



Municipal Regional Permit
National Pollution Discharge Elimination System
City of East Palo Alto
ANNUAL REPORT 2015-2016



CITY OF EAST PALO ALTO

OFFICE OF THE CITY MANAGER

2415 University Avenue • East Palo Alto, CA 94303

September 30, 2016

**Mr. Bruce H. Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612**

Subject: City of East Palo Alto FY 15/16 Annual report

Dear Mr. Wolfe,

This letter and Annual Report with attachments is submitted by The City of East Palo Alto pursuant to Permit Provision C.16.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2009-0074, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of compliance activities conducted during FY 2015/16 and related accomplishments.


With the updated MRP 2.0 release in January 2016, the City of East Palo Alto has identified deficiencies in the Long Term Trash Load Reduction Plan which will require remedy during the current Fiscal Year 2016/2017 to reach targeted trash reduction requirements which are enforceable by the Water Board. The City has included a schedule of implementation by which, under the leadership of our team, should prove to ensure the City meets or exceeds the requirement of 70% reduction in trash loading throughout the City prior to July 1, 2017. The City intends to update the Trash Load Reduction Plan and implement full trash capture in targeted areas to meet this deadline.

Certification Statement

I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted, is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

The City remains committed to full compliance with the Municipal Regional Permit 2.0 and is actively working to prevent pollutants from entering our storm water system. If you have any questions about our Clean Bay Program, please contact Ms. Michelle Daher at (650) 853-3189 or via email at mdaher@cityofepa.org .

Sincerely,

 9/30/16

Carlos Martinez
City Manager

FY 2015-2016 Annual Report

Permittee Name: [City of East Palo Alto](#)

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Section 1 – Permittee Information

Background Information					
Permittee Name:	City of East Palo Alto				
Population:	31,000				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2015-0049				
Reporting Time Period (month/year):	July 1, 2015 through June 30, 2016				
Name of the Responsible Authority:	Kamal Fallaha			Title:	Public Works Director
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3117		Fax Number:	650-853-3179	
E-mail Address:	kfallaha@cityofepa.org				
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle Daher			Title:	Management Analyst
Department:	Community and Economic Development				
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3197		Fax Number:	650-853-3179	
E-mail Address:	mdaher@cityofepa.org				

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

During FY 15/16, the City of East Palo Alto has 1) participated in the San Mateo County Program's Municipal Maintenance Subcommittee; 2) Participated in the trash full capture device O&M inspection and municipal maintenance data management roundtable discussion on June 16, 2016; 3) began development of a trash full capture device O&M inspection/maintenance data management program. 4) Reduced City Municipal Maintenance Corporation Yard-specific operations to reduce pollution potential, including replacement of gasoline powered equipment with electrically powered equipment to reduce fuel spills and leaks and associated air quality improvements and disposal of unused/non operational equipment which reduced leaks and potential for stormwater pollution. The City also maintained both the O'Connor Pump Station, resulting in the removal of over 30 years of buildup of sediment and silt deposited in the forebay, and entered a final phase of dredging and maintenance of the Runnymede drainage ditch and settling pond, which included wetland mitigation and removal of build up of silt and sediment to return flows back to the original design capacity (this project is not finalized due to unforeseen utility conflicts which require re-design of the sanitary sewer system running through a portion of the drainage system. Due to endangered species breeding season and delays for design of the unplanned utility conflict, this project is still ongoing).

See the Municipal Maintenance Subcommittee members' only webpage (<http://www.flowstobay.org/privatemunimaintenance>) for the attendance lists and more information on the June 1 site tour and June 16 roundtable. Refer to the C.2 Municipal Operations section of the Program's FY 15-16 Annual Report (if applicable) for a description of activities implemented at the countywide and/or regional level.

C.2.a. ► Street and Road Repair and Maintenance

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of debris and waste materials during road and parking lot installation, repaving or repair maintenance activities from polluting stormwater
Y	Control of concrete slurry and wastewater, asphalt, pavement cutting, and other street and road maintenance materials and wastewater from discharging to storm drains from work sites.
Y	Sweeping and/or vacuuming and other dry methods to remove debris, concrete, or sediment residues from work sites upon completion of work.

Comments:

These standard operating procedures were initiated in FY 2012/2013. Annual "5 minute BMP" training is conducted to remind staff of these protocols and provide any updates to practices and improvements.

C.2.b. ► Sidewalk/Plaza Maintenance and Pavement Washing

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of wash water from pavement washing, mobile cleaning, pressure wash operations at parking lots, garages, trash areas, gas station fueling areas, and sidewalk and plaza cleaning activities from polluting stormwater
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Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs
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Comments: **The City has taken action to ensure all fueling stations and pressure washing activities are conducted with controls implemented to ensure potential stormwater discharges are eliminated.**

C.2.c. ► Bridge and Structure Maintenance and Graffiti Removal

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

Y	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
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Y	Control of discharges from graffiti removal activities
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Y	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
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Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
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Y	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
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Y	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
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Comments: **The City has taken to utilizing on-site vacuum capture techniques for removal of mobilized materials around bridges, pump station outfalls, and graffiti activities. Most graffiti removal activities include techniques that require hands-on applications such as scrubbing and painting to minimize potential stormwater and air quality impacts that other techniques such as sand blasting may cause.**

C.2.e. ► Rural Public Works Construction and Maintenance

Does your municipality own/maintain rural¹ roads: ☐ Yes ☒ No

If your answer is **No** then skip to **C.2.f.**

Place a **Y** in the boxes next to activities where applicable BMPs were implemented. If not applicable, type **NA** in the box and provide an explanation in the comments section below. Place an **N** in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.

<input type="checkbox"/>	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
<input type="checkbox"/>	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
<input type="checkbox"/>	No impact to creek functions including migratory fish passage during construction of roads and culverts
<input type="checkbox"/>	Inspection of rural roads for structural integrity and prevention of impact on water quality
<input type="checkbox"/>	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
<input type="checkbox"/>	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
<input type="checkbox"/>	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings

Comments including listing increased maintenance in priority areas:

¹Rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing or open space uses.

C.2.f. ► Corporation Yard BMP Implementation

Place an **X** in the boxes below that apply to your corporations yard(s):

<input type="checkbox"/>	We do not have a corporation yard
<input type="checkbox"/>	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit
<input checked="" type="checkbox"/>	We have a Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s)

Place an **X** in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system
<input checked="" type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants

Comments:

Guidance: The City of East Palo Alto conducts routine inspections to ensure the City's Corporation Yard is pollutant free. During FY 15/16, the City has taken further action to reduce pollution potential by purchasing new power equipment that operates with electricity rather than hydrocarbons to reduce potential for fuel spills and reduce potential for airborne pollutant emissions. Further reductions of non-operational or outdated equipment have been made to reduce the amount of potential maintenance required for leaking or otherwise pollutant-prone vehicles. There have also been reductions of storage materials related to stockpiling for as-needed projects, by reducing the product quantity being ordered and stored on-site so that the amount of material is consistent with the anticipated amount required for on a monthly basis, job-specific, or as-needed quantities, rather than ordering larger quantities that would provide materials for the entire year. While this has resulted in higher immediate material costs as there is no large-quantity discount, it has reduced the overall maintenance of previously oversized stockpiles.

If you have a corporation yard(s) that is not an NOI facility, complete the following table for inspection results for your corporation yard(s) or attach a summary including the following information:

Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions
150 Tara Road	September 11, 2015	Street sweeping debris management issues being resolved. HHW storage issues being resolved.	Update contract with street sweeping company to address debris management Contact Paint Care and SMCEH to deal with HHW

			illegal dumping materials.
Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions
150 Tara Road	April 11, 2016	Street sweeping debris management issues are resolved. HHW storage issues being resolved.	New RFP with street sweeping company to address debris management Ongoing Paint Care and SMCEH assistance to deal with HHW illegal dumping materials disposal.

Section 3 - Provision C.3 Reporting New Development and Redevelopment

**C.3.a. ► New Development and Redevelopment Performance
Standard Implementation Summary Report**

(For FY 15-16 Annual Report only) Provide a brief summary of the methods of implementation of Provisions C.3.a.i.(1)-(8).

Summary:

- **(1) The City of East Palo Alto's legal authority to implement C.3 falls under the City's Municipal Code 13.12.100 - Reduction of pollutants and supplemental runoff in stormwater, and more specifically, 13.12.105 - Development design requirements**, which generally states: "Best Management Practices (BMPs) for New Developments and In-Fill Projects. Any construction contractor performing work in the city shall implement erosion control measures on-site to retain all debris, dirt and pollutants, and prevent the pollutants from flowing into the city's storm drain system. The city manager or designee may adopt regulations establishing controls on the volume and rate of stormwater runoff from new developments and in-fill projects as appropriate to minimize the discharge and transport of pollutants". This provision provides legal authority to not only meet MRP 2.0 C.3 requirements, but also allows restricted flows from new developments to pre-project levels or less to control peak flows into the City's stormwater system, as approximately 49% of the parcels within the City are within the FEMA 100 year flood inundation zone.
- **(2) Municipality's development review and permitting procedures, including use of conditions of approval or other enforceable mechanisms.** All projects are required to meet the requirements within the MRP 2.0 permit and most requirements imposed on projects exceed this compliance level. The City uses modifications of co-permittee prepared SMCWPPP standard conditions of approval on pre-applications, through plan review cycles of all projects that are beyond the scope of a single family dwelling and require external modifications to the property, and building permit applications that result in land disturbance. Projects such as tenant improvements and small additions are exempt. Expansion of single family homes, single family homes not part of a new larger development, and garage conversions tend to be exempt, although most often even these projects have requirements to restrict stormwater runoff, due to the City's generally overwhelmed stormdrain system and high propensity for flooding. All expansions including secondary dwellings and "in law units" receive source control and guidance on reducing impervious surface areas, with encouragement to utilize pervious materials for sidewalks and driveways, while enhancing outdoor drought tolerant vegetation and planting trees. Very small projects that would modify less than 1,000 square feet of land may be required to capture all stormwater from the site to reduce the discharge of stormwater to the City system, to reduce the burden on the existing stormdrain system. As the entire permit team is located in the same building, it is easy to address projects on an individual basis, and provide easy to understand language for the standard applicant, while providing in depth project review for larger "regulated" projects.
- **(3) How water quality effects and mitigation measures are addressed in environmental reviews (e.g., CEQA)**
The City has requirements in the Ravenswood Specific Plan EIR (adopted in that calls to mitigate localized pollution in the groundwater and soil by enhancing the stormwater controls beyond those requirements set by the Water Board) wherein, storm water upgrades are required as part of the Specific Plan in order to address the flooding issues within the project limits. These upgrades include a new system, identified as the Ravenswood System, which will be a supplement to the existing Runnymede System and a new force main system for the 391 Demeter Street development which would redirect runoff to the south towards Runnymede, the current primary drainage system for the City. The language also details that the stormwater compliance shall meet "[t]he most restrictive C-3 requirements shall be used for the design of post constructions stormwater management systems for projects... include[ing] employing Best Management Practices

(BMPs) for and during construction," The City has reviewed projects with consistency, requiring that the sites within the Specific Plan are provide green infrastructure enhancement opportunities, while capping existing pollutants of concern, along streets that do not meet the "regulated project. Status, to enhance pollutant reuptake in areas considered old industrial, which are likely to contain pollutants of concern, primarily within the Ravenswood Specific Plan area. Most recently, the City has enhanced language that will require property owners to dedicate land in the Specific Plan Area to put towards Green Infrastructure and flood control enhancements, to create an enhanced waterway through the inclusion of active transportation elements, improve the existing tree canopy, and provide bio-treatment of stormwater runoff with lined systems that will not interact with the underlying native soils, which will reduce the ability for recharge.

Three additional EIRs are planned within the City during FY 16/17 and these updated

- **(4) C.3 training for appropriate departments During FY 15/17, four new staff persons attended National NPDES training and six new staff persons have received ongoing in-house inspection training.** The City has a new Assistant City Manager, Public Works Inspector, Building Inspector, three new Code Enforcement Officers, a new Chief Building Official, a new Planning Manager, two new Assistant Planners, a new Senior Engineer, and has lost several previously trained staff persons. As the City rebuilds staffing levels, stormwater compliance training, among other training needs, has been ongoing for all staff persons as the new staffing has provided an opportunity to better integrate the stormwater compliance requirements into all Community and Economic Development Department areas. Staff has been receiving ongoing in-house inspection training and has attended available countywide program trainings. Integration of the stormwater compliance program throughout all divisions is an ongoing goal for FY 16/17.
- **(5) Outreach/education efforts to staff, developers, contractors, construction site operators and owner/builders:** The Community and Economic Development Department has integrated development review committee meetings and developer pre-application meetings with stormwater compliance education, wherein stormwater compliance receives a high degree of focus assisting the entire group with understanding that pollution prevention and collaboration is a preferred method of compliance, while enforcement is an ultimate requirement should voluntary compliance not be met. This has been widely accepted and appreciate, with some exceptions which have resulted in stop-work orders by the City's code enforcement team.
- **(6) How your municipality encourages site design measures at unregulated projects subject to Planning/Building Department review:** The City of East Palo Alto urges new project proponents to first consider source control in planning sites, to reduce the amount of stormwater that will be generated, as shown in item #7 below. For the stormwater that cannot be addressed through source control measures, the proponent must show that they will mitigate their site stormwater discharge by designing stormwater catchment that will retain the first flush and peak flows, while doing whatever is possible to treat stormwater flows prior to discharge into the City stormdrain system. This is generally handled throughout the planning process, starting with the pre-application, where possible.
Many sites throughout the City lack stormdrains entirely, and standing water in roadways and in front of homes after an average storm event is commonplace. Many applicants, including projects under 1,000 square feet, request tips on how to reduce the issue of standing water. The City's planners have been trained in providing reference materials for pervious hardscape surfaces and enhanced vegetation, along with trench type retention systems that will provide enhanced stormwater storage capacity on private developments. The City's Engineering team typically requires on-site detention for new additions or expansions, requiring the reduction in the amount of water being discharged into the City stormdrain system due to stormdrain capacity issues—usually requiring the retention of a ten year, 24 hour storm event. This authority is codified in the City's municipal code to reduce the overall flood impacts plaguing the City. Due to the high prevalence of soil and groundwater contamination, many bioretention and treatment systems are required to be lined, preventing infiltration—however, due to the high groundwater table in many areas throughout the City, infiltration is often infeasible.

