

NOTICE OF MEETING

NPDES TECHNICAL ADVISORY COMMITTEE

March 2, 2011

TUESDAY, MARCH 8, 2011 – 10:00 AM to NOON
CITY OF REDWOOD CITY'S MUNICIPAL SERVICE CENTER
1400 Broadway, Redwood City –Conference Room
(See location map on back)

Web Site: www.flowstobay.org

AGENDA

1. **INTRODUCTIONS, ANNOUNCEMENTS, MINUTES APPROVAL, AGENDA REVISIONS – MATT FABRY**
2. **ACTION ITEMS**
 - A. **APPROVAL OF COMMENT LETTER REGARDING CALTRANS' STATEWIDE STORMWATER NPDES PERMIT – FRED/MATT/EVERYONE**
3. **PRESENTATIONS**
 - A. **APPROVAL OF BASMAA'S REGIONAL MONITORING COALITION STATUS REPORT – JON KONNAN & MATT**
 - B. **WATER BOARD STAFF'S REVIEW OF PESTICIDE TOXICITY CONTROLS SECTION OF ANNUAL REPORT AND NEXT STEPS – MATT/FRED JARVIS/EVERYONE**
 - C. **STATUS OF UNFUNDED MANDATE TEST CLAIM – MATT/EVERYONE**
 - D. **PRELIMINARY COUNTYWIDE PROGRAM BUDGET INFORMATION FOR FY 2011/12 AND PROCESS/SCHEDULE FOR APPROVING BUDGET – MATT/EVERYONE**
 - E. **STATUS OF COUNTYWIDE PROGRAM'S INVOLVEMENT IN STATEWIDE INITIATIVES AFFECTING STORMWATER – MATT/FRED/EVERYONE**
 - F. **BASMAA UPDATE – MATT**
4. **SUBCOMMITTEE REPORTS**
 - A. **PUBLIC INFORMATION/PARTICIPATION – MIKE MCELLIGOTT, City of Foster City**
 - B. **COMMERCIAL/INDUSTRIAL AND ILLICIT DISCHARGE – WARD DONNELLY, City of Daly City**
 - C. **NEW DEVELOPMENT – MATT FABRY, City of Brisbane**
 - D. **MUNICIPAL GOVERNMENT MAINTENANCE ACTIVITIES**
 - i. **TRASH WORK GROUP AND PROGRESS WITH DEMONSTRATION PROJECT – KILEY KINNON, City of Burlingame**
 - ii. **PARKS MAINTENANCE AND INTEGRATED PEST MANAGEMENT WORK GROUP – VERN BESSEY, City of San Mateo**
 - E. **WATERSHED ASSESSMENT AND MONITORING – DERMOT CASEY, County Environmental Health**
5. **PUBLIC COMMENTS**
6. **NEXT MEETING**

FUTURE MEETINGS:

APRIL 19 @ _____

MAY 17 @ _____

JUNE 21 @ _____

Post by 5:00 P.M., Wednesday, March 2, 2011

NOTE: Persons with disabilities who require auxiliary aids or services in attending and participating in this meeting should contact Matthew Fabry at (415) 508-2134, five working days prior to the meeting date.

Public records that relate to any item on the agenda for a regular NPDES Technical Advisory Committee (TAC) meeting are available for public inspection. Those records that are distributed less than 72 hours prior to the meeting are available for public inspection at the same time they are distributed to all members, or a majority of the members of the TAC. The TAC has designated Brisbane's City Hall, located at 50 Park Place, Brisbane, for purpose of making those public records available for inspection. The documents are also available on the C/CAG Internet Web site, at the link for agendas for upcoming meetings. The website is located at: <http://www.ccag.ca.gov>

NPDES TAC and Subcommittee Meeting Locations:

