

## 5.5 Ongoing Implementation of Best Management Practices

### 5.5.1 Overview of Stormwater Regulation in Daly City

Daly City has jurisdiction over, and maintenance responsibility for, their municipal separate storm sewer systems and watercourses that they own and operate in San Mateo County. The stormwater generated within Daly City, such as that of the Vista Grande watershed, is regulated by the San Francisco Bay Regional Water Quality Control Board (RWQCB) through a NPDES stormwater permit. In order for urban areas to discharge stormwater into San Francisco Bay or the Pacific Ocean, dischargers are required by the Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act to obtain a NPDES stormwater discharge permit. This chapter describes the NPDES permit structure in San Mateo County and the implementation of required components, including BMPs, by Daly City.

### 5.5.2 Regional NPDES Permit Coordination and Implementation

The NPDES stormwater discharge permit in San Mateo County is a single permit (No. CAS0029921), with 20 cities and the County listed as co-permittees of the permit. A county-wide stormwater management program called the San Mateo Countywide Stormwater Pollution Prevention Program (STOPPP) was created to coordinate implementation and compliance with NPDES requirements.

STOPPP is a consortium of local governments, represented by all 20 cities within San Mateo County and the County itself, partnering to implement stormwater-related activities and BMPs for their respective storm drain systems. As a co-permittee (discharger) on the NPDES permit, Daly City participates in the STOPPP program as well as implementing local source control and pollution prevention programs.

Regional STOPPP coordination and management is overseen by the City/County Association of Governments (C/CAG) of San Mateo County, a joint powers authority that acts on issues of regional significance to San Mateo County communities. Annual reporting on STOPPP activities is provided by C/CAG to the RWQCB, and is developed from and comprised of, semi-annual reporting documentation provided by each co-permittee, including Daly City. C/CAG has also established a NPDES Technical Advisory Committee (TAC), comprised of local municipal representatives with expertise in various fields related to stormwater including engineering, science, planning, environmental health, wastewater treatment, source control inspection, and public works administration. The TAC has established a number of subcommittees to help implement all of the program components of STOPPP. Daly City chairs the Commercial/Industrial/Illicit Discharge subcommittee.

Through STOPPP, Daly City participates in other regional collaborative efforts related to stormwater management including:

- Bay Area Stormwater Management Agencies Association (BASMAA) Monitoring Committee,
- Bay Area Macroinvertebrate Bioassessment Information Network
- San Francisco Estuary Regional Monitoring Program
- Clean Estuary Partnership

With program implementation and compliance, the San Mateo Countywide NPDES permit was, and can continually be, reissued to the communities participating in STOPPP. The success of the STOPPP partnership relies on the diligence of each community to implement required stormwater pollution prevention and control activities, including BMPs, in their local area.

### 5.5.3 STOPPP Stormwater Management Plan

To collectively demonstrate stormwater management implementation through STOPPP, C/CAG, and the San Mateo Countywide NPDES co-permittees have collaborated to develop a Stormwater Management Plan (SMP). The SMP for STOPPP guides participating communities, such as Daly City, with the implementation of stormwater control and pollution prevention activities, or a series of BMPs, and

enables them to meet the associated stormwater requirements for San Mateo County. More specifically, the SMP is intended to aid communities in the reduction of stormwater pollutants to the maximum extent practicable, and to effectively prohibit non-stormwater discharges into local storm drain systems and waterways.

Through the SMP, STOPPP has established baseline levels of effort and performance standards by which each discharger in San Mateo County must comply. The State recognizes the SMP as a comprehensive stormwater control program, and requires the SMP be implemented to meet the stated stormwater goals and objectives. Implementation requires that dischargers meet specified performance standards for each of the six program components through implementation of the BMPs in the SMP. These standards are a yard-stick by which the RWQCB can measure the effectiveness of STOPPP.

### **SMP Components**

The SMP is organized around six components that outline performance standards, including BMPs, for discharger compliance with the NPDES permit.

