Town of Atherton

Town Administrative Offices
150 Watkins Avenue
Atherton, California 94027
Phone: (650) 752-0586
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September 30, 2019

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

Subject: **Town of Atherton**
FY 2018/19 Annual Report

Dear Mr. Montgomery:

This letter and Annual Report with attachments is submitted by the Town of Atherton pursuant to Permit Provision C.17.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, 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 2018/19 and related accomplishments.

Please contact Robert Ovadia at 650-752-0541 regarding any questions or concerns.

Very truly yours,

George Rodericks
City Manager

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Town of Atherton
FY 2018/19 ANNUAL REPORT

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."

Signature of Duly Authorized Representative:

George Rodericks, City Manager — 9/26/19 Date

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Section 1 – Permittee Information

Background Information					
Permittee Name:	Town of Atherton				
Population:	7,147 (as of July 2014 Census Bureau)				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2015-0049				
Reporting Time Period (month/year):	July 2018 through June 2019				
Name of the Responsible Authority:	George Rodericks			**Title:**	Town Manager
Mailing Address:	150 Watkins Avenue				
City:	Atherton	**Zip Code:**	94027	**County:**	San Mateo
Telephone Number:	650-752-0541	**Fax Number:**			
E-mail Address:	grodericks@ci.atherton.ca.us				
Name of the Designated Stormwater Management Program Contact (if different from above):	Robert Ovadia			**Title:**	Director of Public Works
Department:	Public Works				
Mailing Address:	150 Watkins Avenue				
City:	Atherton	**Zip Code:**	94027	**County:**	San Mateo
Telephone Number:	650-752-0541	**Fax Number:**			
E-mail Address:	rovadia@ci.atheron.ca.us				

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation
Highlight/summarize activities for reporting year:

Summary:
Refer to the C.2 Municipal Operations section of SMCWPPP's FY 2018/19 Annual Report 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: All work is contracted out to a company that performs municipal maintenance service work. Pertinent BMPs for specific work activities are reinforced at their regular tailgate safety meetings per our contract. Street superintendent oversees these BMPs and ensures they are in effect during pertinent work.

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.

NA	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
NA	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments:

No Mobile Cleaning Service was used by the Town in FY 18/19. The Town of Atherton followed the State level restriction on power washing due to the drought.

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
Y	Control of discharges from graffiti removal activities
Y	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
NA	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
NA	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
NA	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.

Comments:

All graffiti was removed by painting over it, with no residue or remedied with appropriate graffiti cleaning techniques. No surface cleaning was performed. Belbrook Channel was maintained and completed prior to rainy season under permit from the Regional Water Quality Control Board.

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

Does your municipality own/maintain rural[1] roads:	X	**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.

Y	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
Y	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
Y	No impact to creek functions including migratory fish passage during construction of roads and culverts
Y	Inspection of rural roads for structural integrity and prevention of impact on water quality
NA	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
NA	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
NA	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:
Atherton does not have any unpaved rural roads. While Atherton would use these methods when necessary, none were necessary in the 18/19 FY.

[1]Rural 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):

NA	We do not have a corporation yard
NA	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit
X	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:

X	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment
X	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system
NA	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method
X	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
X	Cover and/or berm outdoor storage areas containing waste pollutants

Comments:
There is no vehicle or equipment washing on site.

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	**Corp Yard Activities w/ site-specific SWPPP BMPs**	**Inspection Date**[2]	**Inspection Findings/Results**	**Date and Description of Follow-up and/or Corrective Actions**
99 Station Lane	General good housekeeping BMPs being implemented. All equipment and equipment parking occurs indoors. All	9/28/2018	No findings to report – all applicable BMPs being implemented.	n/a

[2] Minimum inspection frequency is once a year during September.

	maintenance occurs off-site. All vehicle fueling is offsite.			
150 Watkins Ave	General good housekeeping BMPs being implemented. All equipment and equipment parking occurs indoors, with the exception of wood chips and soil which are stored in covered piles. All maintenance and fuel dispensing occurs off-site.	9/28/2018	No findings to report – all applicable BMPs being implemented.	n/a

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

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.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.?	x	**Yes**		**No**
Comments (optional):				

C.3.e.v ► Special Projects Reporting

1. In FY 2018-19, 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 2018-19, 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.
The Town of Atherton does not have any newly installed stormwater treatment systems or HM controls.