- New Development – 1:30 to 3:30 pm, first Tuesday of every other month: next meeting will be **April 5 at a location to be determined.**
- Public Information/Participation – 10:00 am – noon, second Tuesday of every other month: next meeting **will be on March 15 (one week later than usual) @ Foster City Community Center (Port Room) 1000 East Hillsdale Blvd, Foster City.**
- Technical Advisory Committee – 10:00 am to noon, third Tuesday of most months, location varies.
- Municipal Maintenance – Noon to 1:00 pm (\$10:00 lunch), fourth Wednesday quarterly: next meeting will be on **March 23 @ at Holbrook-Palmer Park in Atherton.**
- Parks Maintenance and Integrated Pest Management Work Group – 1:30 to 3:00 pm, fourth Tuesday approximately quarterly at San Mateo City Hall, 330 West 20th Avenue. Next meeting will be on **April 26 at San Mateo City Hall, San Mateo.**
- Trash Work Group – 10:00 to noon, usually fourth Wednesday each quarter at the Belmont Sports Complex, 550 Island Parkway, Belmont. **Next meeting will be on March 23 at 10:00 am.**
- Commercial/Industrial/Illicit Discharge Control – 1:00 to 2:30 pm, usually third **Wednesday** of every quarter: next meeting will be on **March 16 @ San Mateo County Environmental Health's Conference Room, 2000 Alameda de las Pulgas, San Mateo.**
- Watershed and Monitoring – 10:00 am to noon, second Thursday of month, approximately every quarter: Next meeting will be held at a date to be determined.

Yellow highlight denotes recent change.

March 2011

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street 24th floor
Sacramento, CA 95814

Subject: “Comment Letter – Caltrans MS4 Permit”

Dear Ms. Townsend:

The San Mateo Countywide Clean Water Program’s (Countywide Program) appreciates this opportunity to comment on the draft municipal separate storm sewer system NPDES permit for the California Department of Transportation (Caltrans). The Countywide Program is a consortium of 21 municipalities and the San Mateo County Flood Control District (District) that operates under the auspices of the City/County Association of Governments of San Mateo County. The Countywide Program assists with the implementation of the municipal regional stormwater permit (MRP) requirements that may be handled more efficiently on a countywide basis.

Caltrans is an essential partner with local municipalities and the District in helping to address the problems caused by municipal stormwater runoff in San Mateo County, and it will play a key role in achieving trash load reductions and implementing pesticides toxicity, mercury, and PCBs controls. Caltrans owns and operates El Camino Real that serves as the major transportation corridor through much of the commercial areas of San Mateo County. It also operates major freeways within the county, essential highways linking the county’s coastside and bayside, and Highway 1 along the coastside of San Mateo County. In addition, Caltrans operates a major maintenance facility located in the City of Foster City.

The Countywide Program supports the draft Caltrans NPDES permit with the proposed modifications and additions described below. The basis of this support and the proposed modifications and additions are included in the following sections.

Support for Trash Load Reduction Requirements

The Countywide Program supports the San Francisco Bay Region Attachment V requirements for Trash Load Reduction because it would be impossible for local municipalities and the District to comply with the MRP’s trash load reduction mandates without Caltrans also controlling trash and litter from its facilities and right-of-ways. In many places the Caltrans storm drainage system ties into local municipal stormwater infrastructure, so the inclusion of Caltrans in formal NPDES permit requirements for trash and litter control is essential.

Additional Pesticides Toxicity Controls

Background

The draft Caltrans NPDES permit documents the importance of Caltrans' pesticide use practices in protecting water quality. Finding 12 identifies pesticides as a potential pollutant; Finding 14 identifies diazinon and chlorpyrifos as high priority constituents in Caltrans runoff; and Finding 27 concludes that the toxicity levels found in Caltrans runoff indicates a need to monitor acute and chronic toxicity. In response to this priority, the draft Caltrans NPDES permit requires that climate appropriate landscaping be used that "minimizes the use of pesticides..." [Provision 2.d.1).d).i).(5)] Further, the draft Caltrans permit requires that: "The Department shall control its handling and application of chemicals including pesticides, herbicides, and fertilizers to reduce or eliminate the discharge of pollutants to the MEP." [Provision 2.h.3).b).]

The draft Caltrans NPDES permit's Finding 35 states this Order requires Caltrans to comply with all TMDLs for which it has been assigned a waste load allocation, a load allocation, or specific actions to implement the TMDL, either individually or jointly. In addition the draft permit states the following in Attachment IV TMDL Requirements: "The Department is obligated to consult each TMDL to comply with all applicable allocations and other provisions, whether included in the table or not."

The San Francisco Bay Water Board's Water Quality Control Plan (Basin Plan) Water Quality Attainment Strategy and TMDL for Diazinon and Pesticide-Related Toxicity in Urban Creeks states that the implementation requirements will be included in future NPDES permits. The San Francisco Bay Water Board crafted a four-page Pesticides Control Provision C.9 of the MRP to add compliance dates and needed specificity to incorporate the Basin Plan's requirements into the MRP. The draft Caltrans NPDES permit's Attachment IV implementation requirements have been reduced to merely submitting a Pesticide-Related Toxicity Control Program plan with the Year 2 Annual Report.

