



**CITY/COUNTY ASSOCIATION OF GOVERNMENTS
OF SAN MATEO COUNTY**

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Pacifica • Portola Valley • Redwood City • San Bruno • San Carlos • San Mateo • San Mateo County • South San Francisco • Woodside*

Submitted via email and the SMCWPPP website (flowstobay.org)

July 2, 2020

Mr. Michael Montgomery, Executive Officer
California Regional Water Quality Control Board, San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: Report of Waste Discharge

Mr. Montgomery:

On behalf of the municipal agencies in San Mateo County subject to NPDES permit No. CAS612008, Order R2-2015-0049 (also referred to as the Municipal Regional Permit, or MRP) issued by the California Regional Water Quality Control Board, San Francisco Bay Region (Regional Water Board), the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) is pleased to submit a Report of Waste Discharge (ROWD) in accordance with Title 23 of the California Code of Regulations.¹

The City/County Associate of Governments of San Mateo County (C/CAG) implements a number of programs related to transportation and quality of life in the county. SMCWPPP is one such program and focuses on municipal stormwater compliance activities mandated through the MRP. Each municipality in San Mateo County is a Permittee and responsible for meeting permit mandates. SMCWPPP provides technical assistance to the Permittees and performs certain compliance activities on their behalf where countywide or regional efficiencies exist. The overall goal is to optimize stormwater runoff management and thereby protect and enhance water quality in San Mateo County creeks and San Francisco Bay.

SMCWPPP is submitting this ROWD by posting all of its components on the SMCWPPP website and providing the following URL to Regional Water Board staff:

flowstobay.org/report-of-waste-discharge/

In addition to this transmittal letter, the ROWD consists of:

- A certification form signed by each of the 21 San Mateo County municipalities' Duly Authorized Representative;
- An application form for NPDES permit reissuance;
- A list of San Mateo County Permittees with contact information;
- A map with the location of San Mateo County Permittee jurisdictional boundaries and associated water bodies;

¹ Each of the 21 San Mateo County municipalities' Duly Authorized Representative authorized Matthew Fabry, the SMCWPPP Program Manager, to submit this ROWD on its behalf.

- The C/CAG Joint Powers Agreement showing the relationship among C/CAG and San Mateo County Permittees;
- A table that summarizes and prioritizes San Mateo County Permittee issues for the permit reissuance and provides recommended updates to MRP requirements with references to supporting documents;
- A list of the ROWD supporting documents; and,
- A table summarizing for each Permittee trash load reduction and remaining acres to be addressed.

Please note that a May 17, 2020 email from Keith Lichten, Chief, Watershed Management Division, summarized Regional Water Board staff's expectations for materials that should be submitted as part of the ROWD. SMCWPPP's ROWD submittal includes all of the materials requested, with the exception of items that are due on September 30, 2020 with the MRP FY 2019/20 Annual Reports (e.g., Reasonable Assurance Analysis-related submittals, and an assessment methodology and data collection program to quantify PCBs loads reduced through implementation of the protocol for controlling PCBs during building demolition).

It should also be noted that the ROWD supporting documents include a report prepared by the City of Pacifica and the County of San Mateo in compliance with MRP Provision C.14.b.iii (1)(e): If (San Pedro Creek and Pacifica State Beach bacteria TMDL) wasteload allocations are not achieved by the end of the Permit term, the City and County shall submit a plan in their ROWD...that describes additional control measures or increased levels of existing control measures that will be implemented to prevent or reduce discharges of bacteria to storm drain systems to attain wasteload allocations.

The successful implementation of permit requirements during the term of the MRP and previous permit terms has provided San Mateo County Permittees with insight towards optimizing requirements in the reissued MRP. The recommended prioritized updates to the permit are based upon these lessons learned and are consistent with the following broader permit reissuance goals:

- Establish priorities based on lessons learned during implementation of the current MRP;
- Provide a balance between flexibility and enforceability;
- Identify and address unintended consequences associated with implementation of the current MRP requirements; and
- Continue to identify and secure state and federal grant resources to assist with local implementation.

Our recommended updates to permit requirements would help provide a more cost-effective approach towards improving stormwater quality and achieving the protection and enhancement of water quality in San Mateo County receiving waters. However, San Mateo County Permittees remain extremely concerned about the availability of resources to address requirements in the reissued MRP, including the uncertainty regarding the availability of resources to Permittees in the future. In particular, the ongoing Covid-19 pandemic will likely impact municipal budgets and available resources for the foreseeable future. San Mateo County Permittees therefore request that the Regional Water Board reissues the MRP in consideration of current economic factors and the reasonable protection of beneficial uses, consistent with the California Water Code 13241.

SMCWPPP and San Mateo County Permittee staff look forward to continuing to work with Regional Water Board staff on the development of a reissued MRP that addresses high priority stormwater quality issues in a cost-effective and practicable manner during the next permit term.

Should you have any questions regarding this ROWD submittal, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Matthew Fabry".

Matthew Fabry, P.E.
Program Manager

cc: Tom Mumley, Assistant Executive Officer, SFBRWQCB
Keith Lichten, Chief, Watershed Management Division, SFBRWQCB
SMCWPPP Stormwater Committee