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

Site Inspections Data	**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 (FY 17-18)	**4**
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 18-19)	**4**
Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 18-19)	**1**
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 18-19)	25%[1]

[1] Based on the number of Regulated Projects in the database or tabular format at the end of the previous fiscal year, per MRP Provision C.3.h.ii.(6)(b).

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:

One inspection was conducted this year, but no changes have been made to the O&M program as the stormwater treatment program is working as designed.

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 overall Program inspection is proving effective and working as designed – no issues to date.

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 require implementation of at least one of the site design measures listed in Provision C.3.i. We are using the following Program and BASMAA products for C.3.i implementation:**
- **BASMAA's site design fact sheets**
- **The SMCWPPP Stormwater Checklist for Small Projects (www.flowstobay.org/newdevelopment#forms)**
- **C.3.i guidance provided by the countywide program (e.g. the Model Stormwater Conditions of Approval).**

C.3.j.i.(5).(b) ► Green Infrastructure Plan

(For FY 2018-19 Annual Report only) Did your agency complete a Green Infrastructure Plan?	x	**Yes, see attached Green Infrastructure Plan**		**No**

If No, provide schedule for completion:

GI Plan was approved by the City Council on September 18, 2019. The GI plan is available through the following link:
https://www.ci.atherton.ca.us/DocumentCenter/View/6813/Green-Infrasturcture-Plan

C.3.j.i.(5).(c) ► Legal Mechanisms

(For FY 2018-19 Annual Report only) Does your agency have legal mechanisms in place to ensure implementation of the Green Infrastructure Plan?	x	**Yes, see attached documents or links provided below**		**No**

If Yes, describe the legal mechanisms in place and the documents attached or links provided.

As part of the GI Plan development process, the Town of Atherton has reviewed its existing policies, ordinances, and/or other legal mechanisms related to the implementation of stormwater NPDES permit requirements and found that it has sufficient legal authority to implement the GI Plan. Adoption (or acceptance) of the GI Plan by the Town of Atherton has further strengthened this authority. Descriptions of and links to documents demonstrating legal authority are provided below (provide link).
Municode: https://www.codepublishing.com/CA/Atherton/
G & D Requirements: http://www.ci.atherton.ca.us/DocumentCenter/View/281/DrainageCriteria_000?bidId=
HTO: http://www.ci.atherton.ca.us/DocumentCenter/View/3377/Tree_Preservation_Guidelines?bidId=
GI Plan Completed September 18, 2019: https://www.ci.atherton.ca.us/DocumentCenter/View/6813/Green-Infrasturcture-Plan

If No, provide schedule for completion:
GI Plan was approved by the City Council on September 18, 2019. The GI plan is available through the following link:
https://www.ci.atherton.ca.us/DocumentCenter/View/6813/Green-Infrasturcture-Plan

C.3.j.i.(5)(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:

Interdepartmental Staff discussions on creating and implementing required GI workplan occurred in early winter 18/19.

GI Work plan Adoption at City Council Meeting January 17,2018
https://www.ci.atherton.ca.us/DocumentCenter/View/4778/Item-12?bidId=

GI Plan Contract Approval Meeting, January 16, 2019
https://www.ci.atherton.ca.us/DocumentCenter/View/6119/Item-12

GI Plan Study Session June 5, 2019
https://www.ci.atherton.ca.us/DocumentCenter/View/6473/ITEM-2

Builders Roundtable August 5, 2019

GI Plan Adopted September 18, 2019
https://www.ci.atherton.ca.us/DocumentCenter/View/6777/ITEM-18

GI Plan was approved by the City Council on September 18, 2019. The GI plan is available through the following link:
https://www.ci.atherton.ca.us/DocumentCenter/View/6813/Green-Infrasturcture-Plan

Please refer to SMCWPPP FY 2018/19 Annual Report for a summary of outreach efforts implemented at the countywide level.

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:

The Town received a grant from Caltrans for green stormwater diversion and cleaning within the Atherton Channel drainage area. This was the first grant of its kind in Northern California which is intended to detain and clean first flush storm water. The project is proposed at Cartan Field.