Recommended Changes

The Countywide Program recommends that additional clarifying language for pesticides toxicity control be added to Attachment V Part 2 San Francisco Bay Region portion of the Caltrans NPDES permit or to Attachment IV. The addition of these requirements should make Caltrans' obligations for its facilities and right-of-ways identical to those of the municipalities where Caltrans facilities are located and would clarify Caltrans' responsibilities for pesticides toxicity control.

The MRP requires that municipalities and flood control districts work with the California Department of Pesticides Regulation and USEPA to improve the regulation of pesticides in order to protect water quality. It is essential to these efforts include as many partners as possible. On this basis we recommend that at a minimum the following text be added to the Caltrans NPDES permit:

“6. Pesticides Toxicity Control

The Department shall participate in relevant pesticide regulatory processes (may be done jointly with other Permittees, such as through CASQA or BASMAA and/or the Urban Pesticide Pollution Prevention Project).

- a. The Department shall track USEPA pesticide evaluation and registration activities as they relate to surface water quality, and when necessary encourage USEPA to coordinate implementation of the Federal Insecticide, Fungicide, and Rodenticide Act and the Clean Water Act and to accommodate water quality concerns within its pesticide registration process.
- b. The Department shall track California Department of Pesticides Regulation (DPR) pesticide evaluation activities as they relate to surface water quality, and when necessary, encourage DPR to coordinate implementation of the California Food and Agriculture Code with the California Water Code to accommodate water quality concerns within its pesticide evaluation process;
- c. The Department shall assemble and submit information (such as monitoring data) as needed to assist DPR and County Agricultural Commissioners in ensuring that pesticide applications comply with water quality standards; and
- d. As appropriate, the Department shall submit comment letters on USEPA and DPR re-registration, re-evaluation, and other actions relating to pesticides of concern for water quality.
- e. In each Annual Report the Department shall list its specific participation efforts, information submitted, and how regulatory actions were submitted. If the Department chooses to participate in a regional effort to comply with these requirements, it may reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.”

Mercury and PCBs Modifications

Mercury and PCBs Control

The draft Caltrans NPDES permit’s Attachment IV TMDL Requirements under R2 – San Francisco Bay Regional Water Board states that the San Francisco Bay Regional Water Board TMDLs for San Francisco Bay PCBs and Mercury are directly enforceable through the Caltrans Order. This attachment contains a number of requirements that are similar to those contained in the MRP. We support the inclusion of these requirements in the Caltrans NPDES permit.

In a number of cases a mercury and PCBs requirement is listed under the WLAs/Deliverables/Action Required column of the TMDL table, but under the Compliance Date Due Date the term “none specified” is used. It would be more accurate and we recommend replacing this language with the words “see below” because the requirements listed are supposed to be implemented and progress reported by the due dates shown in the subsequent sections included in the table.

This TMDL table also uses the words “None Specified” for WLA under the mercury and PCBs section. The Basin Plan’s Table 7.2.2-2 Individual Wasteload Allocations for Mercury in Urban Stormwater Dischargers and Table 7.2.3-5 County-Based Watershed Wasteload Allocations for Stormwater Runoff clearly require that Caltrans will be responsible for a still to be determined portion of the WLA assigned to stormwater dischargers (mercury) or counties (PCBs). We believe it would be more accurate and recommend that “None Specified” be replaced with “To Be Determined as described in the Basin Plan.”

We appreciate your consideration of our comments. I can be reached at (415) 508-2134 or via email at mfabry@ci.brisbane.ca.us.