The City also requires that applicants provide design measures that exclude potential contaminants from entering the stormwater system, including covers and berms for trash container enclosures, among others.

▪ **(7) How your municipality encourages source control measures at unregulated projects subject to Planning/Building Department review;**

The City requires on all projects stenciling or marking storm drains with messages “No Dumping, Flows to Bay”. Incorporating designs for landscapes that minimize irrigation needs and water run-off, minimize the need for pesticide and fertilizer use, and incorporate sustainable landscape design and maintenance practices. Including roofs or covers for material storage areas, loading docks, repair/maintenance bays, and fueling areas, as well as for trash (dumpster areas), food waste, or food compactor enclosures.

▪ **(8) General Plan revisions (if needed) to integrate water quality/watershed protection with water supply, flood protection, habitat protection, groundwater recharge, and other sustainable development principles and policies. Include dates of General Plan revisions.**

The City has recently finalized the EIR for the General Plan for the City through 2035 available at: <http://vista2035epa.org/>. The Final EIR indicates an integrated effort to protect for community and environmental health, including surface water, stormwater, groundwater and reliable drinking water, to include substantial habitat protection.

With serious water scarcity in the City, water supply has been of utmost importance to the community in FY 15/16. The City is establishing a Groundwater Monitoring Plan, to coincide with the finalized 2015 Groundwater Management Plan to protect the San Mateo Plain sub-basin of the greater Santa Clara Valley Basin, as the City seeks approval for two groundwater wells (one new, and one existing with a new proposed well head treatment system under design) and seeks to keep continuous water balance for the basins output with the anticipated withdrawal from the basin. Issues identified for necessary monitoring include reducing the potential for any of the following: lowering of groundwater levels, reduction of groundwater storage, salt/saline water intrusion, degraded water quality, land subsidence, and surface water depletions with adverse impacts to beneficial uses. While a Groundwater Sustainability Plan is not required at this time and will likely not be required until January 31, 2022, it is likely that the San Mateo County Plain sub-basin will begin work on this sooner, with East Palo Alto likely to take the lead.

With high levels of legacy soil contamination, and a substantial flood inundation zone representing ~50% of the community, potential for groundwater recharge is a concern and needs to be studied more in-depth to determine areas where recharge of the groundwater aquifer would indeed warrant desired benefits. Recharge is yet another layer of understanding the greater sub-basin, and will likely involve Flood Protection is being channeled through the Safer Bay process, a San Mateo County led project that would provide a protective system that allows integrated habitat protection while enhancing protection from sea level rise from the Bay. Efforts are currently underway to provide a large portion of the City with 100 year flood protection east of highway 101 through the San Francisquito Creek Phase I project, which the Water Board has permitted and is imminently under construction. Upstream of highway 101, San Francisquito Creek is designated as a potential park and recreation area in the general plan update, and is conserved a great asset for community sustainability with potential for water quality enhancements, watershed protection, and , water supply protections, flood protections and habitat protections will be greatly supported through future development efforts that will seek to trap legacy contaminants under caps, and remediate groundwater contamination, while promoting habitat protection through the cleanup of isolated, unmaintained properties that host illegally dumped stockpiles of materials including pollutants of concern, and homeless encampments which further degrade local wetlands and newly establishing habitat areas. Were feasible, mitigation will call to increase the tree canopy of the City to assist with stormwater uptake and enhancing bicycle and pedestrian facilities to reduce the reliance on automotive transportation, with an emphasis on lane reduction, rather than expansion. Additional General Plan policy recommendations are indicated for reducing illegal dumping and addressing household hazardous waste and solid waste with more successful strategies.

C.3.b.iv.(2) ► Regulated Projects Reporting

Fill in attached table **C.3.b.iv.(2)** or attach your own table including the same information.

C.3.c.ii ► Design Specifications for Pervious Pavement Systems

(For FY 2015-16 Annual Report only). Submit design specifications for pervious pavement systems that have been developed and adopted on a regional or countywide basis. If design specifications have been adopted and are contained in a Countywide stormwater handbook, include a reference to the handbook.

Summary:

The City of East Palo Alto is following the design specifications included in the SMCWPPP C.3 Stormwater Technical Guidance, revised draft June 2016.

C.3.e.iv. ► Alternative or In-Lieu Compliance with Provision C.3.c.

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?

<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
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Comments (optional): **The City worked with this site, 2485 Pulgas Avenue, a 51 unit housing subdivision that had already received Final Map approval, to voluntarily shift from underground storage vaults to full LID. This change required a section of the driveway to be treated with LID on an adjacent trail owned by the City, but maintained by the HOA of the development for the life of the project. While this may be arguably be considered an Alternative Compliance due to the bioretention area being outside the property boundaries of the project, it was approved due to the fact that the trail is was already being maintained by the HOA for the project and was a condition of the project being built. The section of this publicly accessible trail is fenced off and is considered part of the subdivision's responsibility. The bioretention area is hydraulically connected to this site.**

C.3.e.v ► Special Projects Reporting

1. In FY 2015-16, has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		Yes	X	No
2. In FY 2015-16, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the C.3.b.iv.(2) Table, and the C.3.e.v. Table.		Yes	X	No
If you answered "Yes" to either question, 1) Complete Table C.3.e.v. 2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project.				

C.3.h.v.(2) ► Reporting Newly Installed Stormwater Treatment Systems and HM Controls (Optional)

On an annual basis, before the wet season, provide a list of newly installed (installed within the reporting year) stormwater treatment systems and HM controls to the local mosquito and vector control agency and the Water Board. The list shall include the facility locations and a description of the stormwater treatment measures and HM controls installed.

See attached Table **C.3.h.v.(2)** for list of newly installed Stormwater Treatment Systems/HM Controls.

C.3.h.v.(3)(a) –(c) and (f) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Option 1 – Reporting Site Inspections		Number/Percentage
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the previous fiscal year (FY14-15)		10
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the reporting period (FY 15-16)		12
Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 15-16)		2

Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 15-16)	20%²
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C.3.h.v.(3)(d)-(e) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.

Summary: **Most systems were fully functional. Some minor issues include erosion or rills forming in the bioretention areas near the curb cuts. Corrective measures included having maintenance place additional energy dissipaters such as cobbles. Other issues include vegetation that is dying off likely due to the heat and extended drought. Some plants required replacement. Other issues include unwanted plants “volunteering” in the bioretention systems resulting in weeds becoming established, resulting in major overhaul requirements.**

Provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).

Summary: **The O&M Program is effective—especially during these drought years. The City has inspected bioretention areas that have occasional dead plants inside due to insufficient watering, likely due to the ongoing drought conditions.**

C.3.i. ► Required Site Design Measures for Small Projects and Detached Single Family Home Projects

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.

Summary:

- **BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Permittees. We have modified local ordinances/policies/procedures and forms/checklists to require all applicable projects approved after December 1, 2012 to implement at least one of the site design measures listed in Provision C.3.i.**

² Based on the number of Regulated Projects in the database or tabular format at the end of the previous fiscal year (FY 14-15), per MRP Provision C.3.h.ii.(6)(b).

C.3.j.i.v.(d) ► Green Infrastructure Outreach

On an annual basis, provide a summary of your agency's outreach and education efforts pertaining to Green Infrastructure planning and implementation.

Summary:

Please refer to the SMCWPPP FY 15-16 Annual Report for a summary of outreach efforts implemented by the Program. The City participates in the Green Infrastructure Sub-committee to provide input on the Green Infrastructure Planning process, which the City will be able to prepare the GIP by the MRP 2.0 deadline.

The City has appraised the City Council of the GIP requirements through the adoption of the Capital Improvements Program and will continue to include the City Council when it is necessary to adopt the GIP. The City has also prepared future developers of property that will be the first to implement the GIP of the upcoming requirements and provided comments on pre-application submittals requiring GIP enhancements along key areas of upcoming redevelopment areas.

C.3.j.ii.(2) ► Early Implementation of Green Infrastructure Projects

On an annual basis, submit a list of green infrastructure projects, public and private, that are already planned for implementation during the permit term and infrastructure projects planned for implementation during the permit term that have potential for green infrastructure measures. Include the following information:

- A summary of planning or implementation status for each public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. (see C.3.j.ii.(2) Table B - Planned Green Infrastructure Projects).
- A summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. For any public infrastructure project where implementation of green infrastructure measures is not practicable, submit a brief description of the project and the reasons green infrastructure measures were impracticable to implement (see C.3.j.ii.(2) Table A - Public Projects Reviewed for Green Infrastructure).

Background Information:

Describe how this provision is being implemented by your agency, including the process used by your agency to identify projects with potential for green infrastructure, if applicable.

The City has targeted the Ravenswood Specific Plan for immediate implementation of the Green Infrastructure Plan as this is an area known as an old industrial land use, which has been verified as likely having PCBs in the soil, among other potential pollutants of concern. There are several updated roads and possibly new roadways that are anticipated in this area and it is prone to being built-out as a major office campus. It is also a bayside property and is prone to ease of discharge to legacy pollutants, which makes it an excellent opportunity area to implement green infrastructure plans in the early phase. Furthermore, it is next to the Bay Trail and Cooley Landing Park, which makes adding in walking and pedestrian accessibility ideal for encouraging active enjoyment of the area. Finally, there is virtually no stormdrain system in the area, and permitting and installation is quite expensive, which makes integrating biosystems that slow the flow of stormwater and detain it an attractive option to address stormwater flow for the future development of the area.

Summary of Planning or Implementation Status of Identified Projects:

See attached Tables C.3.j.ii.(2)-A and C.3.j.ii.(2)-B for the required information.

C.3.j.iii.(2) ► Participate in Processes to Promote Green Infrastructure

On an annual basis, report on the goals and outcomes during the reporting year of work undertaken to participate in processes to promote green infrastructure.

Please refer to the SMCWPPP FY 15-16 Annual Report for a summary of efforts conducted to help regional, State, and federal agencies plan, design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects.

C.3.j.iv.(2) ► Tracking and Reporting Progress

On an annual basis, report progress on development and implementation of methods to track and report implementation of green infrastructure measures and provide reasonable assurance that wasteload allocations for TMDLs are being met.

Please refer to the SMCWPPP FY 15-16 Annual Report for a summary of methods being developed to track and report implementation of green infrastructure measures.

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 1) – Projects Approved During the Fiscal Year Reporting Period

Project Name Project No.	Project Location ⁹ , Street Address	Name of Developer	Project Phase No. ¹⁰	Project Type & Description ¹¹	Project Watershed ¹²	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ¹³	Total Replaced Impervious Surface Area (ft ²) ¹⁴	Total Pre- Project Impervious Surface Area ¹⁵ (ft ²)	Total Post- Project Impervious Surface Area ¹⁶ (ft ²)
Private Projects											
Due to a water shortage, the City has a Building Permit moratorium; no projects were approved during this FY.	Due to a water shortage, the City has a Building Permit moratorium; no projects were approved during this FY.	None approved.	None approved.	None approved.	None approved.	None approved.	None approved.	None approved.	None approved.	None approved.	None approved.
Public Projects											
No Projects Approved during this reporting period.	No Projects Approved during this reporting period.	No Projects Approved during this reporting period.	None	No Projects Approved during this reporting period.	No Projects Approved during this reporting period.	None	None	No Projects Approved during this reporting period.	No Projects Approved during this reporting period.	No Projects Approved during this reporting period.	No Projects Approved during this reporting period.
Comments: The City continues to design Capital Improvement Projects but none were approved during this FY. The City has a water shortage and is pursuing increased water allocations or groundwater prior to future development approval. As such, there were no projects approved by the Planning Commission for development in this report period.											

⁹Include cross streets

¹⁰If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

¹¹Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

¹²State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

¹³All impervious surfaces added to any area of the site that was previously existing pervious surface.

¹⁴All impervious surfaces added to any area of the site that was previously existing impervious surface.

¹⁵For redevelopment projects, state the pre-project impervious surface area.

¹⁶For redevelopment projects, state the post-project impervious surface area.

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (private projects)										
Project Name Project No.	Application Deemed Complete Date ¹⁷	Application Final Approval Date ¹⁸	Source Control Measures ¹⁹	Site Design Measures ²⁰	Treatment Systems Approved ²¹	Type of Operation & Maintenance Responsibility Mechanism ²²	Hydraulic Sizing Criteria ²³	Alternat ive Compli ance Measur es ^{24/25}	Alternative Certification ²⁶	HM Controls ^{27/28}
Private Projects										
Due to a water shortage, the City has a Building Permit moratorium, no projects were approved during this FY.	Due to a water shortage, the City has a Building Permit moratorium, no projects were approved during this FY.	Due to a water shortage, the City has a Building Permit moratorium, no projects were approved during this FY.	None	None	None	None	None	None	None	None

¹⁷For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁸For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁹List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²⁰List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

²¹List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

²²List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners' association; O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

²³See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

²⁴For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

²⁵For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

²⁶Note whether a third party was used to certify the project design complies with Provision C.3.d.

²⁷If HM control is not required, state why not.

²⁸If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (public projects)

Project Name Project No.	Approval Date ²⁹	Date Construction Scheduled to Begin	Source Control Measures ³⁰	Site Design Measures ³¹	Treatment Systems Approved ³²	Operation & Maintenance Responsibility Mechanism ³³	Hydraulic Sizing Criteria ³⁴	Alternative Compliance Measures ^{35/36}	Alternative Certification ³⁷	HM Controls ^{38/39}
Public Projects										
No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY	No Regulated Public Projects to report for this FY
Comments: Several Capital Improvement Projects are under Planning review and near full design. However, none have been fully approved during this reporting period.										

²⁹For public projects, enter the plans and specifications approval date.