Summary of Planning or Implementation Status of Identified Projects:
The preliminary design is complete and the environmental review, administrative process is underway. The IS/MND draft has been received with circulation planned for fall 2019.

C.3.j.iii.(2) and (3) ► 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.

(For FY 2018-19 Annual Report only) Submit a plan and schedule for new and ongoing efforts to participate in processes to promote green infrastructure.

Please refer to SMCWPPP FY 2018/19 Annual Report for: 1) 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; and 2) a plan and schedule for new and ongoing efforts to participate in processes to promote green infrastructure.

Summary of Planning or Implementation Status of Identified Projects:
The Town received a grant from Caltrans for green stormwater diversion and cleaning within the Atherton Channel drainage area. This was the first grant of its kind in Northern California which is intended to detain and clean first flush storm water. The project is proposed at Cartan Field. The preliminary design is complete and the environmental review, administrative process is underway. The IS/MND draft has been received with circulation planned for fall 2019.

C.3.j.iv.(2) and (3) ► 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 waste load allocations for TMDLs are being met. *(For FY 2018-19 Annual Report only)* Submit the tracking methods used and report implementation of green infrastructure measures including treated area and connected and disconnected impervious area on both public and private parcels within their jurisdictions.
Please refer to the SMCWPPP FY 2018/19 Annual Report for: 1) a summary of methods being developed to track and report implementation of green infrastructure measures; and 2) a report on green infrastructure measures implemented to date, including acres of impervious area (total and treated), countywide and by Permittee.

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[2], Street Address	Name of Developer	Project Phase No.[3]	Project Type & Description[4]	Project Watershed[5]	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft^2)[6]	Total Replaced Impervious Surface Area (ft^2)[7]	Total Pre-Project Impervious Surface Area[8] (ft^2)	Total Post-Project Impervious Surface Area[9] (ft^2)
Private Projects											
Walking Path Replacement Project	1000 El Camino Real, Atherton, CA 94027	Menlo College	1	Remove and Replace pedestrian walking path	Atherton Channel	3.05	.86	0	37,568sf	53,800sf	37,568sf
Performing Arts Center	50 Valparaiso Ave., Atherton, CA 94027	Menlo School	1	Remove existing structures and construct new 2-story building with basement with site improvements	Atherton Channel	1.05	.80	8,670sf	11,180sf	36,850sf	19,850sf
Public Projects											

[2]Include cross streets
[3]If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".
[4]Project 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.
[5]State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.
[6]All impervious surfaces added to any area of the site that was previously existing pervious surface.
[7]All impervious surfaces added to any area of the site that was previously existing impervious surface.
[8]For redevelopment projects, state the pre-project impervious surface area.
[9]For redevelopment projects, state the post-project impervious surface area.

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[2], Street Address	Name of Developer	Project Phase No.[3]	Project Type & Description[4]	Project Watershed[5]	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft^2)[6]	Total Replaced Impervious Surface Area (ft^2)[7]	Total Pre-Project Impervious Surface Area[8] (ft^2)	Total Post-Project Impervious Surface Area[9] (ft^2)
Comments:											

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[10]	Application Final Approval Date[11]	Source Control Measures[12]	Site Design Measures[13]	Treatment Systems Approved[14]	Type of Operation & Maintenance Responsibility Mechanism[15]	Hydraulic Sizing Criteria[16]	Alternative Compliance Measures[17/18]	Alternative Certification[19]	HM Controls[20/21]
Private Projects										
Menlo School's	4/8/19	4/8/19	Retaining existing vegetati	Direct runoff to vegetated	Bio-retention	O&M agreement	3	N/A	N/A	No, under 1 acre.