- **Municipal Maintenance** – This component includes standards for street sweeping, storm drain cleaning, parks and corporation yard maintenance and other maintenance-related activities in a way that minimizes pollutant discharges during these activities.
- **Commercial/Industrial/Illicit Discharge** – This component establishes measures for commercial and industrial facility inspection and educational outreach to eliminate illicit discharges to storm drains.
- **New Development and Construction** – This component includes standards to minimize impacts of land development on the beneficial use and water quality during and after construction, prohibit non-stormwater discharges from sites, reduce stormwater pollutant flow, require compliance with stormwater BMPs and erosion/sediment control at sites.
- **Integrated Pest Management** - Integrated pest management is a methodology to minimize the use of toxic pesticides. This component is typically incorporated into municipal operations as well as the Public Information/Participation component.
- **Public Information/Participation** – This component includes educating the public about causes of stormwater pollution and its environmental effects, encouraging public to use more environmentally-friendly practices related to stormwater management, and increasing public involvement in STOPPP activities. Daly City has developed number off public outreach activities, including Gateway Gardens (shown in Figure 5-31), which demonstrates Integrated Pest Management, recycled water, and other stormwater pollution prevention activities.
- **Watershed and Monitoring** – This component includes assessing water quality conditions to determine stormwater constituents of concern and developing plans to address these specific pollutants, and evaluating the effectiveness of BMPs utilized and examine the overall effectiveness of STOPPP.

Figure 5-31 Gateway Gardens



Each of these components contains a set of performance standards that are to be implemented by Daly City and all other co-permittees in order to comply with the San Mateo regional stormwater NPDES permit. The most recent STOPPP SMP (effective 2004-2010) that guides Daly City in its compliance efforts serves as the basis for the third NPDES permit reissued by the Regional Board to STOPPP. The updated SMP incorporates new RWQCB requirements related to Provision C.3, an amendment to the New Development and Construction component of the SMP, whose goal is to minimize impacts of land development on beneficial use and water quality during and after construction. Provision C.3 strengthens the New Development and Construction component requirements by identifying and implementing appropriate site design, source control, and stormwater treatment measures.

### **Performance Standards**

In order to achieve the goals and objectives of STOPPP, performance standards must be implemented by Daly City and all other co-permittees to demonstrate compliance with the countywide NPDES permit. Performance standards include BMPs, actions, and activities related to the execution of all required components of the SMP. The specific performance standards and BMPs that Daly City conforms to are described in detail in the SMP (City/County Association of Governments, 2004.) Utilizing its own staff (or other arrangements such as outside consultants), each co-permittee has the choice of how they will successfully implement and achieve the performance standards.

#### **5.5.4 Daly City Ongoing Implementation of Performance Standards, BMPs, and other NPDES Permit Requirements**

Daly City actively participates in STOPPP compliance efforts by implementing SMP components and performance standards, including BMPs, and providing necessary reporting information each period to C/CAG.

### **Daly City Implementation Approach**

As presented in Table 5-17, a number of departments from throughout the City are involved with implementation of all required components and associated performance standards of the SMP. Overall STOPPP implementation at Daly City is coordinated by the Director of Water and Wastewater Resources for Daly City. Furthermore, Daly City financially supports, and provides operation and maintenance for BMPs and other performance standard implementation. As with all other dischargers, Daly City adopts and enforces required ordinances, and implements component BMPs to aid in the overall control and reduction of stormwater pollution from San Mateo County.

**Table 5-17: Daly City Stormwater Implementation Team**

<b>STOPPP Components</b>	<b>City Department Responsible For Implementation</b>
Municipal maintenance	Department of Public Works
Commercial/industrial/illicit discharge	Department of Water and Wastewater Resources
New development and construction	Department of Economic and Community Development
Integrated pest management	Department of Parks and Recreation
Public information/participation	Department of Water and Wastewater Resources
Watershed and monitoring	Department of Water and Wastewater Resources

### **Ongoing Implementation of SMP Performance Standards and NPDES Requirements**

Daly City demonstrates its compliance with the requirements of the SMP and the NPDES permit through its participation in STOPPP and through its semi-annual submittals to STOPPP for countywide annual reporting. The details of the most recent Daly City participation in STOPPP, performance standard and BMP implementation, and compliance with the NPDES permit can be found in the STOPPP Fiscal Year 2004/2005 Annual Report, dated August 31, 2005. (City/County Association of Governments, 2005.) Table 5-18 presents a summary of some of the representative activities that have been undertaken by Daly City related to SMP requirements including BMPs, actions and activities in Fiscal Year 2004/2005.