Sincerely,

Matthew Fabry, P.E.
Program Coordinator
San Mateo Countywide Clean Water Program



California Regional Water Quality Control Board

San Francisco Bay Region



Linda S. Adams
Acting Secretary for
Environmental Protection

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
<http://www.waterboards.ca.gov/sanfranciscobay>

Edmund G. Brown, Jr.
Governor

February 10, 2011

To: Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074) Permittees

Sent via email to:

Jim Scanlin, Alameda Countywide Clean Water Program: jims@acpwa.mail.co.alameda.ca.us
Geoff Brosseau, Bay Area Stormwater Management Agencies Association: geoff@brosseau.us
Tom Dalziel, Contra Costa Clean Water Program: tdalz@pw.cccounty.us
George Hicks, City of Fairfield: ghicks@ci.fairfield.ca.us
Kevin Cullen, Fairfield-Suisun Sewer District: kcullen@fssd.com
Matt Fabry, San Mateo Countywide Pollution Prevention Program: mfabry@ci.brisbane.ca.us
Adam Olivieri, Santa Clara Valley Urban Runoff Pollution Prevention Program: awo@eoainc.com
Daniel Kasperson, City of Suisun: dkasperson@suisun.com
Sam Kumar, City of Vallejo: skumar@ci.vallejo.ca.us
Lance Barnett, Vallejo Sanitation & Flood Control District: lbarnett@vsfcd.com

From: Thomas Mumley
Assistant Executive Officer

**Subject: Review of Municipal Regional Stormwater NPDES Permit Provision C.9,
Pesticide Toxicity Controls, Sections of the 2010 Annual Report**

We are sending this letter to all Permittees covered by the Municipal Regional Stormwater NPDES Permit (Order R2-2009-0074). It provides a summary of our review of sections of the 2010 Annual Report associated with permit Provision C.9, Pesticide Toxicity Controls. These include C.9.a (Integrated Pest Management (IPM) Policy or Ordinance), C.9.b (Implementation of IPM Policy or Ordinance), C.9.c (Require Contractors to Implement IPM), and C.9.h (Public Outreach). We also include recommendations to improve future Annual Reports. In addition, the enclosed spreadsheet shows our findings regarding each Permittee's compliance with the requirements of Provision C.9, except for subprovisions C.9.e (Track and Participate in Relevant Regulatory Processes), which was fulfilled at the regional level, and C.9.g (Evaluate Implementation of Source Control Actions Relating to Pesticides), which does not apply until the 2013 Annual Report.

C.9.a Integrated Pest Management (IPM) Policy or Ordinance

This subprovision requires Permittees to adopt IPM policies or ordinances no later than July 1, 2010, that include provisions to minimize reliance on pesticides that threaten water quality and to require the use of IPM in municipal operations and on municipal property. All but four Permittees submitted a written policy in their 2010 Annual Report, and some of these are very good IPM policies. However, the majority of the policies have one or more of the following deficiencies:

- The policy has not been adopted by the municipality's governing body.

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- IPM is optional or conceptual: the policy does not establish and require a hierarchy of pest control actions wherein least-toxic or non-chemical controls must be used first and use of toxic chemicals must be the last resort.
- The policy does not state that it applies to all employees and operations.
- The policy does not state that it applies to all current and future contractors of the municipality. (Municipalities that do not use contractors now may do so in the future.)
- The policy focuses solely on landscaping, and does not include structural pest control (including insects, birds, and mammals).
- The policy is vague in other ways, such as who has ultimate responsibility for implementation; how implementation will be ascertained/verified/tracked (e.g., record-keeping not required); and/or what pesticides are prohibited (if any, e.g., organophosphates, pyrethroids, fipronil). If such details are contained within an accompanying IPM Program, rather than in the IPM Policy, the Program document must be submitted as well.

The contents of an appropriate IPM policy are described in the Water Quality Attainment Strategy and Total Maximum Daily Load (TMDL) for Diazinon and Pesticide-Related Toxicity in Urban Creeks section of the San Francisco Bay Region Water Quality Control Plan (Basin Plan)¹:

Pesticide-related toxicity in the Region's urban creeks is to be eliminated and prevented by using pest management alternatives that protect water quality and by not using pesticides that threaten water quality. This can best be accomplished through the rigorous application of integrated pest management techniques and the use of less toxic pest control methods. The term "integrated pest management," as used here, refers to a process that includes setting action thresholds, monitoring and identifying pests, preventing pests, and controlling pests when necessary. Integrated pest management meets the following conditions:

- *Pest control practices focus on long-term pest prevention through a combination of techniques, such as biological control, habitat manipulation, and modification of cultural practices;*
- *Pesticides are used only after monitoring indicates that they are needed;*
- *Treatments are made with the goal of removing only the target pest; and*
- *Pesticides are selected to minimize risks to human health, beneficial and non-target organisms, and the environment, including risks to aquatic habitats.*

The IPM ordinance/policy must address structural and landscape pest control. Some Permittees submitted Bay Friendly Landscaping plans as their IPM policies. These plans are excellent for reducing pesticide use in landscaped areas, but they do not comprise a complete IPM policy. Municipalities own/operate structures such as City Halls, train stations, child care centers, civic centers, community theaters, fire stations, police stations, recreation centers and park buildings, senior centers, and maintenance facilities. IPM ordinances/policies must apply to all city facilities (buildings as well as grounds).