[10]For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.
[11]For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.
[12]List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.
[13]List 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.
[14]List 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.).
[15]List 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.
[16]See 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).
[17]For 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.
[18]For 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.
[19]Note whether a third party was used to certify the project design complies with Provision C.3.d.
[20]If HM control is not required, state why not.
[21]If 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), biodetention 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 (private projects)

Project Name Project No.	Application Deemed Complete Date[10]	Application Final Approval Date[11]	Source Control Measures[12]	Site Design Measures[13]	Treatment Systems Approved[14]	Type of Operation & Maintenance Responsibility Mechanism[15]	Hydraulic Sizing Criteria[16]	Alternative Compliance Measures[17/18]	Alternative Certification[19]	HM Controls[20/21]
			on as practical. Material Storage. Stenciling on-site inlets	areas/minimized impervious surfaces						
Menlo College's Walking path replacement	3/29/19	3/29/19	Retaining existing vegetation as practical.	Direct runoff to vegetated areas/minimized impervious surfaces	Self-retaining Infiltration basin	O&M agreement	Volume	N/A	N/A	No, under 1 acre.

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[22]	Date Construction Scheduled to Begin	Source Control Measures[23]	Site Design Measures[24]	Treatment Systems Approved[25]	Operation & Maintenance Responsibility Mechanism[26]	Hydraulic Sizing Criteria[27]	Alternative Compliance Measures[28/29]	Alternative Certification[30]	HM Controls[31/32]
Public Projects										
Comments:										

[22]For public projects, enter the plans and specifications approval date.
[23]List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.
[24]List 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.
[25]List 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.).
[26]List 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.
[27]See 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).
[28]For 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.
[29]For 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.
[30]Note whether a third party was used to certify the project design complies with Provision C.3.d.
[31]If HM control is not required, state why not.
[32]If 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), biodetention unit(s), regional detention basin, or in-stream control).

C.3.h.v.(2). ►Table of Newly Installed[33] Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

Fill in table below or attach your own table including the same information. **Guidance: The table is intended to provide a list of all newly installed treatment measures and HM controls to vector control agencies on an annual basis before the wet season (i.e., before October 1). SMCWPPP staff will submit these tables to vector control agencies to fulfill this requirement. The facility name, address, responsible party and type of treatment/HM control should be provided for all facilities installed during FY 2018/19. Do not leave any cells blank.**

This is an optional section of the Annual Report. However, the information needs to be submitted to the vector control agency and Water Board. If your agency does not provide the required information in this section, please submit the information separately to SMCWPPP staff by September 20, 2019. SMCWPPP staff will consolidate all Permittee tables and submit them to the vector control agency and Water Board in a separate submittal prior to the wet season.

Name of Facility	Address of Facility	Party Responsible[34] For Maintenance	Type of Treatment/HM Control(s)

[33] "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.
[34] State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v.Special Projects Reporting Table

Reporting Period – July 1 2018 - June 30, 2019

Project Name & No.	Permittee	Address	Application Submittal Date[35]	Status[36]	Description[37]	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category[38]	LID Treatment Reduction Credit Available[39]	List of LID Stormwater Treatment Systems[40]	List of Non-LID Stormwater Treatment Systems[41]
The town has no special projects for report for this time period.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

[35]Date that a planning application for the Special Project was submitted.
[36] Indicate 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.
[37]Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.
[38] For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.
[39]For 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.
[40]**:** List 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.
[41]List 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 Town of Atherton has no special projects to report.

C.3.j.ii.(2) ► Table A - Public Projects Reviewed for Green Infrastructure

Project Name and Location[42]	Project Description	Status[43]	GI Included?[44]	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement[45]
Town Projects are mainly maintenance or street paving projects. By nature these projects are smaller scale, not allowing for green infrastructure features.	N/A	N/A	N/A	N/A

C.3.j.ii.(2) ► Table B - Planned and/or Completed Green Infrastructure Projects

Project Name and Location[46]	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included

[42] List each public project that is going through your agency's process for identifying projects with green infrastructure potential.
[43] Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.
[44] 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.
[45] 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.
[46] 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.

Storm Water Recapture Project- Proposed at Cartan Field.	The Town received a grant from Caltrans for green stormwater diversion and cleaning within the Atherton Channel drainage area. This was the first grant of its kind in Northern California which is intended to detain and clean first flush storm water. The project proposes to install a stormwater capture facility at Cartan Field on the campuses of Menlo College and Menlo School located at 30 Alejandra Avenue, in Atherton, California. The facility would include a diversion structure within Atherton Channel to re-direct all dry-weather urban runoff and a portion of wet-weather runoff through a pre-treatment device to remove trash, debris, and sediment before conveying the water into a buried multi-chambered storage facility with a storage capacity of up to nine (9) acre-feet. A pump system sends the water through a filter system to remove mercury and PCBs and then slowly returns filtered water back into the channel downstream of the diversion structure.	The preliminary design is complete and the environmental review, administrative process is underway. The IS/MND draft has been received with circulation planned for fall 2019.	Storm water diversion, pretreatment limited infiltration and filtration.

