in the report in Table 3.1. For example, arsenic acid and copper are both bolded in Table 1 but not discussed in the Draft Report. CASQA would have significant concern with ALB values being used in lieu of the established AWQC for copper. CASQA requests that when the final report is published, USEPA is clear as to which pesticides are included in any recommendations regarding existing AWQC and that no action be taken for pesticides not evaluated in the report, including copper.

CASQA Recommendation:

- *If existing pesticide AWQC are updated using more recent pesticide registration data, the Guidelines should be used to establish the new AWQC. If a different approach is used, then the new values should be established as informational benchmarks.*
- *The copper AWQC should not be updated as part of this process.*

Thank you again for the opportunity to comment on the Comparison of Aquatic Life Protective Values Developed for Pesticides Under the FIFRA and the CWA. If you have any questions, please contact CASQA Executive Director Karen Cowan at (310) 462-4939.

Sincerely,



Karen Cowan, Executive Director
California Stormwater Quality Association

cc: CASQA Board of Directors
CASQA Executive Program Committee
CASQA Policy and Permitting Subcommittee
CASQA True Source Control Subcommittee

Scheduled Meetings and Deliverables
March 2025 – May 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	SCVURPPP Rural Roads Workshop 9:00 am – 11:30 am SCVURPPP Information Management AHTG 10:00 am – 11:30 pm SCVURPPP WEO AHTG Meeting 2:00 pm – 4:00 pm	Hybrid: Valley Water Board Room, 5750 Almaden Expressway, San Jose/ Zoom Meeting Zoom Meeting Zoom Meeting
10	SCVURPPP POC AHTG Meeting 1:00 pm – 3:00 pm	MS Teams Meeting
11	BAMSC Development Subcommittee 1:00 pm – 3:00 pm	Zoom Meeting
13	SCVURPPP Alternative Compliance Work Group 2:00 pm – 3:00 pm	MS Teams Meeting
18	SCVURPPP Trash AHTG 1:00 pm – 3:00 pm	Zoom Meeting
19	SCVURPPP IND/IDDE AHTG 10:00 am – 11:30am	Zoom Meeting
20	SCVURPPP Management Committee 9:30 am – 11:00 am <ul style="list-style-type: none"> • Approval – Water Year 2024 Urban Creeks Monitoring Report & Electronic Data Submittal • Approval – Data Sharing Agreement • Approval - FY 2025-26 Program Work Plan Monitoring Presentation – Water Year 2024 10:45 am – 12:00pm	Zoom Meeting Zoom Meeting
24	C3PO AHTG 1:30 pm – 3:00 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
March 2025 – May 2025

April 2025

2	BAMSC Regional Monitoring Coalition (RMC) Work Group 10:00 am – 12:00 pm	MS Teams Meeting
3	SCVURPPP 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	SCVURPPP Trash AHTG 1:00pm – 3:00pm	Zoom Meeting
17	SCVURPPP Management Committee 9:00am – 10:00am <ul style="list-style-type: none"> • Acceptance - Draft FY 2024-25 Program Manager Mid-Year Self-Audit Report • Approval - FY 2025-26 Program Manager Notice to Proceed 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	SCVURPPPP C.3/GSI Workshop: LID and GSI Design and Maintenance 9:00 am – 3:00 pm	In-Person: Campbell Community Center

**Scheduled Meetings and Deliverables
March 2025 – May 2025**

May 2025

1	SCVURPPPP Information Management AHTG 10:00 am – 11:30am	Zoom Meeting
2	WMI – Zero Litter Initiative Steering Committee 9:00 am – 10:00 am	Zoom Meeting
7	BAMSC Monitoring and Pollutants of Concern (MPC) Subcommittee 10:00 am – 3:30 pm	MS Teams Meeting
15	SCVURPPPP Management Committee 9:30 am – 11:00 am	Zoom Meeting
20	SCVURPPPP Trash AHTG 1:00pm – 3:00pm	Zoom Meeting
22	BAMS Collaborative Steering Committee Internal Portion – 9:30 am – 12:00 pm External Portion - 1:00 pm – 3:00 pm	MS Teams Meeting
26	SCVURPPPP C3PO AHTG 1:30 pm – 3:00 pm	Zoom Meeting

Anticipated Action Items for Future SCVURPPPP Management Committee Meetings

MC Meeting	Action Item(s)
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