³⁰List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

³¹List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

³²List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

³³List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

³⁴See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

³⁵For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

³⁶For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

³⁷Note whether a third party was used to certify the project design complies with Provision C.3.d.

³⁸If HM control is not required, state why not.

³⁹If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.h.v.(2). ► Table of Newly Installed⁴⁰ Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

Fill in table below or attach your own table including the same information.

Name of Facility	Address of Facility	Party Responsible ⁴¹ For Maintenance	Type of Treatment/HM Control(s)
Montage/ Edenbridge Homes/ DKB Homes—51 Unit Subdivision	2485 PULGAS AVENUE, EAST PALO ALTO, CA	HOA	5-Infiltration Trenches 6- Bioretention Areas 6 -Flow-Through Planters
Menlo Park Fire Protection District (MPFPD) Fire Station #2	2290 University Avenue East Palo Alto, CA	MPFPD	1- Storm Water Drop Inlet with Diverter Valve 1-Stormdrain Manhole with Contech System Filter Cartridges 1-Storm Water Tank Detention Basin 2-Bioretention Landscaped Areas 2-Trench Drains

⁴⁰ “Newly Installed” includes those facilities for which the final installation inspection was performed during this reporting year.

⁴¹State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v.Special Projects Reporting Table												
Reporting Period – July 1 2015 - June 30, 2016												
Project Name & No.	Permittee	Address	Application Submittal Date ⁴²	Status ⁴³	Description ⁴⁴	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category ⁴⁵	LID Treatment Reduction Credit Available ⁴⁶	List of LID Stormwater Treatment Systems ⁴⁷	List of Non-LID Stormwater Treatment Systems ⁴⁸
No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report	No Projects to report

⁴²Date that a planning application for the Special Project was submitted.

⁴³Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.

⁴⁴Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

⁴⁵For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

⁴⁶For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.

⁴⁷List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.

⁴⁸List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

Special Projects Narrative

The City had no Special Projects approved during this or any prior MRP 1.0 Permit period.

C.3.j.ii.(2) ► Table A - Public Projects Reviewed for Green Infrastructure				
Project Name and Location ⁴³	Project Description	Status ⁴⁴	GI Included? ⁴⁵	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement ⁴⁶
Rail Spur	Extended capping of former rail spur between Pulgas Avenue and Bay Road.	Complete	No	This project required the capping in place of materials that were formerly considered clean, along segments of the mostly capped Rail Spur. However, further testing just prior to Water Board release of the project indicated that various spots along the trail were still too high for public safety. The City and Edenbridge (developer) considered replacing stormdrain inlets with bioretention areas or sheet flow to adjacent landscaping but due to the existing impervious surface and the grade, this was not feasible. The contamination and removal/replacement of existing stormdrains was deemed substantially infeasible and high risk due to likely disturbance of contaminants.

C.3.j.ii.(2) ► Table B - Planned Green Infrastructure Projects			
Project Name and Location ⁴⁷	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Bay Road	Bay road upgrade, utility replacement and stormdrain enhancement	Planning. Design is at ~65% for the roadway improvements; not a Regulated Project but will be considered for GI “no missed opportunities”. Future development projects, currently in the pre-planning phase, will be required to provide land that will enable GI for the area from Pulgas Avenue to Cooley Landing, as well as streets that are perpendicular to Bay Road.	Considering inclusion of the following: <ul style="list-style-type: none"> • Full trash capture • Lined system (due to high pollution load from two adjacent superfund sites) • LID with underdrain • Bicycle/pedestrian improvements, possibly class I facilities • Trees • Possible monitoring wells to determine pre- and post- treatment water quality

⁴³ List each public project that is going through your agency’s process for identifying projects with green infrastructure potential.

⁴⁴ Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.

⁴⁵ Enter “Yes” if project will include GI measures, “No” if GI measures are impracticable to implement, or “TBD” if this has not yet been determined.

⁴⁶ Provide a summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. If review of the project indicates that implementation of green infrastructure measures is not practicable, provide the reasons why green infrastructure measures are impracticable to implement.

⁴⁷ List each planned (and expected to be funded) public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. Note that funding for green infrastructure components may be anticipated but is not guaranteed to be available or sufficient.

Section 4 – Provision C.4 Industrial and Commercial Site Controls

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

During FY 15/16, the City updated the facilities lists within the Business Inspection Plan; 2) conducted business inspections of high priority sites; 3) conducted stormwater compliance training of new Code Enforcement and Public Works Inspector; 4) participated in the Program's CII Subcommittee; 5) improved coordinated inspection efforts with San Mateo County Environmental Health.

Refer to the C.4. Industrial and Commercial Site Controls section of the SMCWPPP FY 15-16 Annual Report (if applicable) for a description of Program activities.

C.4.b.iii ► Potential Facilities List:

San Mateo County Environmental Health

List below or attach your list of industrial and commercial facilities in your Inspection Plan to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.

Street Number	Street Name	City	Name
922	NEW BRIDGE	EAST PALO ALTO	NEW BRIDGE MARKET
1950	UNIVERSITY	EAST PALO ALTO	JUST LUNCH
2050	UNIVERSITY	EAST PALO ALTO	FOUR SEASONS HOTEL
1950	UNIVERSITY	EAST PALO ALTO	SF SOUP CO
1741	BAYSHORE	EAST PALO ALTO	TOGOS/BASKIN ROBBINS
1761	BAYSHORE	EAST PALO ALTO	OFFICE DEPOT #978
2368	CLARKE	EAST PALO ALTO	EASTSIDE MARKET
2235	COOLEY	EAST PALO ALTO	COOLEY AVENUE MARKET
1700	BAYSHORE	EAST PALO ALTO	IKEA EAST PALO ALTO
951	OCONNOR	EAST PALO ALTO	RAVENSWOOD CHILD DEVELOPMENT CT
1286	RUNNYMEDE	EAST PALO ALTO	ASPIRE EAST PALO ALTO CHARTER SCHOOL
2106	OAKWOOD	EAST PALO ALTO	OAKWOOD MARKET INC

2373	UNIVERSITY	EAST PALO ALTO	LAS ADELITAS RESTAURANT & MEAT MKT
1781	Bayshore	East Palo Alto	The Home Depot Store #6603
2220	UNIVERSITY	EAST PALO ALTO	THREE BROTHERS TACOS
1491	BAYSHORE	EAST PALO ALTO	TAQUERIA LOS TEMOS
1781	BAYSHORE	EAST PALO ALTO	OCEANNA CAFE
1745	BAYSHORE	EAST PALO ALTO	STARBUCKS COFFEE CO 5977
1493	BAYSHORE	EAST PALO ALTO	ONE STOP MARKET
2387	UNIVERSITY	EAST PALO ALTO	LA ESTRELLITA
2695	FORDHAM	EAST PALO ALTO	COSTANO ELEMENTARY SCHOOL
2101	University	East Palo Alto	CHEVRON SERVICE STATION #1081
2535	PULGAS	EAST PALO ALTO	TOUCHATT TRUCKING
1721	Bayshore	East Palo Alto	McDonald's
1701	BAYSHORE	EAST PALO ALTO	TACO BELL
2390	CLARKE	EAST PALO ALTO	TAQUERIA LA CAZUELA
2086	CLARKE	EAST PALO ALTO	BRENTWOOD SCHOOL
2350	RALMAR	EAST PALO ALTO	CESAR CHAVEZ ACADEMY
2450	RALMAR	EAST PALO ALTO	LOS ROBLES MAGNET ACADEMY
325	DEMETER	EAST PALO ALTO	CATERED TOO
2401	University	East Palo Alto	McDonald's
218	DEMETER	EAST PALO ALTO	PITCHER DRILLING CO
2398	UNIVERSITY	EAST PALO ALTO	NEVERIA Y PALETERIA LAS DELICIAS
2398	UNIVERSITY	EAST PALO ALTO	EL SABOR MICHOCANO
2398	UNIVERSITY	EAST PALO ALTO	PAL MARKET
2398	UNIVERSITY	EAST PALO ALTO	CARNICERIA RODRIQUEZ

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Permittee Name: East Palo Alto

C.4 – Industrial and Commercial Site Controls

335	Demeter	East Palo Alto	ILLINOIS PURDUE PUMP STA
560	BELL	EAST PALO ALTO	EAST PALO ALTO SENIOR CENTER
2150	UNIVERSITY	EAST PALO ALTO	MI PUEBLITO
1760	BAYSHORE	EAST PALO ALTO	THREE BROTHERS TACOS
77	NEWELL	EAST PALO ALTO	SEVEN ELEVEN FOOD STORE #14336 E
1489	BAYSHORE	EAST PALO ALTO	EMMANUEL PIZZA & BAKERY INC
1905	BAY	EAST PALO ALTO	CAL SPRAY INC
255	DEMETER	EAST PALO ALTO	GLOBAL STEEL FABRICATORS, INC.
2000	Bay	East Palo Alto	PG&E: COOLEY LANDING SUBSTATION
2160	EUCLID	EAST PALO ALTO	RAVENSWOOD CITY SCHOOL DIST
1900	UNIVERSITY	EAST PALO ALTO	WELLS REIT II-UNIVERSITY CIRCLE
150	TARA	EAST PALO ALTO	EPA CORP YARD
2560	PULGAS	EAST PALO ALTO	OUR COMMON GROUND
1045	WEEKS	EAST PALO ALTO	HEW DRILLING
75	DEMETER	EAST PALO ALTO	J'S PRODUCT PAINTING CO INC
1870	BAYSHORE	EAST PALO ALTO	ACE FIRE EQUIPMENT & SVC CO INC
1880	BAYSHORE	East Palo Alto	CAVALLINO COLLISION CENTER
2194	University	East Palo Alto	E PALO ALTO SHELL
2160	University	East Palo Alto	AUTOZONE #3302
1900	University	East Palo Alto	AT&T Mobility - FOREST AVE-CENTER DR (47675)
2050	UNIVERSITY	EAST PALO ALTO	FOUR SEASONS HOTEL
350	DEMETER	EAST PALO ALTO	CARLOS AUTO REPAIR
1765	BAYSHORE	EAST PALO ALTO	WINGSTOP RESTAURANT
2033	PULGAS	EAST PALO ALTO	RONALD MCNAIR SCHOOL

2290	UNIVERSITY	EAST PALO ALTO	FIRE STATION #2	
550	BELL	EAST PALO ALTO	BELL ST PARK SWIMMING POOL	
1050	MYRTLE	EAST PALO ALTO	EAST PALO ALTO ACADEMY	
1043	MYRTLE	EAST PALO ALTO	EASTSIDE COLLEGE CAFETERIA	
1180	OCONNOR	EAST PALO ALTO	OCONNOR PUMP STATION	
1849	BAY	EAST PALO ALTO	LLANOS AUTO REPAIR	
2530	PULGAS	EAST PALO ALTO	CEO STEEL FABRICATION INC	
2526	PULGAS	EAST PALO ALTO	A 1 AUTO SERVICE & TOWING	
1175	WEEKS	EAST PALO ALTO	TORRES PRINTEX	
2091	BAY	EAST PALO ALTO	INFINITY SALVAGE	
160	Demeter	East Palo Alto	PARKING CO OF AMERICA	
1933	PULGAS	EAST PALO ALTO	GARDEN SUPERMARKET	
1765	BAYSHORE	EAST PALO ALTO	JAMBA JUICE #1131	
1421	BAY	EAST PALO ALTO	CREATIVE MONTESSORI LEARNING CENTER	
1895	BAYSHORE	EAST PALO ALTO	UNA FIGURA PERFECTA	
2220	UNIVERSITY	EAST PALO ALTO	IZZY BROOKLYN BAGELS	
510	OCONNOR	EAST PALO ALTO	LA TIENDITA MARKET	

C.4.b.iii ► Potential Facilities List:
City of East Palo Alto

List below or attach your list of industrial and commercial facilities in your Inspection Plan to inspect that could reasonably be considered to cause or contribute to pollution of stormwater runoff.

<u>Priority Level</u>	<u>Facility Name</u>	<u>Facility address</u>	<u>Type of Business</u>	<u>Year of Inspection</u>	<u>Last Inspection</u>
Medium	Cavallino Collision Repair	1880 W Bayshore Rd	Automotive	2016/17	2012/13
Medium	Winston Taylor	1195 Garden	Construction (home based)	2016/17	2014/15
Medium	Oasis Painting	2374 Palo Verde Ave	Home Based Mobile	2016/17	2014/15
Medium	Menlo Food Corp	175 Demeter	Referred CEH	2016/2017	2013/2014
Medium	Rainer's Service Station	1905 East Bayshore Road	tires	2016/2017	2013/2014
Medium	LA FAMILIA DISCOUNT	1803 BAY ROAD	retail	2016/2017	2014/2015
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2016/2017	2014/2015
Medium	Mitchell's Carpet Cleaning	252 Azalea	Home Based Business	2016/2017	2014/2015
Low	PUBLIC STORAGE INC.	1961 E. BAYSHORE RD	storage	2016/2017	2013/2014
Low	Bridge Property Management	1969 Tate Street	residential high density apartments	2016/2017	2013/2014
High	Higuerra's Hauling	2519 Pulgas Ave (confirm)	Hauling	2016/2017	2015/2016
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2016/2017	2015/2016
HIGH	SPECIALTY TOWING AND RECOVERY INC	2666 MIDDLEFIELD RD #B	Towing	2016/2017	2015/2016