Town Center/ Library (Regulated)	Construction of new Town Center and Library.	Design completed and construction permits pending.	Storm water diversion, pretreatment limited infiltration and filtration.

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

Program Highlights and Evaluation
Highlight/summarize activities for reporting year:

Summary:

The County of San Mateo Health System (County Environmental Health, or CEH) notified Cities in an April 3, 2017 letter of its intent to terminate stormwater inspection agreements with the 17 Cities on December 31, 2017 due to staffing and cost concerns. As of January 1, 2018, the City is responsible for conducting all stormwater business facility inspections.

City staff received training during FY 17/18 on performing stormwater inspections for commercial facilities, as well as maintained regular contact with SMCWPPP CII Subcommittee lead. A total of two commercial inspections were performed during FY 18/19.

Refer to the C.4. Industrial and Commercial Site Controls section of SMCWPPP's FY 2018/19 Annual Report for a description of activities of the Program.

C.4.b.iii ► Potential Facilities List (i.e., List of All Facilities Requiring Stormwater Inspections)

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.

Program/Element Code	Facility ID	Street Number	Street Name	City	Name
3090	FA0000302	1000	El Camino Real	Atherton	Menlo College
3090	FA0040151	555	Middlefield	Atherton	Menlo Atherton High School
3090	FA0023661	99	Station	Atherton	Town of Atherton-Public Works Corp
3090	FA0023665	1000	El Camino Real	Atherton	Menlo College Bookstore
3090	FA0017580	120	Reservoir	Atherton	California Water Service CO BG OPS CTR
3090	FA0039121	181	Encinal	Atherton	Encinal Elementary School
3090	FA0024463	299	Alameda	Atherton	Las Lomitas School
3090	FA0024459	95	Edge	Atherton	Laurel School
3090	FA0027462	150	Valparaiso	Atherton	Sacred Heart School Atherton
3090	FA0024990	170	Selby	Atherton	Selby Lane Elementary School

3090	FA0002709	50	Valparaiso	Atherton	Menlo School
3090	FA0024994	32	Almendral	Atherton	Fire Station #3
3090	FA0002254	190	Park	Atherton	Menlo Circus Club

C.4.d.iii.(2)(a) & (c) ►Facility Inspections

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

	x	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
		Permittee reports the total number of discrete potential and actual discharges on each site.

	Number
Total number of inspections conducted (C.4.d.iii.(2)(a))	2
Violations, enforcement actions, or discreet number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(2)(c))	0

Comments:
Staff performed two (2) commercial stormwater inspections during FY 18/19. No violations or discharges were found.

C.4.d.iii.(2)(b) ►Frequency and Type of Enforcement Conducted

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

	Enforcement Action (as listed in ERP)[1]	**Number of Enforcement Actions Taken**
Level 1	Verbal Warning/ Written Notice	0
Level 2	Warning Notice or Administrative Action	0
Level 3	Administrative Action with Penalty and/or Cost Recover	0
Level 4	Legal Action	0
Total		0

C.4.d.iii.(2)(d) ► Frequency of Potential and Actual Non-stormwater Discharges by Business Category

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

Business Category[2]	**Number of Actual Discharges**	**Number of Potential Discharges**
Haz Mat (including Industrial facilities per 40 CFR; vehicle salvage yards; metal and other recycled materials collection facilities; waste transfer facilities; vehicle mechanical repair, maintenance, fueling, or cleaning facilities; building trades central facilities or yards and corporation yards; nurseries and greenhouses; building material retailers and storage; and plastic manufacturers)	0	0
Food (facilities designated by the Permitee to have a reasonable potential to contribute to pollution of stormwater runoff)	0	0

C.4.d.iii.(2)(e) ►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 Town of Atherton does not have any industries that are classified as non-fliers.