**Table 5-18: Summary of Daly City’s Ongoing Implementation of Stormwater BMP, Activities, and Actions Related to the STOPPP SMP for Fiscal Year 2004/2005**

SMP Component	Daly City Compliance Status with SMP and NPDES Permit	Representative 2004-2005 BMPs and Other Activities
Municipal Maintenance	In compliance	<ul style="list-style-type: none"> <li>• Trained maintenance staff on BMPs through attendance at BMP workshops</li> <li>• Developing stormwater pollution prevention plans for corporation yards</li> <li>• Conducted sediment management and removal at corporation yards</li> <li>• Continued ongoing street sweeping, litter control, and maintenance activities for storm drainage facilities</li> <li>• Participated in STOPPP working group meetings</li> </ul>
Commercial / Industrial / Illicit Discharge	In compliance	<ul style="list-style-type: none"> <li>• Chaired sub committee, and participated in working group meetings</li> <li>• Performed educational visits to provide BMP info to contractors and residents before illicit discharges occur</li> <li>• Conducted both regular and random inspections for stormwater control compliance; with over 200 inspections occurring in 2004</li> <li>• Performed illicit discharge inspections and responded to calls for inspections as part of ongoing inspection program</li> <li>• Completed source identification forms based on collected illicit discharge information</li> <li>• Compiled summary of stormwater inspections and violations</li> <li>• Distributed informational brochures during inspections and made brochures available during permit issuance for contractors for demolition</li> </ul>
New Development and Construction	In compliance	<ul style="list-style-type: none"> <li>• Designated staff from the Department of Economic and Community Development to oversee implementation of this component</li> <li>• Developed specific stormwater conditions of approval, including construction and post construction stormwater control measures</li> <li>• Developed modifications to the development review process to incorporate stormwater approvals throughout all phases of the review process including during conceptual review, plan submittal, CEQA assessment, design review, plan check, and permit issuance phases</li> <li>• Reviewed and analyzed existing site design standards and guidance for inclusion in the development review process</li> <li>• Completed Operation and Maintenance Information of Stormwater Treatment Measures forms and Impervious Surface Data Collection worksheets</li> <li>• Promoted San Francisco Estuary Project’s/Regional Board’s General Construction Site Management workshop on erosion and sediment controls</li> <li>• Conducted review and analysis and implementation of local site design standards and guidance in accordance with Provision C.3.j of STOPPP permit amendment dated February 19, 2003</li> <li>• Instituted pesticide reduction is a condition of approval for development and significant redevelopment</li> </ul>
Integrated Pest Management	In compliance	<ul style="list-style-type: none"> <li>• Attended annual training on current IPM performance standards, policy and techniques, and BMPs, and attended spray applicator workshops</li> <li>• Restricted pesticide usage (to last resort) and documented usage</li> <li>• Implemented a Model Integrated Pest Management policy</li> <li>• Adopted an IPM Policy/Ordinance</li> <li>• Ensured that City contractor follows existing IPM techniques, which will be updated in next contractual period</li> <li>• Implementation of hand weed control and mowing for Parks Department maintenance activities</li> <li>• Participated in subcommittee working group meetings, trainings, and activities</li> </ul>