Medium	SUNRISE ENTERPRISE 87, INC	264 TARA ST	Towing	2016/2017	2015/2016	
HIGH	Toubar Equipment, CS Trucking, JDP recycling, Touchatt Trucking	2535 Pulgas Ave (Shared site)	automotive	2016/2017	2015/2016	
Medium	Parking Company of America	160 Demeter St	Fleet/Auto	2016/2017	2013-2014	
High	The Home Depot	1781 E. Bayshore	Retail/Nursery	2016/2017	2015/2016	
Medium	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive	2016/2017	2015/2016	
Medium	ARTEAGA AUTO CLEANING AND DETALLING	867 Weeks St	mobile auto	2016/2017	2015/2016	
High	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2016/2017	2015/2016	
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	2016/2017	2015/2016	
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2016/2017	2015/2016	
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2016/2017	2015/2016	
Medium	Ana's Party Store	910 Newbridge St	retail	2017/2018	2015/2016	
Medium	Wing Stop Jamba Juice Cummings Loft	1765 E. Bayshore Rd	Food	2016/2017	2015/2016	
Medium	Carlos Auto	350 Demeter	automotive	2016/2017	2015/2016	
Medium	Las Aldelitas	2373 university Ave	food/stormwater	2016/2017	2015/2016	
Medium	La Estrellita	2387 University Ave	food/stormwater	2016/2017	2015/2016	

Medium	Global Steel	255 Demeter	Industrial	2016/2017	2015/2016
Medium	Mi Pueblo	1731 E. Bayshore	food/stormwater	2016/2017	2015/2016
Medium	Osegueres Hauling (Check for new hauling businesses)	2520 Pulgas	Hauling/trucking	Closed	2015/2016
Medium	A's Towing	1885 Bay Road	Towing/Automotive	2016/2017	2015/2016
High	Infinite Auto	2091 Bay Road	Wrecking/Auto	2016/2017	2015/2016
High	Starbucks	1745 E Bayshore	food (stormwater issues)	2016/2017	2015/2016
Low	PGA Superstore	1751 E. Bayshore Rd	Retail	2016/2017	2012/2013
High	CalSpray	1905 Bay Road	Industrial	2016/2017	2012/2013
Medium	RE Bormann's Steel C	2450 Pulgas Ave	Industrial	2017/2018	2015/2016
Low	Nordstrom Rack	1771 E. Bayshore Rd	Retail	2017/2018	2015/2016
Low	WOODLAND ARMS APARTMENTS EQR	466 O'Keefe mke Riley 566-2013	residential high density apartments	2018/2019	2013/2014
Low	MONTEREY APARTMENTS	1838 W. BAYSHORE STREET	apartments	2018/2019	2013/2014
Low	COLONIAL APARTMENTS	1483 VIA CONTENTA CT.	apartments	2018/2019	2013/2014
Low	EUCLID AVENUE APARTMENTS	1910-1950 EUCLID AVE	apartments	2018/2019	2013/2014
Low	LEITRIM HOUSE APARTMENTS	275 EAST O'KEEFE STREET	apartments	2018/2019	2013/2014
Low	WOODLAND ARMS APARTMENTS	1717 WOODLAND AVE	apartments	2018/2019	2013/2014
Low	PARK APARTMENTS	280 EAST O'KEEFE STREET #D	apartments	2018/2019	2013/2014
Low	RUNNYMEDE GARDENS	2301 COOLEY AVENUE	apartments	2018/2019	2013/2014
Low	TRADEWINDS APARTMENTS	C/O BRUCE SWENSON	apartments	2018/2019	2013/2014

Low	Residential Home Rental (property owner hired contractor)	2260 Euclid	Residential Sanitary Sewer Plumbing	One-time issue	2014/2015	
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C.4.d.iii.(1)(a) ► Facility Inspections:
San Mateo County Environmental Health

Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.

<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.

	Number	Percent
Number of businesses inspected	29	
Total number of inspections conducted	31	
Number of violations (excluding verbal warnings)	1	
Sites inspected in violation	1	3.4%
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	1	100%

Comments:

1) Sites are considered in violation if there is substantial evidence that a stormwater discharge would be imminent should a rainfall occur. We count report all violations on a site as a single violation for reporting purposes.
 2) All violations were resolved in a timely manner, with one exception which is ongoing with.
 There is a large discrepancy between the City and County percentage of sites inspected which are found in violation. This can be attributed to the fact that the businesses in the SMCEH program have largely been in the program for multiple years and have been more fully educated in the stormwater compliance best management practices, while those in the City's program tend to be either referred by complaint or newer businesses that have less formal experience with stormwater compliance, resulting in a much higher non-compliance issue.

C.4.d.iii.(1)(a) ► Facility Inspections:
City of East Palo Alto

Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.

<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.

	Number	Percent
Number of businesses inspected	20	
Total number of inspections conducted	24	
Number of violations (excluding verbal warnings)	4	
Sites inspected in violation	4	17%
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	4	100%

Comments:

1) Sites are considered in violation if there is substantial evidence that a stormwater discharge would be imminent should a rainfall occur. We count report all violations on a site as a single violation for reporting purposes.

2) All violations were resolved in a timely manner, with all threatened or potential discharges immediately resolved.

There is a large discrepancy between the City and County percentage of sites inspected which are found in violation. This can be attributed to the fact that the businesses in the SMCEH program have largely been in the program for multiple years and have been more fully educated in the stormwater compliance best management practices, while those in the City's program tend to be either referred by complaint or newer businesses that have less formal experience with stormwater compliance, resulting in a much higher non-compliance issue.

C.4.d.iii.(1)(b) ► Frequency and Types/Categories of Violations Observed
San Mateo County Environmental Health

Fill out the following table or attach a summary of the following information.

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	
Potential discharge and other	1

Comments:

In a single incident, one school campus had an issue with excessive trash due to an uncovered trash bin. This issue was resolved upon reinspection.

C.4.d.iii.(1)(b) ► Frequency and Types/Categories of Violations Observed

City of East Palo Alto

Fill out the following table or attach a summary of the following information.

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	1
Potential discharge and other	3
Comments: In a single incident, discharge of sand to stormdrain inlet. Inlet was immediately cleaned and materials were removed. Inlet does not discharge to a waterbody and has no outlet.	

C.4.d.iii.(1)(b) ► Frequency and Type of Enforcement Conducted

City of East Palo Alto

Fill out the following table or attach a summary of the following information.

	Enforcement Action (as listed in ERP) ⁴⁸	Number of Enforcement Actions Taken	% of Enforcement Actions Taken ⁴⁹
Level 1	Verbal Warning / Written Notice/Minor Violation—Return to Compliance		
Level 2	Warning Notice or Administrative Action or Stop Work Notice	3	12%
Level 3	Administrative Action with Penalty and/or Cost Recovery	1	4%
Level 4	Legal Action		
Total		4	17%

⁴⁸ Agencies to list specific enforcement actions as defined in their ERPs.

⁴⁹ Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

C.4.d.iii.(1)(b) ► Frequency and Type of Enforcement Conducted
San Mateo County Environmental Health

Fill out the following table or attach a summary of the following information.

	Enforcement Action (as listed in ERP) ⁵⁰	Number of Enforcement Actions Taken	% of Enforcement Actions Taken⁵¹
Level 1	Verbal Warning / Written Notice/Minor Violation—Return to Compliance	1	3.4%
Level 2	Warning Notice or Administrative Action or Stop Work Notice		
Level 3	Administrative Action with Penalty and/or Cost Recovery		
Level 4	Legal Action		
Total		1	3.4%

C.4.d.iii.(1)(b) ► Frequency and Type of Enforcement Conducted
City of East Palo Alto

Fill out the following table or attach a summary of the following information.

	Enforcement Action (as listed in ERP) ⁵²	Number of Enforcement Actions Taken	% of Enforcement Actions Taken⁵³
Level 1	Verbal Warning / Written Notice/Minor Violation—Return to Compliance		
Level 2	Warning Notice or Administrative Action or Stop Work Notice	3	12%
Level 3	Administrative Action with Penalty and/or Cost Recovery	1	4%
Level 4	Legal Action		
Total		4	17%

⁵⁰ Agencies to list specific enforcement actions as defined in their ERPs.

⁵¹ Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

⁵² Agencies to list specific enforcement actions as defined in their ERPs.

⁵³ Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

C.4.d.iii.(1)(c) ► Types of Violations Noted by Business Category
San Mateo County Environmental Health

Fill out the following table or attach a summary of the following information.

Business Category ⁵⁴	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Automotive (may be home based)		
Mobile Business/Home Based (not automotive)		
Light Industrial		
Food, Health, Restaurant or Market		1

C.4.d.iii.(1)(c) ► Types of Violations Noted by Business Category
City of East Palo Alto

Fill out the following table or attach a summary of the following information.

Business Category ⁵⁵	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Automotive (may be home based)		3
Mobile Business/Home Based (not automotive)		
Light Industrial	1	
Food, Health, Restaurant or Market		

C.4.d.iii.(1)(d) ► Non-Filers

List below or attach a list of the facilities required to have coverage under the Industrial General Permit but have not filed for coverage:

The Menlo Food Corp on Demeter is not on the San Mateo County Environmental Health list of potential dischargers. The City is working with the County to determine whether this company should be included in the Food health inspections.

⁵⁴List your Program's standard business categories.

⁵⁵List your Program's standard business categories.

C.4.e.iii ► Staff Training Summary						
Training Name	Training Dates	Topics Covered	No. of Industrial/ Commercial Site Inspectors in Attendance	Percent of Industrial/ Commercial Site Inspectors in Attendance	No. of IDDE Inspectors in Attendance	Percent of IDDE Inspectors in Attendance
Industrial Commercial Inspector Stormwater Training	June 1, 2016	Business and Industrial inspections Background on MRP	4	100%	4	100%
In-house training	Ongoing	Complaint response, Form Completion, Visual inspections, Enforcement Response Plan, Business Inspection Plan, appropriate BMPs, etc.	4	100%	4	100%
Comments: The City's Code Enforcement and Public Works team has begun training during the end of FY 15/16. Now that the City has fully staffed, there is going to be a more robust coordinated effort on Business Inspections.						

Section 5 – Provision C.5 Illicit Discharge Detection and Elimination

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Provide background information, highlights, trends, etc.

Summary:

The City participates in the SMCWPPP CII Subcommittee. There has been some progress in illicit discharge at the corner of Manhattan Avenue and Woodland Avenue at San Francisquito Creek, the City has seen a marked reduction in illicit dumping of hazardous materials into the creek, most likely attributed to the "flood wall" installation. This is being considered to prevent future illicit dumping into San Francisquito Creek. The City Council authorized a subcommittee to look at solid waste issues that will include illicit discharge and illegal dumping issues that are increasingly frequent throughout the City attributed to residents who are moving due to the high cost of housing, as well as those who are living in personal and recreational vehicles throughout the City, along roadways. This subcommittee includes two Public Works and Transportation Commission representatives and two City Council representatives, as well as appropriate staff from various departments throughout the City.

Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 15-16 Annual Report (if applicable) for description of activities at the countywide or regional level.

C.5.c.iii ► Complaint and Spill Response Phone Number

List below or attach your complaint and spill response phone number

Flows to Bay Illicit Discharge Coordinator: Michelle Daher 650-521-6616/ Jay Farr 650-250-0308 (after hours)

Code Enforcement Complaints: 650-853-5940

Provide your complaint and spill response web address, if used

<http://www.ci.east-palo-alto.ca.us/index.aspx?nid=160>

Is a screen shot of your website showing the central contact point attached?

☒

Yes

☐

No

If No, explain: <http://www.flowstobay.org/reportpollution>

Provide a discussion of how the central contact point (complaint and spill response phone number and, if used, web address) is being publicized to your staff and the public.

Staff knows that the illicit discharge coordinator is Michelle Daher. They refer all complaints to this individual. In her absence, the Code Enforcement team and Maintenance Division step in. This is advertised by word of mouth and on the City's website.

C.5.d.iii.(1), (2), (3) ► Spill and Discharge Complaint Tracking

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)

	Number	Percentage
Discharges reported (C.5.d.iii.(1))	0	
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(2))	1	
Discharges resolved in a timely manner (C.5.d.iii.(3))	0	0%

Comments:

There were 1053 incidents of illegal dumping during this reporting period. Of those illicit discharges reported, all of them were associated with automotive home based maintenance activities and illegal dumping. As such, these issues are reported through the Code Enforcement Department. The City is in the process of updating the City's website to note the change of communication with the public. There was one incident where paint was dumped directly into the San Francisquito Creek. Due to the complexity of unidentified substances, the City had to refer this to the Fire Department, which is trained and has equipment to identify and remove the materials. A majority of these materials were paint, but there were substances that could not be readily identified and some of the paint containers were rusted and had a serious potential of disintegrating if moved. Removal of much of the material required the Hazardous Materials specialists to address it safely. Due to the location of the dumping, removal of the material from the creek was challenging and required a two week delay prior to removal. However, no rain occurred during the time the materials were identified within the creek bed and when they were removed from the creek bed.

The City has already reported these issues in the CII section due to the relationship with potential home based businesses.

There are also a number of illegally dumped hazardous waste materials, which are picked up by the Maintenance team when they are witnessed on the side of the roadway, or when a call comes in regarding illegal dumping. All calls are funneled through the Code Enforcement team and sent to appropriate individuals within the City.

C.5.f.iii ► MS4 Map Availability

Discuss how you make your MS4 map available to the public and how you publicize the availability of the MS4 map.

The City has the map and maintenance plan on the City's website at: <http://www.ci.east-palo-alto.ca.us/index.aspx?nid=498> and a hard copy is located in the Permit Center. MS4 maps are also available to the public on the Oakland Museum Creek Mapping Project website (<http://explore.museumca.org/creeks/crkmap.html>). These maps include municipal storm drains that measure 24 inches or greater in diameter.

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(1) ► Hillside Development Criteria		
What criteria is your agency using to determine hillside development areas?	<input checked="" type="checkbox"/> Local criteria such as maps of hillside development areas or other written criteria	<input checked="" type="checkbox"/> The permit definition of projects on sites with ≥ 15% slope
Attach a copy of hillside development area maps or provide your written criteria below, if applicable.		
Description: By either criteria the City of East Palo Alto does not have any hillside construction.		

C.6.e.iii.2.a, b, c ► Site/Inspection Totals		
Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.1.a)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.b)	Total number of storm water runoff quality inspections conducted (include only High Priority Site and sites disturbing 1 acre or more) (C.6.e.iii.1.c)
# 0	# 2	# 22
Comments: 1) The City conducts monthly inspections at the Sobrato construction site, and the Montage residential subdivision, each has a NOI with the Water Board. 2) The City also conducted inspections as-needed at various other construction sites in the City which were not on high priority sites and not reported herein.		