[1]Agencies to list specific enforcement actions as defined in their ERPs.
[2]List 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

Comments:
No training attended this year for commercial/industrial.

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 Town does not operate wastewater, power, or water facilities; however, does operate the stormwater utility (MS4). The Town inspected 100% of its drop inlets and underground culvert pipe prior to the first significant rains of the season. During the cleaning and inspections, no illicit discharges were noted and corrected.

The Town visually inspects all drain inlets prior to the raining season and cleans them if necessary. We begin with known problem areas (around schools and the construction sites) from the past and expand from there. Any illicit discharges will be reported and remedied at that time.

Town Staff participated in the program's CII Subcommittee

Refer to the C.5 Illicit Discharge Detection and Elimination section of the SWCWPPP FY18-19 Annual Report for description of activities at the countywide or regional level.

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

Summary of any changes made during FY 18-19.
No change.

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

Comments:
No Spill nor discharge reported.

C.5.e.iii.(2) ►Control of Mobile Sources
(a) Provide changes to your agency's minimum standards and BMPs for each of the various types of mobile businesses since the 2017 Annual Report (C.5.e.iii.(2)(a)))
The Town of Atherton follows the minimum standards and BMPs described in the "Best Management Practices for Mobile Businesses" fact sheet recently updated by the SMCWPPP CII Subcommittee in April 2019 for the following mobile business categories: automobile washers/detailers, power washers, carpet cleaners, steam cleaners, pet care services. The format of the fact sheet was update but there have been no changes to the BMPs since the 2017 Annual Report.
(b) Provide changes to your agency's enforcement strategy for mobile businesses (C.5.e.iii.(2)(b)
There have been no changes to the Town's enforcement strategy. The Town continues to take enforcement actions for mobile businesses in response to a complaint or illicit discharge through our IDDE Program. Since FY 2013/14 SMCWPPP's enforcement strategy has been to track mobile business enforcement actions from SMCWPPP permittees in a table available on the SMCWPPP CII members only webpage. The tracking table is periodically updated.
(c) Provide minimum standards and BMPs developed for additional types of mobile businesses addressed since 2017 Annual Report (C.5.e.iii.(2)(c)
SMCWPPP has not developed minimum standards and BMPs for additional types of mobile businesses other than those described in (a) above.

(d) Provide a list and summary of the specific outreach events and education conducted to each type of mobile business operating within your jurisdiction during the Permit term (C.5.e.iii.(2)(d):
Refer to the C.5 Illicit Discharge Detection and Elimination section of SMCWPPP's FY 2018/19 Annual Report for a description of activities at the countywide or regional level.
(e) Discuss inspections conducted at mobile businesses and/or job sites (C.5.e.iii.(2)(e)
The Town conducts inspections at mobile businesses in response to complaints or illicit discharges through our IDDE Program. There were no inspections conducted this FY.
(f) List below or attach the list of mobile businesses operating within your agency's jurisdiction (C.5.e.iii.(2)(f))
In FY 2016/17 SMCWPPP compiled an inventory of mobile businesses located in Santa Mateo County. The inventory was developed by reviewing lists provided by individual agencies, yellow page searches and online business searches. The inventory includes automotive washing, steam cleaning, power washing, pet care services and carpet cleaning mobile businesses. The inventory is periodically updated with mobile businesses stormwater inspectors observe during routine field activities, including responding to illicit discharges. The inventory is made available to all San Mateo County Permittees on the SMCWPPP CII members only webpage. The inventory is included in SMCWPPP's FY 2018/19 Annual Report and currently has approximately 175 mobile businesses.
(g) Discuss enforcement actions taken against mobile businesses during the Permit term (C.5.e.iii.(2)(g))
Enforcement actions are typically taken in response to a complaint or illicit discharge through our IDDE Program. Enforcement actions are tracked in the municipality's spill and discharge complaint tracking system required by MRP C.5.d.ii. This FY there were no enforcement actions taken for mobile businesses.

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.
MS4 maps are 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. The SMCWPPP website, flowstobay.org, also has a link to the Oakland museum maps.