SMP Component	Daly City Compliance Status with SMP and NPDES Permit	Representative 2004-2005 BMPs and Other Activities
Public Information and Participation	In compliance	<ul style="list-style-type: none"> <li>• Attended and participated in subcommittee meetings</li> <li>• Purchased 1000 thermoplastic markings to replace existing stencils in FY 05/06.</li> <li>• Conducted a mercury thermometer exchange program</li> <li>• Creation of Gateway Gardens which public information by show casing Integrated Pest Management, recycled water, and other stormwater and pollution management activities.</li> <li>• Provided a pharmaceutical waste drop-off</li> <li>• Conducted school outreach activities related to stormwater education</li> <li>• Co-sponsored and promoted Coastal Clean-up Day, and Make a Difference Day</li> <li>• Staffed STOPPP booth at San Mateo County Fair</li> <li>• Sent direct mail letters to commercial property managers about catch basin cleaning of parking lots, corridors, etc.</li> <li>• Demonstrated proper storm drain cleaning for Public Works Week</li> <li>• Continued to supported and promote Household Hazardous Waste Programs</li> <li>• Created an IPM demonstration garden</li> <li>• Developed public outreach materials to accompany utility bills including materials on IPM, pet waste disposal, and street sweeping</li> <li>• Contributed education messages and articles on stormwater for the Website/Fogcutter Newsletter</li> <li>• Continued distribution of IPM, BMP, &amp; Pollution Prevention Materials</li> <li>• Participation in Bay Area Pollution Prevention Group</li> </ul>
Watershed and Monitoring (WAM)	Countywide requirement / Regional effort	<ul style="list-style-type: none"> <li>• Participation on WAM subcommittee</li> <li>• Continued support and involvement in several regional activities through participation in WAM subcommittee including:</li> <li>• Development of watershed assessment reports for watersheds throughout San Mateo County</li> <li>• Development of plans to address specific pollutants of concern through San Mateo County</li> <li>• Participation in Bay Area Stormwater Management Agencies Association (BASMAA) monitoring committee</li> <li>• Participation in the San Francisco Estuary (SFE) Regional Monitoring Program</li> <li>• Participation in the Clean Estuaries Partnership</li> </ul>

### 5.5.5 Recommendations for Ongoing BMP Implementation Related to Vista Grande Watershed Study

As part of the implementation of the long-term components in the Vista Grande Watershed Study, it is intended that Daly City will continue to implement BMPs and other activities in compliance with San Mateo Countywide SMP and NPDES permit. Ongoing implementation of BMPs by Daly City under the countywide NPDES will include those related to municipal maintenance, commercial/industrial/illicit discharge, new development and construction, integrated pest management and watersheds and monitoring.

As part of provision C.3 of the countywide NPDES permit, Daly City will continue to include conditions of approval in permits for applicable new development and redevelopment projects. The timing of C.3 provisions and projects to which they apply are summarized in Table 5-19.

**Table 5-19 Projects Affected by C.3 Provisions for the San Mateo Countywide NPDES permit.**

Project Types		Timing
Group 1 Projects	Commercial, industrial, or residential developments that create one acre (43,560 square feet) or more of impervious surface, including roof area, streets and sidewalks.	February 15, 2005
	Streets, roads, highways, and freeways that are under the Dischargers' jurisdiction and that create one acre (43,560 square feet) or more of new impervious surface.	
	Significant Redevelopment projects defined as a projects on a previously developed site that results in addition or replacement, which combined total 43,560 ft <sup>2</sup> or more of impervious surface on such an already developed site	
Group 2 Projects	The Group 2 Project definition is in all ways the same as the Group 1 Project definition above, except that the size threshold of impervious area for new and Significant Redevelopment projects is reduced from one acre (43,560 ft <sup>2</sup> ) of impervious surface to 10,000 square feet.	August 15, 2006

The goal of the C.3 requirements is to address pollutant discharges and changes in runoff flows from new development and significant redevelopment projects, through implementation of post-construction and treatment measures, source control, and site design measures, to the maximum extent practicable. BMPs related to the C.3 provision in the countywide permit may include implementation of design characteristics to maximize infiltration where appropriate, providing landscape characteristics that slow runoff and maximize potential detention or retention, and minimization of impervious land cover.

In the Bay Area, small storms, such as those with the two-year recurrence interval, produce approximately eighty percent of the total annual rainfall (BASMAA, 1999) BMPs, which are not designed for flood protection but which address stormwater from these smaller storm events, can help manage water quality and quantity to address a large part of the overall stormwater produced by the Vista Grande watershed. As such, ongoing implementation of BMPs in compliance with the San Mateo Countywide Stormwater NPDES permit is an important component for long-term implementation of the Vista Grande Watershed Study.