C.6.e.iii.2.d ► Construction Activities Storm Water Violations		
Guidance: Do not leave any cells blank.		
BMP Category	Number of Violations ⁵⁶ excluding Verbal Warnings	% of Total Violations ⁵⁷
Erosion Control	1	50%
Run-on and Run-off Control	0	0
Sediment Control	0	0
Active Treatment Systems	0	0
Good Site Management	1	50%
Non Stormwater Management	0	0
Total⁵⁸		100%

⁵⁶Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category. For example, if during one inspection at a site, there are 2 erosion control violations, only 1 violation would be counted for this table.

⁵⁷Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

⁵⁸The total number of violations may count more than one violation per inspection, since some inspections may result in violations in more than one category. For example, during one inspection of a site, there may have been both an erosion control violation and a sediment control violation. For this reason, the total number of violations in this table may not match the total number of enforcement actions reported in Table C6.e.iii.1.e.

C.6.e.iii.2.e ► Construction Related Storm Water Enforcement Actions

Guidance: Do not leave any cells blank.

	Enforcement Action (as listed in ERP) ⁵⁹	Number Enforcement Actions Issued	% Enforcement Actions Issued ⁶⁰
Level 1 ⁶¹	Verbal Warning / Written Notice/Minor Violation—Return to Compliance	2	100%
Level 2	Warning Notice or Administrative Action or Stop Work Notice	0	0
Level 3	Administrative Action with Penalty and/or Cost Recovery	0	0
Level 4	Legal Action	0	0
Total			100%

C.6.e.iii.2.f, g ► Illicit Discharges

Guidance: Do not leave any cells blank.

	Number
Number of illicit discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.f)	0
Number of sites with discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.g)	0

⁵⁹Agencies should list the specific enforcement actions as defined in their ERPs.

⁶⁰Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

⁶¹For example, Enforcement Level 1 may be Verbal Warning.

C.6.e.iii.2.h, i ► Violation Correction Times		
	Number	Percent
Violations (excluding verbal warnings) fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	0	% ⁶²
Violations (excluding verbal warnings) not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	0	% ⁶³
Total number of violations (excluding verbal warnings) for the reporting year⁶⁴	0	100%
Comments: All violations were verbal warnings corrected on-site at the time of the inspection.		

C.6.e.iii.(4) ► Evaluation of Inspection Data
Describe your evaluation of the tracking data and data summaries and provide information on the evaluation results (e.g., data trends, typical BMP performance issues, comparisons to previous years, etc.).
Description: Due to low volume construction during FY 15/16, very few inspections were conducted. Of those conducted, the contractors implemented compliance immediately during the time of the inspection.

C.6.e.iii.(4) ► Evaluation of Inspection Program Effectiveness
Describe what appear to be your program's strengths and weaknesses, and identify needed improvements, including education and outreach.
Description: Compliance with stormwater construction BMPs have become much more consistent. The building inspector is trained in stormwater compliance and has offered reminders on a frequent basis so that the monthly inspections are merely a matter of routine. Due to the building moratorium, restricting new development to existing water meter service only, there has been substantially fewer construction projects and primarily just three major construction projects which have been inspected on a monthly basis. Refer to the C.6 Construction Site Control section of SMCWPPP FY 15-16 Annual Report) for a description of Program and regional activities.

⁶²Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.

⁶³Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.

⁶⁴The total number of violations reported in the table of Violation Correction Times equals the number of initial enforcement actions, i.e., this assumes one violation is issued for several problems during an inspection at a site. The total number of violations in the table of Violation Correction Times may not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

C.6.f ► Staff Training Summary				
Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	
In-House Stormwater Construction Training	As available	BMPs, plan review,		

Section 7 – Provision C.7. Public Information and Outreach

C.7.b.i.1 ► Outreach Campaign

Summarize outreach campaign. Include details such as messages, creative developed, and outreach media used. The detailed outreach campaign report may be included as an attachment. If outreach campaign is being done by participation in a countywide or regional program, refer to the separate countywide or regional Annual Report.

See Section 7 and Section 9 of the SMCWPPP FY 15-16 Annual Report for a description of activities conducted at Countywide level.

C.7.c. Stormwater Pollution Prevention Education

Local stormwater phone number(s)

Code Enforcement (during normal business hours from 8am-4pm): 650-853-5940
Non-Emergency Dispatch: (after normal business hours or weekends): 650-321-1112

Local/Regional stormwater website(s)

<http://flowstobay.org/>

The City of East Palo Alto has information available to the public about NPDES program located here:

<http://www.ci.east-palo-alto.ca.us/index.aspx?NID=508>

See The C.7 Public Information and Outreach section of SMCWPPP 15-16 Annual Report.

C.7.d ► Public Outreach and Citizen Involvement Events

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.
 Use the following table for reporting and evaluating public outreach events

[See the C.7 Public Outreach and Citizen Involvement Events section of SMCWPPP FY 15-16 Annual Report for a summary of activities.](#)

Event Details	Description (messages, audience)	Evaluation of Effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional.	Identify type of event (e.g., school fair, creek clean-up, storm drain stenciling, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscope presentation, pesticides, stormwater awareness)	Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as: <ul style="list-style-type: none"> • Success at reaching a broad spectrum of the community • Number of participants compared to previous years. • Post-event effectiveness assessment/evaluation results • Quantity/volume of materials cleaned up, and comparisons to previous efforts
Earth Day	About 3 dozen people participated in Earth Day, learning about the special flood hazards in East Palo Alto, as well as ways they can prevent stormwater pollution and conserve water. An Enviroscope was offered for play with children, pesticide information was provided regarding OWOW literature, and a litter cleanup was offered for anyone wanting volunteer opportunities.	The program was a success because many residents raved about the event which also included a mariachi band and folk dancers. The amount of materials that were taken were just a few dozen watershed color books and OWOW outreach about bees and ants, which were popular with guests.
Clean Zones	An average of 20-30 residents converge each month in an area of their choosing to clean up the City by removing litter in areas identified by the community as heavily	This program is quite effective, albeit not widely known. The City's goal is that there will be more publicity for this program because it is so effective at educating and engaging the

	<p>polluted. This monthly activity is managed through the Police Department through a local grant. Local organizations can earn a stipend for participation, which is usually between \$150-\$300, depending on the size of the group. These funds can be used at the group's discretion. During these Clean Zone events, residents are provided with outreach about solid waste service and educated about illegal dumping of household materials and litter.</p>	<p>community. Publication of this information has been luke-warm due to unsure funding. The City hopes to have a secure funding source to provide these monthly cleanup stipends in the future.</p>
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Permittee Name: [City of East Palo Alto](#)**C.7.e. ► Watershed Stewardship Collaborative Efforts**

Summarize watershed stewardship collaborative efforts and/or refer to a regional report that provides details. Describe the level of effort and support given (e.g., funding only, active participation etc.). State efforts undertaken and the results of these efforts. If this activity is done regionally refer to a regional report.

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:

[See the C.7 Watershed Stewardship Collaborative Efforts section of SMCWPPP FY 15-16 Annual Report for a summary of activities.](#)

C.7.f. ► School-Age Children Outreach

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment.

Use the following table for reporting school-age children outreach efforts.

[See the C.7 School-Age Children Outreach section of SMCWPPP FY 15-16 Annual Report for a summary of activities. Please also see the Palo Alto Regional Water Control Plant Annual Report for more details on the programs listed below.](#)

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Provide the following information: Name Grade or level (elementary/ middle/ high)	Brief description, messages, methods of outreach used	Provide number or participants	Provide agency staff feedback. Report any other evaluation methods used (quiz, teacher feedback etc.). Attach evaluation summary if applicable.
Elementary	Outreach to school-age children is implemented through ZunZun assemblies at local elementary schools and the “Watershed Watchers” program at the Environmental Education Center at the Don Edwards San Francisco Bay Wildlife Refuge (Refuge) in Alviso.	The Program sponsors up to 50 ZunZun assemblies at elementary schools in Santa Clara Valley and funds an Interpretive Specialist position	The Fourth Quarter “Watershed Watchers” Report including the End-of-Year summary is included in the Program Annual Report Appendix 7-7. The Final ZunZun

Permittee Name: [City of East Palo Alto](#)

		at the Refuge for conducting activities and programs about watershed and urban runoff pollution prevention; this also includes a significant portion of East Palo Alto, which is a service area to these programs.	Report and Teacher Evaluation Report are included in the Program Annual Report Appendix 7-8. See section C.7 of the Program's Annual Report for ZunZun and other County-wide school outreach events.
Elementary and Middle School.	<p>This successful program transitioned in January 2016 to a team of educators from the local non-profit Grassroots Ecology. In 2016, additional budget has been added to provide 20 additional classes and related outreach in underserved schools. In addition, the curriculum will be revised this summer with the goal to:</p> <ul style="list-style-type: none"> • Make the introduction more interactive and tailored to each lesson; • Improve the flow and speed of the “Bugs” program through numbering puzzle pieces and ensuring the content is more cohesive throughout the activity; • Change the “Bags” activity to a role-playing game and update the text to include recent developments in plastics regulation and research; • Produce “visuals” including images to go with the “Who Dirtied the Bay” activity so students more easily see what their classmates are adding to the “bay;” • Create hand-outs for students such as information for parents on proper local disposal of household. 	The goal for classroom program delivery for the 2015-2016 school year was 115 presentations for 3,000 students in the service area of East Palo Alto, Los Altos, Los Altos Hills, Mountain View, Palo Alto and Stanford. The RWQCP exceeded this goal and provided 145 programs to 3,820 students in the RWQCP service area.	The average teacher rating for the school year was 4.9 out of 5 both for quality of program and clarity of presenter. In addition, teachers stated that students in 96% of classes showed an increased understanding of the difference between the storm drain and the sewer systems and of what they can do to prevent water pollution.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a. ► Implement IPM Policy or Ordinance								
Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?					X	Yes		No
If no, explain:								
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphates, pyrethroids, carbaryl, and fipronil. A separate report can be attached as evidence of your implementation.								
Trends in Quantities and Types of Pesticides Used⁶⁵								
Pesticide Category and Specific Pesticide Used	Amount ⁶⁶							
	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21		
Organophosphates	0							
Product or Pesticide Type A	0							
Product or Pesticide Type B	0							
Pyrethroids	0							
Product or Pesticide Type X	0							
Product or Pesticide Type Y	0							
Carbamates	0							
Product or Pesticide Type X	0							
Product or Pesticide Type Y	0							
Fipronil	0							
Product or Pesticide Type X	0							
Product or Pesticide Type Y	0							
Indoxacarb	Reporting not required							

⁶⁵Includes all municipal structural and landscape pesticide usage by employees and contractors.

⁶⁶Weight or volume of the product or preferably its active ingredient, using same units for the product each year. Please specify units used. The active ingredients in any pesticide are listed on the label. The list of active ingredients that need to be reported in the pyrethroids class includes: metofluthrin, bifenthrin, cyfluthrin, beta-cyfluthrin, cypermethrin, deltamethrin, esfenvalerate, lambdacyhalothrin, and permethrin.

	in FY 15-16					
Diuron	Reporting not required in FY 15-16					
Diamides	Reporting not required in FY 15-16					
IPM Tactics and Strategies used: <ul style="list-style-type: none"> • Use of non-chemical strategies such as monitoring, mowing weeds, mulching. • Removal of plants that require frequent pesticide applications. • Replacing invasive plants with natives. • Preventive actions such as sealing holes and gaps in structures, improving sanitation. • Use of baits and traps instead of broadcast pesticides <p>When these strategies do not work, the City does apply organophosphates in the form of Glycophosphate from Roundup Pro Max in areas of vegetation where this is essential to weed/herbicide control.</p>						

C.9.b ► Train Municipal Employees	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	2
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	2
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within this reporting year.	100%
Type of Training: SMCWPPP Landscape IPM Training held on March 9, 2016. In house training by County Agr Commission trainer.	

C.9.c ► Require Contractors to Implement IPM

Did your municipality contract with any pesticide service provider in the reporting year?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If yes, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored Operator is contracted to implement IPM. New contract indicates no pesticides to be applied. Contractor has not reported applications in East Palo Alto and spot audits show that the pest control operator is not applying pesticides, but utilizing other controls.				

C.9.d ► Interface with County Agricultural Commissioners

Did your municipality communicate with the County Agricultural Commissioner to: (a) get input and assistance on urban pest management practices and use of pesticides or (b) inform them of water quality issues related to pesticides,	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
The City works with the County Ag commissioners to improve City pesticide use and ensure local pesticide operators are appropriately applying chemicals. The City has also been working to ensure access to the local properties that are difficult to obtain access. "See Section 9 of the SMCWPPP FY 15-16 Annual Report for summary of communication with the San Mateo County Agricultural Commissioner."				
Did your municipality report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary. The City noticed an applicator spraying exterior and interior buildings and did not see any notification. Pesticide applicator indicated they were not applying pesticides, only to leave the property owner with a bill indicating that pesticides were indeed applied. Complaint submitted to County Ag for investigation to ensure residents are made aware when pesticides are applied. The site in question was also the location of an integrated pest management pilot program, and this pest control operator may have sabotaged the IPM pilot through the application of chemicals that were not disclosed.				

C.9.e.ii (1) ► Public Outreach: Point of Purchase

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); OR reference a report of a regional effort for public outreach in which your agency participates.
Summary: See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 15-16 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

C.9.e.ii (2) ► Public Outreach: Pest Control Contracting Outreach

Provide a summary of outreach to residents who use or contract for structural pest control and landscape professionals); AND/OR reference a report of a regional effort for outreach to residents who hire pest control and landscape professionals in which your agency participates.