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(3)(a), (b), (c), (d) ►Site/Inspection Totals

Number of active Hillside Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.3.a)	**Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection)** (C.6.e.iii. 3.c)	**Number of sites disturbing ≥ 1 acre of soil** (C.6.e.iii.3.b)	**Total number of storm water runoff quality inspections conducted (include only Hillside Sites, High Priority Sites and sites disturbing 1 acre or more)** (C.6.e.iii. 3.d)
5	0	12	76

Comments:
All inspections are for residential single-family homes. All sites were inspected during the wet season (unless a permit was finaled within the wet season, at which point inspections for that particular site would cease). 54 non-required single-family home inspections, and follow up inspections, were conducted by the Town in addition to the ones above. Construction sites were required to correct any items within 10 business days.

C.6.e.iii.(3)(e) ►Construction Related Storm Water Enforcement Actions

	Enforcement Action (as listed in ERP)[1]	**Number Enforcement Actions Issued**
Level 1[2]	Verbal Warning to Correct	13
Level 2	Notice of Violation	0
Level 3	Administrative Order	0
Level 4	Administrative Penalty/ Legal Action	0
Total	**13**	**13**

[1]Agencies should list the specific enforcement actions as defined in their ERPs.
[2]For example, Enforcement Level 1 may be Verbal Warning.

C.6.e.iii.(3)(f), ►Illicit Discharges

	Number
Number of illicit discharges, actual and those inferred through evidence at hillside sites, high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii. 3.f)	0

C.6.e.iii.(3)(g) ► Corrective Actions

Indicate your reporting methodology below.

X	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
	Permittee reports the total number of discrete potential and actual discharges on each site.

	Number
Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii. .3.g)	0

Comments:

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:

No violations occurred, but verbal warnings were issued. Inspectors re-inspected within 10 days to ensure that any violations were corrected. Contractors are educated on site to comply with requirements. More verbal warnings were given out compared to the previous year.

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:

The Town currently holds bi-monthly development round table meetings for stakeholders in the development field. These meetings often focus on BMP/SWMPP and other grading and drainage issues. Staff participated in SMCWPPP's New Development Subcommittee.

Refer to the C.6 Construction Site Control section of the SMCWPPP FY 18-19 Annual Report for a description of activities at the countywide or regional level.

C.6.f.iii ►Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance
Construction Site Stormwater Inspections Training for Municipal Inspectors	March 11, 2019	Inlet Protection, Sediment and Erosion Control, Construction Site Regulations and BMPs	1

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.

Summary:

See Section 7 and Section 9 of the SMCWPPP FY 18-19 Annual Report for a description of outreach campaign activities conducted at the countywide level.

C.7.c. Stormwater Pollution Prevention Education

No Change

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 Section 7 of the SMCWPPP FY 2018/19 Annual Report for a description of public outreach and citizen involvement events activities conducted at the countywide level.

Event Details	**Description** (messages, audience)	**Evaluation of Effectiveness**
Provide event name, date, and location. Earth Day 2019 Event, May 4, 2019, Holbrook palmer Park. Local town event public outreach and citizen involvement.	The Town held an Earth Day Event on May 4, 2019. The event consisted of a series of talks and a panel on Climate Change. The event program featured: • *"Climate Change: Where Do We Stand and What do We Do About It?"* a presentation by Franklin "Lynn" Orr PhD • *"How Climate Change Can Impact Your Water Supply"*, a presentation by Peter Drekmeier • *"Knowledge is Power: Together We Can Save Our Planet"*, a panel moderated by Atherton Vice Mayor, Rick DeGolia. The panel consisted of Jan Pepper, CEO of Peninsula Clean Energy; Steve Schmidt, founder of Home Energy Analytics; Teresa Herrera, Plant Manager of Silicon Valley Clean Water; and Rachael Londer from the San Mateo County Office of Sustainability.	Overall feedback received by Town staff from community members was that the event was well received. Event goers were engaged during the presentations, as well as the questions and answers session for the panel.

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 Section 7 of the SMCWPPP FY 2018/19 Annual Report for a description of watershed stewardship collaborative efforts conducted at the countywide level.

Bayfront Canal Project: https://bayfrontwatershed.org/
San Mateo County is collaborating with Redwood City, the City of Menlo Park and the Town of Atherton to develop projects that provide flooding relief in low-lying communities next to Bayfront Canal and Atherton Channel.