Some Permittees use the City/County of San Francisco's tiered list of pesticides, in which Tier 1 chemicals are of highest concern, Tier 2 are of moderate concern, and Tier 3 are of lowest concern. We support the use of this list and maintain that a fully implemented IPM program

¹ Available at

http://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/urbancrksdiazinontmdl.shtml

would not allow the use of a Tier 1 or 2 chemical without thorough documentation that the pest must be eradicated and all other means of control have failed.

To address the aforementioned shortcomings in many of the submitted policies, all Permittees should review their IPM policies/ordinances, revise them as needed, and resubmit them with their 2011 Annual Report. Evidence that each IPM policy/ordinance has been adopted by the municipality’s governing body should also be submitted. We will defer further evaluation of the adequacy of IPM policies/ordinances until after the 2011 Annual Report submittal.

We recommend Permittees consider local “good example” IPM policies². In addition, guidance on establishing a municipal IPM program can be found at <http://anrcatalog.ucdavis.edu/pdf/8093.pdf>. We are available to discuss the IPM policies further with each Program.

C.9.b. Implementation of IPM Policy or Ordinance

This subprovision requires Permittees to report on IPM implementation by showing trends in quantities and types of pesticide used, and to suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphorous pesticides, pyrethroids, carbaryl, and fipronil. Many Permittees presented information about how they are endeavoring to control or reduce usage of pesticides. This is useful information, and we welcome a continuation of this type of reporting. **However, for all future Annual Reports, trends in quantities and types of pesticides used must be reported.** Please use the following format:

Trends in Quantities and Types of Pesticides Used^a

Pesticide Category • Specific pesticide used	2010	2011	2012	2013	2014
Organophosphates • Product a • Product b	• Amount ^b • Amount	• Amount • Amount			
Pyrethroids • Product x • Product y					
Carbaryl					
Fipronil					
...other					
...other					

^a Includes all municipal structural and landscape pesticide usage by employees and contractors.

^b Weight or volume of the product or preferably its active ingredient, using same units for the product each year.

C.9.d. Require Contractors to Implement IPM

This subprovision requires Permittees, no later than July 1, 2010, to hire IPM-certified contractors or include contract specifications requiring contractors to implement IPM and to submit documentation in the Annual Report to confirm compliance, such as contract

² Contra Costa County and Santa Clara County have good IPM policies, although these should be strengthened by explicitly stating that the policy applies to contractors (and County Roads departments) and by prohibiting use of pesticides with significant water quality impacts, such as pyrethroids and fipronil.

specifications or contractor's certification. Most Permittees submitted some form of contract specification or statement of contractor IPM certification. However, some contract specifications made IPM optional, and some call for non-IPM actions. **All Permittees should review their contract specs to determine whether they reflect the required elements of an IPM policy.** Also, both landscape and structural pest control must be covered. We will focus future Annual Report reviews more closely on C.9.d requirements.

Regarding IPM-certified contractors, at this time, acceptable IPM certifications are from EcoWise Certified, Green Shield, and GreenPro. California Department of Pesticide Regulation (DPR) licensing (Qualified Applicator License, etc.) is a basic requirement for all pest control operators and is not the same as IPM certification. DPR IPM Innovator awards are also not IPM certifications. Bay-Friendly Landscape training is good for contractors who work solely in landscaping. In all cases, Permittees must demonstrate that it requires the contractor to implement IPM, even IPM-certified contractors will implement IPM only upon request from the client.

C.9.f. Interface with County Agricultural Commissioners

This subprovision requires Permittees to summarize in their Annual Reports improper pesticide usage reported to county agricultural commissioners. Not only is it a requirement, it is in a Permittee's best interest to do so. Only DPR can regulate use of pesticides, and only DPR and county agricultural commissioners can enforce pesticide regulations. Although Permittees cannot regulate or enforce against use of pesticides, they can report to county agricultural commissioners observations of improper use of pesticide, such as presence of pesticides in storm drain systems, including along curbs. This year very few Permittees provided such reports.