Permittee Name: [City of East Palo Alto](#)

Summary:

[See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 15-16 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use.](#)

C.9.e.ii.(3) ► Public Outreach: Pest Control Operators

Provide a summary of public outreach to pest control operators and landscapers and reduced pesticide use (here or in a separate report); **AND/OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary:

[See the C.9 Pesticides Toxicity Control section of SMCWPPP FY 15-16 Annual Report for a summary of outreach to pest control operators and landscapers to reduce pesticide use.](#)

C.9.f ► Track and Participate in Relevant Regulatory Processes

Summarize participation efforts, information submitted, and how regulatory actions were affected; **AND/OR** reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.

[During FY 15-16, we participated in regulatory processes related to pesticides through contributions to SMCWPPP, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.](#)

Section 10 - Provision C.10 Trash Load Reduction

C.10.a.i ► Trash Load Reduction Summary

For population-based Permittees, provide the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the reduction percentage on the information presented in C.10.b i-iv and C.10.e.i-ii. Provide a discussion of the calculation used to produce the reduction percentage, including whether the 60% trash reduction performance guideline was attained. If not attained, include a discussion of next steps (e.g., development of a detailed plan or report of non-compliance).

Trash Load Reductions

Percent Trash Reduction in All Trash Management Areas (TMAs) due to Trash Full Capture Systems (as reported C.10.b.i)	4.4%
Percent Trash Reduction in all TMAs due to Control Measures Other than Trash Full Capture Systems (as reported in C.10.b.ii) ⁶⁷	14.8%
Percent Trash Reduction due to Jurisdictional-wide Source Control Actions (as reported in C.10.b.iv) ¹	10.0%
SubTotal for Above Actions	29.2%

Trash Offsets (Optional)

Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	NA
Total (Jurisdictional-wide) % Trash Load Reduction in FY 15-16	29.2%

Discussion of Trash Load Reduction Calculation:

The City attained and reported a 55% trash load reduction in its FY 14-15 Annual Report, exceeding the trash load reduction target of 40% by 2014. The reissued MRP contains a revised calculation methodology that eliminates or caps past trash load reduction offsets or credits. Based on the new calculation methodology, as of July 1, 2016, the City has attained a 29% trash load reduction (including trash offsets). The reissued MRP also added a non-mandatory performance guideline of attaining 60% trash reduction by July 1, 2016. Based on the new calculation methodology and the information provided in this Annual Report, the City has not achieved the 60% performance guideline.

The City did not have sufficient time to adjust existing trash control implementation plan to achieve the new non-mandatory target, but expects to exceed the mandatory 70% trash load reduction requirement by June 30, 2017. The City has prepared a Trash Action Plan to document the description and schedule of additional trash load reduction control actions that will be implemented to attain and exceed the required 70% percent reduction by July 1, 2017.

⁶⁷ See Appendix 10-2 for changes between 2009 and FY 15-16 in trash generation by TMA as a result of Full Capture Systems and Other Measures.

Trash Action Plan--Load Reduction Schedule of Implementation for full compliance with MRP 2.0

During MRP 1.0, FY 14/15, the City of East Palo Alto reported calculations of 55% trash load reduction from the baseline, after implementing the adopted Long Term Trash Load Reduction Plan, fully compliant with the 50% reduction goal, based on the calculations approved for use during that time period.

Trash load reduction calculations for MRP 2.0 for FY 15/16 indicate that the City's trash load is improving at a substantially reduced pace than previously reported, with approximately 30-40% reduction below the baseline calculations. This updated calculation represents a net reduction in "trash load credits" potentially related to the following identified items:

- Changes in the calculations for trash load reduction over FY 14/15 due to changes between MRP 1.0 and MRP 2.0 assumptions.
- Reduced trash removal from the City's hot-spot along San Francisquito Creek due to reduced trash load at this location. The result of this infrastructure installation is substantially reduced trash loads here, possibly permanently eliminating this source of litter from being directly deposited into this natural waterway. Items such as beer bottles and spray paint cans have been virtually eliminated, along with other litter materials directly deposited via homeless persons, and vagrant activities.
- Increased density of residents living in the City, due to the critical housing shortage in the Peninsula and exorbitant housing prices, which is resulting in increased litter loads as indicated by the on land assessments conducted during this reporting period.
- Increased prevalence of illegal dumping throughout the City with increasingly poor Solid Waste Management practices by the community members possibly attributed to the increase in tenant relocations throughout the City.

- Reduced rainfall during the drought cycle, which has resulted in a higher prevalence of litter remaining on the roadways for the Street Sweeper to remove, along with a substantially reduced amount of litter reaching the waterways as the volume of litter material collected by the Street Sweeper has increased.
- On land volunteer cleanup variability due to ebbs and flows of intermittent volunteer dedication in the areas targeted for assessment. Monthly cleanup activities in rotating locations do not indicate long term results for litter reduction efforts.
- Inconsistency in the Street Sweeping schedule adherence due to contractor's staffing issues and mechanical issues with the equipment used for the street sweeping contract.
- A very large and growing population of homeless individuals, some of whom are depositing litter where they are resting during the day in nearby bus shelters and sidewalk areas throughout the City.

After reassessing trash load reduction goals over the last few months, the City has determined that the Long Term Trash Load Reduction Plan will not meet be sufficient for the City to meet updated requirements for trash load reduction set forth in MRP 2.0.

The City's prior focus on "soft" measures that rely on community behavior change are not substantial enough to address the immediate mandatory requirements that will reduce litter by 70% prior to July 1, 2017, or beyond. The City must now act urgently to eliminate litter permanently from entering the waterways to ensure the mandates are met by July 1, 2017. The City has determined that a portion of the small trash baskets inserted into the stormdrain inlets in FY 12/13 were placed in locations that are not ideal for addressing the highest trash loads, resulting in system-wide inefficiencies. The City will instead take a much more aggressive stance against litter through the implementation of full trash capture throughout the stormdrain system as a high priority action, immediately.

Issues surrounding the Street Sweeping program may have contributed to the overall effectiveness or ineffectiveness of the City's trash load reduction efforts. The City is in the process of updating the contract for street sweeping services and will finalize this contract during FY 16/17, with the updated street sweeping contract to become effective January 2017.

The updated contract will require much stronger proof of street sweeping effectiveness and continuous schedule adherence.

Timeline for Full Compliance

This is a conservative estimated timeline based on assumed needs. These actions may become more condensed if City Council authorization is not required for RFP and implementation. This will be dependent on the preliminary bids for each task.

October 2016

- Assess City's "Hot Spot" for litter. Maintenance team observed low levels of litter along San Francisquito Creek during the annual San Francisquito Creek Maintenance Walk with the Joint Powers Authorities, for a second year in a row. Coastal Cleanup Day at volunteer cleanup was shifted to an alternative location and the City Maintenance Department removed a very small quantity of litter on September 22, 2016 (less than one gallon of trash). The City will assess monthly to observe whether the "flood wall" installed in this location will provide ongoing deterrent for direct deposits of litter into San Francisquito Creek, for consideration of similar Direct Trash Discharge Controls throughout the waterway to further prepare for creek monitoring assessments.
- Assess 391 Demeter property fencing and encampments to determine whether required Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay. The City spent a substantial amount of effort during FY 15/16 to eliminate illegal dumping and encampment activities throughout this property, which has been contributing litter to San Francisco Bay for decades. The City will assess monthly whether the fencing and patrols required of the property owner have eliminated access to the site and act as a permanent remedy to this activity. This area is anticipated to generate substantially more than 30 cubic yards of wind and rain distributable debris, annually. The property's northern and eastern boundaries, roughly 0.66 miles, are in direct contact with wetlands and San Francisco Bay, which has resulted in direct deposit of this trash load on an ongoing basis. Furthermore, an adjacent neighborhood discharges stormdrain outfalls to this area, which has also been substantially contaminated with this debris. Removal of access to this property has significant potential to abate a quantifiable amount of litter working its way to the waterways from the City stormdrain system. The City will also be working with the property owner to obtain easements for maintenance of three of the City stormdrain outfalls, which are

located on this private property. This will enable the City to install full trash capture devices in the future, should these locations be noted as effective.

- Review Proposals for Street Sweeping contract, interview vendors who submitted proposals; identify a vendor who will be most effective at debris removal and recommend this vendor to the City Council;
- Update Long Term Trash Load Reduction Plan with primary emphasis on full trash capture throughout the City to meet trash load removal mandates and enhance street sweeping program, with supportive measures to include ongoing public behavior change as secondary measures.
- Prepare a Scope of Work for assessing the City stormdrain system for full trash capture that will meet MRP 2.0 mandatory trash load reduction targets.

November 2016

- Continue to assess City's "Hot Spot" for litter; determine whether "flood wall" is an ongoing deterrent for direct deposits of litter into San Francisquito Creek for consideration of potential Direct Trash Discharge Controls throughout the watershed.
- Continue to assess 391 Demeter property fencing and encampments to determine whether the Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay.
- Prepare staff report for **City Council** for approval of the recommended Street Sweeping contract; prepare contract according to City Council authorization;
- Provide the **City Council** with an updated Long Term Trash Load Reduction Plan for consideration of approval;
- Request the **City Council** authorize an RFP for selection of an engineering firm specializing in helping the City meet MRP 2.0 trash load reduction targets for 2017 and beyond, specifically via Full Trash Capture device installation, utilizing Measure M funds, Measure A funds, and any other appropriate funding, as needed for this study.
- Upon completion of the Full Trash Capture Assessment, obtain City Council authorization for accepting the recommendations for full trash capture device installation and enter into contract with recommended firms for the specific devices, up to the limit of currently available funds. If local funds are not available to enable the City to meet the 70% goals, work with the County of San Mateo regarding any potential funds that the County can repurpose to ensure this effort is completed.

December 2016

- Continue to assess City’s “Hot Spot” for litter; determine whether “flood wall” is an ongoing deterrent for direct deposits of litter into San Francisquito Creek for consideration of potential Direct Trash Discharge Controls throughout the watershed.
- Continue to assess 391 Demeter property fencing and encampments to determine whether the Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay.
- Finalize contract for Street Sweeping Services, open Purchase Order;
- Proceed with RFP selection process for Full Trash Capture assessment;
- Submit a request to the Executive Officer to obtain credit for Direct Trash Discharge Controls for the “flood wall” installed at the City’s current “trash hot spot,” and efforts at 391 Demeter to restrict pedestrian access that has contributed to substantial illegal dumping and homeless encampments.

January 2017

- Assess City’s “Hot Spot” for litter. Maintenance team removed small quantity of litter on September 22, 2016. Assess monthly to see whether the “flood wall” is an ongoing deterrent for direct depots of litter into San Francisquito Creek for consideration of potential Direct Trash Discharge Controls throughout the watershed.
- Assess 391 Demeter property fencing and encampments to determine whether the Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay.
- Begin new Street Sweeping Services contract;
- Obtain City Council Authorization for Full Trash Capture Assessment contractor;
- Begin contract to conduct Full Trash Capture Assessment.

January –March 2017

- Assess City’s “Hot Spot” for litter. Maintenance team removed small quantity of litter on September 22, 2016. Assess monthly to see whether the “flood wall” is an ongoing deterrent for direct deposits of litter into San Francisquito Creek for consideration of potential Direct Trash Discharge Controls throughout the watershed.
- Assess 391 Demeter property fencing and encampments to determine whether the Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay.
- Conduct Full Trash Capture Assessment;
- Provide recommendations to the City Council and request authorization to implement a minimum of 70% full trash capture devices throughout the City.

March-June 2017

- Assess City’s “Hot Spot” for litter. Maintenance team removed small quantity of litter on September 22, 2016. Assess monthly to see whether the “flood wall” is an ongoing deterrent for direct deposits of litter into San Francisquito Creek for consideration of potential Direct Trash Discharge Controls throughout the watershed.
- Assess 391 Demeter property fencing and encampments to determine whether the Code Enforcement actions are a consistent deterrent for direct deposits of litter into the San Francisco Bay.
- Install recommended full trash capture devices to provide a minimum 70% trash load reduction;
- If appropriate, remove any duplicative full trash capture devices upstream but within the same treatment area as the new full trash capture devices;
- Update trash load maps for inclusion in the Annual Report for FY 16/17.

FY 2017/2018 through FY 2018/2019

- Include full trash capture devices to meet 80% requirements of trash load reduction requirements

C.10.a.iii ► Mandatory Trash Full Capture Systems

Provide the following:

- 1) Total number and types of full capture systems (publicly and privately-owned) installed prior to FY 15-16, during FY 15-16, and to-date, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3.
- 2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for non-population based Permittees compared to the total required by the permit.