C.9.h. Public Outreach

We recognize that Permittees are conducting public outreach collaboratively at the Program and regional levels, and we did not focus our review on outreach requirements this year. Please note that C.9.h.iii-iv require outreach to residents about EcoWise Certified IPM (or equivalent certification program) and outreach to pest control operators; only Santa Clara Valley Permittees reported such outreach last year. We plan to focus on these requirements in future Annual Report reviews.

To conclude, we recognize Permittees are implementing actions to control their uses of pesticides and to affect use by others. However, prevention and control of pesticide-caused toxicity remains a formidable challenge. We look forward to working with you to collectively improve the effectiveness of our pesticide toxicity control actions. For questions regarding this review, please contact Jan O'Hara at johara@waterboards.ca.gov or (510) 622.5681.

Enclosure: MRP C.9 Annual Report Review Spreadsheet

New Development Subcommittee (NDS)

Meeting Date: February 1, 2011

Present: David Huynh, Atherton; Dalia Corpus, Belmont; Matt Fabry, Brisbane; Kiley Kinnon, Burlingame; Muneer Ahmed, Colma and Half Moon Bay; Jeanne Naughton, Daly City; Laura Prickett, EOA; Catherine Chan, Hillsborough; Shaun Mao, Menlo Park; Tanya Benedik, Millbrae; Paul Willis, Redwood City; Laura Russell, San Bruno; Gavin Moynahan, San Carlos; Ken Pacini, City of San Mateo; Camille Leung and Diana Shu, County of San Mateo; Rob Lecel, S. San Francisco

Subcommittee Actions:

1. Approved summary of December Subcommittee meeting.
2. Agreed to explore the possibility of partnering with the American Public Works Association (APWA) to offer Qualified SWPPP Practitioner/Developer QSP/QSD training to both municipal staff and contractors in late April.

Requested Technical Advisory Committee Action or Feedback/Guidance (if any): None

Other Information/Announcements:

1. **Discussed Notices of Violations** issued to MRP permittees, including violations of Provision C.6 (construction site control) and the fact that there is a disproportionate number in San Mateo County. The following suggestions were made: invite Water Board staff to a subcommittee meeting to clarify what they are looking for; get more information on what high-performing counties (Santa Clara or Contra Costa) are doing; have the Countywide Program/EOA provide individualized training to municipalities; pool resources to “job share” a stormwater person among several municipalities.
2. **Reviewed C.6 requirements.** Inspect sites that disturb 1 acre or more of land and “high priority sites” at least monthly during wet season. Record all stormwater inspections on inspection checklist and track results in a database or spreadsheet, such as the Countywide Program’s tracking spreadsheet. Whenever an inspector sees a stormwater problem, require it to be corrected. If it cannot be corrected while inspector is on site, issue a written notice of violation, to demonstrate enforcement to Water Board staff. Record violations/corrections on an inspection form and in the tracking spreadsheet. Verify correction within 10 business days, or escalate enforcement.
3. Reviewed BASMAA’s proposed approach to low impact development (**LID**) **feasibility** criteria.
4. Bay Area Stormwater Management Agencies Assn. (**BASMAA**) Development Committee update:
 - a. The public comment period for the Special Projects and Soil Specifications proposals closed on January 28. So far the comments have not been posted on the Water Board’s website.
 - b. Special projects feedback from Water Board staff was to revise the criteria to (1) increase density and (2) use graduated LID reductions, with maximum reduction less than 100%.
 - c. Alameda County is updating BASMAA’s plan sheet of construction BMPs for its own use and will make the updated plan sheet available to others.
5. The Countywide Program submitted a **grant application** to EPA’s San Francisco Bay Water Quality Improvement Fund to develop two green street projects in an area of San Carlos with elevated PCBs and to prepare a countywide green streets implementation plan.

Work That Affects Other Subcommittees: None

Next Steps:

- Laura Prickett and Paul Willis will coordinate with APWA to plan QSP/QSD training.
- Laura Prickett will contact Burlingame staff about holding the April 5 Subcommittee meeting at Burlingame City Hall, with a tour of the new bioretention areas before the meeting.

Next Meeting: April 5, 2011, from 1:30 to 3:30 p.m. Location to be determined.