Type of System	# of Systems	Areas Treated (Acres)*
Installed Prior to FY 15-16		
Connector Pipe Screen	38	55.6
Installed in FY 15-16		
NA	NA	NA
Total for all Systems Installed To-date	38	55.6
Treatment Acreage Required by Permit (Population-based Permittees)		18
Total # of Systems Required by Permit (Non-population-based Permittees)		NA

*Area treated includes jurisdictional and non-jurisdictional lands (e.g., public K-12 schools and colleges, and freeways)

C.10.b.i ► Trash Reduction - Full Capture Systems

Provide the following:

- 1) Jurisdictional-wide trash reduction in FY 15-16 attributable to trash full capture systems implemented in each TMA;
- 2) The total number of full capture systems installed to-date in your jurisdiction;
- 3) Since the effective date of MRP 2.0 (January 1, 2016), the percentage of systems that exhibited significant plugged/blinded screens or were >50% full when inspected or maintained;
- 4) A narrative summary of any maintenance issues and the corrective actions taken to avoid future full capture system performance issues; and
- 5) A certification that each full capture system is operated and maintained to meet the full capture system requirements in the permit.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or >50% full	Summary of Maintenance Issues and Corrective Actions
1	4.4%	38	2.5% 1/39 devices were >50% full (75% full)	<p>The City is having challenges tracking this information through the Maintenance work order "iWorks" database system. The Maintenance Manager intends to work with the SMCWPPP Maintenance Subcommittee to ensure future reports are easily obtained for reference in future reporting cycles. Maintenance of the devices is a priority for the City and occurs at a minimum of twice annually.</p> <p>One device requires frequent fall maintenance as it is positioned over a deciduous tree that drops a large amount of leaf litter in the fall.</p>
2	0%			
3	0%			
4	0%			
5	0%			
6	0%			
7	0%			
8	0%			
Total	4.4%			

Certification Statement:

C.10.b.ii ► Trash Reduction – Other Trash Management Actions (PART A)	
Provide a summary of trash control actions other than full capture systems or jurisdictional source controls that were implemented within each TMA, including the types of actions, levels and areal extent of implementation, and whether actions are new, including initiation date.	
TMA	Summary of Trash Control Actions Other than Full Capture Systems
1A	<p>Installed a pedestrian banister/fence/flood wall along the City's trash hot spot area, restricting access to the bed of the creek as most activities were illicit, including graffiti and bringing abandoned furniture into the waterway to rest and leave single use beverage and food containers. The resultant litter from the trash assessment for this hot spot reduced the litter from this location to under 20 items of illegal dumping and litter, down substantially from hundreds of gallons in previous years. It is assumed that this substantial trash load reduction will be permanent as long as the banister/fence/floodwall continues to be maintained. The life expectancy on this is over ten years.</p> <p>Interestingly, now that the nuisance activity is suppressed, there is no evidence surrounding the outfalls that litter is entering the waterway from the stormdrain system in this specific area.</p>
1B, 1C, 1D, 2, 5	<p>On land cleanup activities from a volunteer base: Clean Zones. This activity is associated with a Police Department associated community engagement program that incorporates both the Partnership in Pride Campaign and the Fit Zone program to activate the community, while encouraging community members to take pride in keeping the City Clean. Clean Zones has continued the engagement of Alleluia Church (which has conducted ongoing cleanups monthly during FY 14/15), and expanded this engagement to include St Francis of Assisi Church and Tongan First Assembly of God into ongoing community cleanup activities on a monthly basis. Community volunteers are provided with a nominal stipend for miles cleaned.</p> <p>While this project was grant sponsored, the City once considered expanding it to meet MRP 2.0 goals. Upon receiving the assessment for the area cleaned, it appears that this cleanup activity is insufficient to meet MRP 2.0 trash load reduction goals as there appears to be significant variation in the actual load reduction provided by this activity. It is assumed that a much higher frequency of cleanup would be necessary to meet the full trash capture equivalent, which is beyond the capacity of the volunteer program.</p>
1A, C, D 5AB	Installed Street Sweeping Parking Enforcement Signs throughout service area. No prior signage. Minimum monthly service.
Citywide	Assessment of overall Citywide Street Sweeping program which has in the past been expanded as-needed, without documentation of updated maps and schedules. Identified all street sweeping parking enforcement signage and prepared an updated list. Detailed updated Capital Improvement Project for updating street sweeping signage throughout City. Prepared RFP for updated contract for Street Sweeping service.
6A, 6B	On land cleanup by private property owners. Daily.

Summary of Trash Control Measures Other than Full Capture Devices:

- **Street Sweeping:** Since July 1, 2009, the City has installed street sweeping signage in many neighborhoods throughout the City, beginning with major thoroughfares and arterials, in 2009, then as follows by trash management area:
 - **2011/12:** 6A& 6B (partial)
 - **2012/13:** 1B
 - **2013/14:** 3, 1B, 5A
 - **2014/15:** 1C (initiated)
 - **2015/16:** 1C (completed), 5A& B, 1D
- The City intends to continue installation of parking enforcement street sweeping signage to ensure all streets are signed as follows:
 - 2016/17: 2
 - 2017/18: 6A&B (complete)
 - 2018/19: ensure all street sweeping parking restriction signs are installed throughout the City streets.
- **On-land Cleanup:** Beginning in August 2012, the City began the "Partnership in Pride campaign" in an effort to engage community members to take more pride in the blight throughout the City, with a focus on litter and graffiti. Beginning with a high school football team building exercise, the Campaign provided an opportunity for many students to earn their
- **Partial Capture Devices:** The City of East Palo Alto installed a fence/banister/flood control wall along the San Francisquito Creek which has provided a substantial reduction in directly deposited litter and trash, which has subsequently preventing hundreds of gallons of trash from entering the waterways by restricting direct access into the San Francisquito Creek. While this was not the primary function of this flood control wall, it has reduced the trash load at the City's trash hot spot tremendously and has also provided enhanced understanding of the amount of litter entering the San Francisquito Creek via stormdrain outfalls from City Streets.
- **Storm Drain Inlet Cleaning:** When the City incorporated, the stormdrain system was poorly maintained. Since the MRP 1.0, the City has been maintaining all stormdrain inlets with the Maintenance Staff under the Public Works Division. Materials are removed with a vac truck twice a year to ensure the inlets are not prone to flooding.

In FY 13/14, the City had a stormdrain assessment conducted to determine the functionality of the stormdrain system as well as the areas throughout the stormdrain system that require enhanced debris removal due to areas of damaged infrastructure. The Stormdrain Master Plan was prepared and is being implemented to ensure incremental improvement throughout the stormdrain system.

During FY 15/16, the City has moved forward with the acquisition of a new vac truck as the prior device was becoming a maintenance burden. During FY 16/17 the City will have a new machine that will enable the City to more accurately track the stormdrain inlets that have been maintained through electronic reporting equipment.

During FY 15/16, the City has conducted a full assessment of the O'Connor Pump Station to not only remove trash that accumulates in the 2' trash racks, but to also remove the accumulated sediment that has accumulated since—at a minimum—the City's incorporation in 1983. The vault/holding bay had areas of over five feet of accumulated sediment deposited inside. All of this material was removed to ensure full capacity of the pump station.

During FY 16/17, the City will attempt to sample some of the excavated sediment to test for pollutants of concern to determine whether there is any loading of PCBs, mercury, copper, or legacy pesticides, which may have been distributed from prior industrial activities.

- **Uncovered Loads:** During MRP 1.0, the City attempted a variety of efforts to reduce uncovered loads. Due to the large number of self-hauling businesses, local efforts have been constrained by varying staffing levels and the prioritization. In FY 14/15 and 15/16, the City began hiring community service aids to provide parking enforcement. This has led to the
- **Anti-littering and illegal dumping enforcement activities:** During the term of MRP 1.0, the City has worked on a number of fronts to address illegal dumping and littering.

Illegal dumping is tracked by complaint via a single contact point—the Maintenance Division's receptionist—who takes each call and tracks it via spreadsheet, sends a copy to the City's franchise hauler, Recology, who picks up the materials within 24 hours. The City Council has received annual updates regarding the cost of this service to the community, close to \$100,000. The City has attempted to hold those accountable when the illegal dumping has personal identification, however, unless there are photos or videos that indicate the person who actually deposited the materials, no prosecution is possible. To date, the City has not had any successful prosecutions of illegal dumping.

The problem is on the rise. In 2014/15, there were over 700 cases of reported illegal dumping. During FY 15/16, there were over 1,000 reports of illegal dumping. This information is tracked through Recology, who provides reports to the City as part of the Franchise Agreement.

Anti-littering has also been a focus for the community during the MRP 1.0 permit term. Primary activities have focused on providing clean-up events, encouraging volunteer engagement, and providing classroom education on the issue of illegal dumping and littering at the 3rd and 5th grades and high school level. While these activities have educated students, which are evident via survey of young people walking on local streets, the incidence of littering has not been suppressed enough by this activity to see the substantial litter reductions necessary to meet current litter reduction future targets, as indicated during recent annual assessments. While this type of activity is necessary to ensure the community is aware that litter is a public and environmental threat, and for aesthetic improvement of the local streets, it is unlikely alone to reduce littering and illegal dumping to the extent necessary to prevent the volumes of trash we are seeing on the public streets.

- **Improved Trash Bin/Container Management:** During the permit term for MRP 1.0, the City has continuously revised our solid waste service, working in conjunction with Rethink waste and Recology, our franchise hauler. Working in coordination with the commercial and residential sectors, the City assisted in targeted audits of solid waste services and provided inspections for stormwater compliance which would reveal if the amount of trash service is appropriate and adequate. In cases when bin capacity is less than necessary, upsized service is required.

**C.10.b.ii ► Trash Reduction – Other Trash Management Actions
 (PART B)**

Provide the following:

- 1) A summary of the on-land visual assessments in each TMA (or control measure area), including the street miles available for assessment (i.e., those associated with VH, H, or M trash generation areas not treated by full capture systems), the street miles assessed, the % of available street miles assessed, and the average number of assessments conducted per site within the TMA; and
- 2) Percent jurisdictional-wide trash reduction in FY 15-16 attributable to trash management actions other than full capture systems implemented in each TMA.

TMA ID or (as applicable) Control Measure Area	Total Street Miles Available for Assessment	Summary of On-land Visual Assessments			Jurisdictional-wide Reduction (%)
		Street Miles Assessed	% of Applicable Street Miles Assessed	Average # of Assessments Conducted at Each Site*	
1	13.08	2.81	21.5%	5.7	14.8%
2	7.92	0	0%	0	0%
3	0.78	0	0%	0	0%
4	0.94	0	0%	0	0%
5	4.36	0	0%	0	0%
6	3.13	0	0%	0	0%
7	0.79	0	0%	0	0%
8	0	NA**	NA**	NA**	NA**
Total		2.81	-	-	14.8%

*Each on-land visual assessment site is approximately 1,000 feet (on average) in length. Average number of assessments represent those conducted in FYs 14-15 and 15-16.

**All areas in TMA are low trash generation.

C.10.b.iv ► Trash Reduction – Source Controls

Provide a description of each jurisdictional-wide trash source control action implemented to-date. For each control action, identify the trash reduction evaluation method(s) used to demonstrate on-going reductions, summarize the results of the evaluation(s), and provide the associated reduction of trash within your jurisdictional area. Also include the total % reduction credit for all source controls up to the maximum 10% allowed by MRP 2.0.

C.10.b.iv ► Trash Reduction – Source Controls

Provide a description of each jurisdictional-wide trash source control action implemented to-date. For each control action, identify the trash reduction evaluation method(s) used to demonstrate on-going reductions, summarize the results of the evaluation(s), and provide the associated reduction of trash within your jurisdictional area. Also include the total % reduction credit for all source controls up to the maximum 10% allowed by MRP 2.0.

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction	Total Reduction Credit (%)
Single Use Bag Ordinance	The City Council adopted the San Mateo County Reusable Bag Ordinance on April 19, 2012 for implementation October 1, 2012. This prohibits the distribution of single-use plastic bags and requires a \$0.10 fee be assessed for paper or heavy plastic bags.	<p>Inspections and hot spot assessments are conducted to assess the effectiveness of the control measure in reducing trash from entering the municipal stormwater conveyance system. The City developed its % trash reduced estimate using the following assumptions:</p> <p>1.) Single use plastic bags comprise 8% of the trash discharged from stormwater conveyances, based on the Regional Trash Generation Study conducted by BASMAA;</p> <p>2) 95% of single use plastic bags distributed in the City/County are affected by the implementation of the ordinance, based on the County of San Mateo's Environmental Impact Report; and</p> <p>Of the bags affected by the ordinance, there are now 90% less bags being distributed, based on customer complaints received by the County of San Mateo's Department of Environmental Health Services. This is conservative estimate given that in FY 13-14 Environmental Services only received complaints about 4, of the over 1900 businesses in San Mateo County that are affected by the single-use plastic bag ordinances, and the fact that staff inspections have indicated no violations of this ordinance.</p>	Results of assessments conducted by the County of San Mateo on behalf of all municipalities in San Mateo County indicate that the City's ordinance is effective in reducing the number of single use plastic bags in stormwater discharges. This preliminary conclusion is based on the very small number of complaints received from customers about businesses in San Mateo County that are continuing to use single use plastic bags after ordinances were adopted.	7%	7%
Expanded Polystyrene Food Service Ware Ordinance				0%	

- **Reusable Bag Ordinance (Free plastic bag ban):** In April, 2013, the City Council passed the San Mateo County Reusable Bag Ordinance, restricting retailers from providing free plastic bag and allowing only heavier, reusable plastic, or paper bags to be provided to customers at a minimum charge of \$0.10 per bag beginning October 2013. The charge for such allowed bags went up to \$0.25 per bag beginning January 2015. The result of this bag “ban” has been a significant reduction in bags throughout the City stormdrain system, streets, and local waterways.
- **Other Source Control Actions:** Once the City secures the stormdrain system with full trash capture devices throughout, the City will consider other product bans to reduce the amount of maintenance required of the full trash capture devices. Business compliance rates have been very high—upwards of 100%. There are audits conducted by the San Mateo County Environmental Health inspections, as well as random inspections by City staff. To date, this effectively removed up to 90% of the single use plastic bags that formerly found their way into the City's waterways. The most likely bans that will be considered will be the polystyrene ban, the restaurant bag bans, and some means of providing further incentives for recycling/redeeming single use beverage containers with a CA redemption value as these are high value items that would seem to be easily recovered and recycled.

C.10.c ► Trash Hot Spot Cleanups

Provide the FY 15-16 cleanup date and volume of trash removed during each MRP-required Trash Hot Spot cleanup during each fiscal year listed. Indicate whether the site was a new site in FY 15-16.

Trash Hot Spot	New Site in FY 15-16 (Y/N)	FY 15-16 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2011-12	FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16
EPA01	N	September 7, 2015	3.5	1.6	3.6	2.4	0.5
EPA01	N	May 16, 2016	3.5	1.6	3.6	2.4	0.1

C.10.d ► Long-Term Trash Load Reduction Plan

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your trash generation map was revised and is attached to your Annual Report.

Description of Significant Revision

**Associated
TMA**

In FY 15-16, consistent with all MRP Permittees, all public K-12 schools, college and university parcels were made non-jurisdictional on the City's baseline trash generation maps. Under California Government Code Sections 4450 through 4461, the construction, modification, or alternation of facilities and/or structures on these parcels are under the jurisdiction of the California Division of State Architect and not the City. The public right-of-way (e.g., streets and sidewalks) surrounding these parcels remain as jurisdictional on the City's baseline trash generation maps. The City's revised baseline trash generation map is included as Appendix 10-2.

All applicable

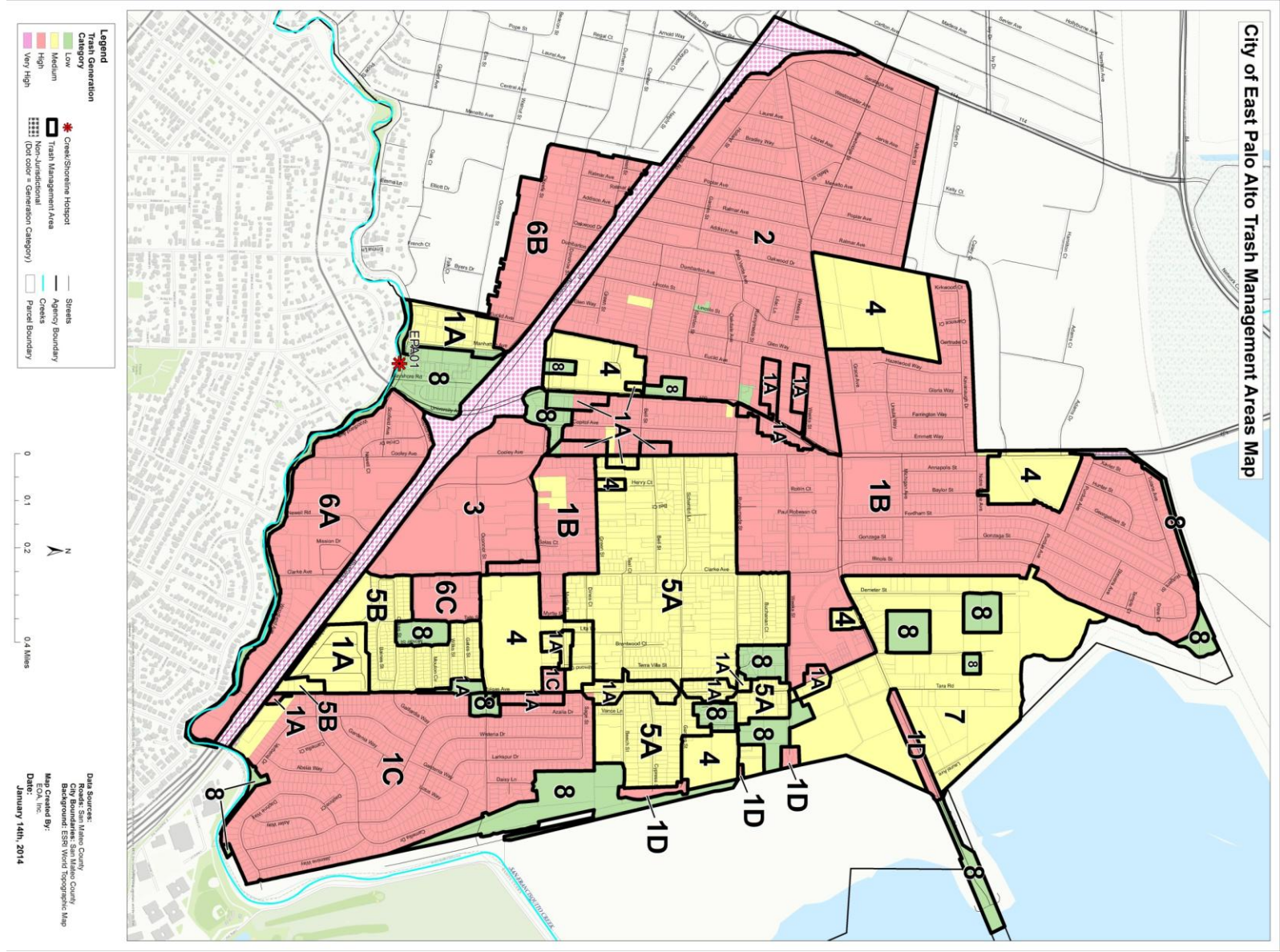
C.10.e. ► Trash Reduction Offsets (Optional)			
Provide a summary description of each offset program implemented, the volume of trash removed, and the offset claimed in FY 15-16. Also, for additional creek and shoreline cleanups, describe the number and frequency of cleanups conducted, and the locations and cleanup dates. For direct discharge control programs approved by the Water Board Executive Officer, also describe the results of the assessments conducted in receiving waters to demonstrate the effectiveness of the control program. Include an Appendix that provides the calculations and data used to determine the trash reduction offset.			
Offset Program	Summary Description of Actions and Assessment Results	Volume of Trash (CY) Removed/Controlled in FY 15-16	Offset (Jurisdiction-wide Reduction %)
Additional Creek and Shoreline Cleanups (Max 10% Offset)	Coastal Cleanup Day—entire San Francisco bayside shoreline along the City's boundary September 19, 2015 From Ravenswood Open Space District to Cooley Landing to O'Connor Pump Station to highway 101 120 volunteers, ~3.1 miles of shoreline cleaned	15 Cubic Yards	5%
Direct Trash Discharge Controls (Max 15% Offset)	The City has reduced the incidence of trash being directly deposited into San Francisquito Creek at the City's trash hot spot, through the installation of what was intended to be a flood control measure: a fence/floodwall where flooding from a December 23, 2012 flood incident resulted in localized roadway flooding. The City installed the "flood wall" and immediately thereafter the incidence of trash accumulating in this area abated to a significant degree, going from multiple cubic yards of litter removed in this area to less than one cubic yard during the first cleanup event of the year and nearly no material during the second cleanup of the year. The City is likely to utilize this as a pilot for consideration of providing similar structures along the creek where heavy illegal dumping and direct discharges are occurring due to pedestrian access. This type of device has the propensity to allow the City to better gauge the amount of litter reaching the San Francisquito creek via the City stormdrain system outfalls, as once the directly deposited materials no longer occur, the City will be better suited to monitoring these outfall locations. This is likely to be recommended in FY 17/18 Capital Improvements Program or once the City has installed full trash capture devices to reach 100% trash load reduction requirements.	2.0-3.0	0%

Appendix XX. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 15-16.

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 15-16 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 15-16 After Accounting for Full Capture Systems <u>and</u> Other Control Measures					Jurisdiction-wide Reduction via Other Control Measures (%)	Jurisdiction-wide Reduction via Full Capture <u>AND</u> Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1	3	20	456	0	480	55	7	418	0	480	4.4%	74	210	181	15	480	14.8%	19.2%
2	1	1	226	0	228	1	1	226	0	228	0%	1	1	226	0	228	0%	0%
3	0	0	50	0	50	0	0	50	0	50	0%	0	0	50	0	50	0%	0%
4	0	36	0	0	36	0	36	0	0	36	0%	0	36	0	0	36	0%	0%
5	0	135	28	0	162	0	135	28	0	162	0%	0	135	28	0	162	0%	0%
6	0	0	116	0	116	0	0	116	0	116	0%	0	0	116	0	116	0%	0%
7	0	102	0	0	102	0	102	0	0	102	0%	0	102	0	0	102	0%	0%
8	92	0	0	0	92	92	0	0	0	92	0%	92	0	0	0	92	0%	0%
Totals	97	294	877	0	1,268	149	281	838	0	1,268	4.4%	167	484	602	15	1,268	14.8%	19.2%

Appendix 10-2

Revised Baseline Trash Generation Map and Areas Currently Addressed by Full Capture Systems



Section 11 - Provision C.11 Mercury Controls

- C.11.a ► Implement Control Measures to Achieve Mercury Load Reductions
- C.11.b ► Assess Mercury Load Reductions from Stormwater
- C.11.c ► Plan and Implement Green Infrastructure to Reduce Mercury Loads
- C.11.d ► Prepare Implementation Plan and Schedule to Achieve TMDL Allocations
- C.11.e ► Implement a Risk Reduction Program

Summary:

[A summary of accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of SMCWPPP's FY 15-16 Annual Report.](#)

Section 12 - Provision C.12 PCBs Controls

C.12.a ► Implement Control Measures to Achieve PCBs Load Reductions

C.12.b ► Assess PCBs Load Reductions from Stormwater

C.12.c ► Plan and Implement Green Infrastructure to Reduce PCBs Loads

C.12.d ► Prepare Implementation Plan and Schedule to Achieve TMDL Allocations

C.12.e ► Evaluate PCBs Presence in Caulks/Sealants Used in Storm Drain or Roadway Infrastructure in Public Rights-of-Way

C.12.f ► Manage PCB-Containing Materials and Wastes During Building Demolition Activities So That PCBs Do Not Enter Municipal Storm Drains

C.12.g. ► Fate and Transport Study of PCBs: Urban Runoff Impact on San Francisco Bay Margins

C.12.h ► Implement a Risk Reduction Program

Summary:

A summary of accomplishments for these sub-provisions are included within the C.12 PCBs Controls section of SMCWPPP's FY 15-16 Annual Report. The City has worked with the BASMAA program and SMCWPPP to assess the City's old industrial areas and sediment load areas where stormwater has deposited sediment to determine the potential for PCB reduction.

Section 13 - Provision C.13 Copper Controls

C.13.a.iii ► Manage Waste Generated from Cleaning and Treating of Copper Architectural Features

(For FY 15-16 Annual Report only) Do you have adequate legal authority to prohibit the discharge of wastewater to storm drains generated from the installation, cleaning, treating, and washing of copper architectural features, including copper roofs?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
(For FY 15-16 Annual Report only) Provide a summary of how copper architectural features are addressed through the issuance of building permits.				
Summary: The City 1) attaches the SMCWPPP “Requirements for Architectural Copper” Fact Sheet (www.flowstobay.org/files/newdevelopment/flyersfactsheets/ArchitecturalcopperBMPs.pdf) to building permit applications for roof replacement or new buildings; 2) reviews building permit applications specifically for the use of copper architectural features, and provides guidance on the installation and maintenance of these features; and 3) has a broad-reaching stormwater ordinance that prohibits such materials from reaching the stormdrain system.				
(FY 15-16 Annual Report and each Annual Report thereafter) Provide summaries of permitting and enforcement activities to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction.				
Summary: During construction, municipal construction stormwater inspectors are responsible for identifying copper architectural features and if appropriate BMPs are implemented. Any issues noted will be documented and enforcement actions recorded in the Provision C.6 inspection records. Post-construction municipal illicit discharge inspectors are responsible for responding to, investigating and identifying illegal discharge of wash water from washing copper architectural features. Any enforcement actions or reported discharges are recorded in the Provision C.5 inspection records. The SMCWPPP “Requirements for Architectural Copper” Fact Sheet is made available to the public, construction inspectors and illicit discharge inspectors on the SMCWPPP website (www.flowstobay.org/files/newdevelopment/flyersfactsheets/ArchitecturalcopperBMPs.pdf). Inspectors are made aware of the concerns with copper architectural features at SMCWPPP Training Workshops and internal municipal trainings. There have been no incidents of architechural copper installations noted during FY 15/16.				

C.13.b.iii ► Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals

(For FY 15-16 Annual Report only) Do you have adequate legal authority to prohibit the discharge to storm drains of water containing copper-based chemicals from pools, spas, and fountains?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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Permittee Name: **City of East Palo Alto**

(For FY 15-16 Annual Report only) Provide a summary of how copper-containing discharges from pools, spas, and fountains are addressed to accomplish the prohibition of the discharge.

Summary:

The City of East Palo Alto: 1) uses the OWOW “Maintenance Tips for Pools, Spas, and Fountains” Fact Sheet, available on the SMCWPPP website (<http://www.ourwaterourworld.org/Portals/0/documents/pdf/Maintenance%20Tips%20for%20Pools%20%20Spas%20and%20Fountains.pdf>) to educate the public; 2) responds to discharges from pools through your illicit discharge detection and elimination program; and 3) requires all regulated projects to discharge pools, spas, and fountain water to the sanitary sewer. During the last several years the City has only encountered one discharge of swimming pool water to the stormdrain system, and this incident was prosecuted.

(FY 15-16 Annual Report and each Annual Report thereafter) Provide summaries of any enforcement activities related to copper-containing discharges from pools, spas, and fountains.

Summary:

Upon review of our Provision C.5 illicit discharge inspection data we found no enforcement activities related to copper-containing discharges from pools, spas, and fountains in this fiscal year.

C.13.c.iii ► Industrial Sources Copper Reduction Results

Based upon inspection activities conducted under Provision C.4, highlight copper reduction results achieved among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed.

Summary:

The City of East Palo Alto continues to inspect metal fabricators to ensure that if copper is used, there is no potential for stormwater interaction.

Section 15 -Provision C.15 Exempted and Conditionally Exempted Discharges

C.15.b.vi.(2) ► Irrigation Water, Landscape Irrigation, and Lawn or Garden Watering

Provide implementation summaries of the required BMPs to promote measures that minimize runoff and pollutant loading from excess irrigation. Generally the categories are:

- Promote conservation programs
- Promote outreach for less toxic pest control and landscape management
- Promote use of drought tolerant and native vegetation
- Promote outreach messages to encourage appropriate watering/irrigation practices
- Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.

Summary:

[The City of East Palo Alto has one of the top 5 lowest water use rates per-capita in California.](#)

[During FY 15/16, the City's water rate increase of over 40% has resulted in a substantial conservation effort by the community. While the City has targeted a 10 percent voluntary reduction in water use, and promoted conservation along with drought tolerant and native vegetation, there has been a 20% reduction in water usage by the community. It is most likely that this conservation effort the reflection of a very price sensitive community.](#)

[Furthermore, the City currently has a moratorium on new water connections due to the severity of the drought coupled with the lack of sustainable water sources.](#)

[See Section C.9.e.ii of SMCWPPP's FY 15-16 Annual Report for a description of SMCWPPP's activities related to point-of-purchase outreach which promotes less toxic pest control and landscape management. See Section C.7 of SMCWPPP's FY 15-16 Annual Report for a description of outreach conducted to promote water conservation programs, such as promoting rain barrel use. Information on water conservation, less-toxic pest control and appropriate watering/irrigation practices is also posted on SMCWPPP's website \(\[www.flowstobay.org\]\(http://www.flowstobay.org\)\).](#)