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 Section 7 of the SMCWPPP FY 2018/19 Annual Report for a description of school-age children outreach efforts conducted at the countywide level.

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
N/A	N/A	N/A	N/A

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, carbamates fipronil, indoxacarb, diuron, and diamides. A separate report can be attached as evidence of your implementation.

Trends in Quantities and Types of Pesticide Active Ingredients Used[1]

Pesticide Category and Specific Pesticide Active Ingredient Used	Amount[2]					
	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21
Organophosphates				0		
Active Ingredient Chlorpyrifos				0		
Active Ingredient Diazinon				0		
Active Ingredient Malathion				0		
Pyrethroids (see footnote #2 for list of active ingredients)				0		
Active Ingredient Type X		0.08	0.17fl oz	0		
Active Ingredient Type Y		0.005		0		
LambdaStar 9.7CS (Synthetic)	0.09ox			0		
Suspend SC	1oz			0		
Carbamates				0		
Active Ingredient Carbaryl				0		
Active Ingredient Aldicarb						

[1]Includes all municipal structural and landscape pesticide usage by employees and contractors.
[2]Weight or volume of the 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.

0

Fipronil						
Pesticide Category and Specific Pesticide Active Ingredient Used	**Amount**					
	FY 15-16	**FY 16-17**	**FY 17-18**	**FY 18-19**	**FY 19-20**	**FY 20-21**
Indoxacarb	Reporting not required in FY 15-16			0		
Diuron	Reporting not required in FY 15-16			0		
Diamides	Reporting not required in FY 15-16			0		
Active Ingredient Chlorantraniliprole				0		
Active Ingredient Cyantraniliprole				0		

Reasons for increases in use of pesticides that threaten water quality: N/A

IPM Tactics and Strategies Used:

IPM Tactics and Strategies Used:

IPM is used to manage all kinds of pests anywhere in the Town of Atherton's landscape, park, urban forest, or natural areas. The objective of MCE's (Town of Atherton's pest management contractor) IPM Program is to keep pest populations below levels that are incompatible with the Town of Atherton's standards. MCE Corporation has found that the combination of the following methods work best to attain our stated objective. Approaches for managing pests are often grouped in the following categories.

- ***Biological control***

Biological control is the use of natural enemies—predators, parasites, pathogens, and competitors—to control pests and their damage. Invertebrates, plant pathogens, nematodes, weeds, and vertebrates have many natural enemies. As an example MCE Corporation partners with RINCON VITOVA INSECTARY to identify a pest (aphid, white fly, scale etc) and select the best possible predator (Green Lace Wing, Lady Beetles etc) to control the pest. During the 18/19 Fiscal Year staff spent 19.5 hours placing pheromone Yellow Jacket Traps and mechanical gopher traps to monitor and control the pest's population and reduce the amount of pesticides used on the site. In the event these methods are ineffective then other types of controls are used to control the pest. This year staff transitioned away from the use of pyrethroids and has incorporated the use of organics such as thyme and rosemary oil.

- ***Cultural controls***

Cultural controls are practices that reduce pest establishment, reproduction, dispersal, and survival. For example, proper mowing heights or changing irrigation practices can reduce pest problems, since too much water can increase root disease and weeds. These practices are constantly evaluated by us as well as our contractor and problem areas are remedied where possible on an ongoing basis. Staff adjusted mowing heights twice a year to maximize the turf's natural ability to control the weed population. Using Atherton's Centralized Irrigation System staff was able to adjust irrigation run times based on daily Evapo-Transpiration (ET) rates. Staff spent 31 hours a year aerating the turf to reduce compaction, increase water penetration to improve the turf's health and vigor. Staff spent 29 hours replacing bedding materials with plants approved by the Park and Recreation Committee. Staff has whenever possible, pruned out damaged and diseased limbs and foliage. In the event these methods are ineffective then other types of controls are used to control the pest. This year staff transitioned away from the use of pyrethroids

- ***Mechanical and physical controls***

Mechanical and physical controls kill a pest directly or make the environment unsuitable for it. Staff spent 79.5 hours adding and spreading mulch throughout the park to keep down the weed population, improve soil moisture levels and beneficial soil organisms. Staff spent 412.5 hours hand weeding the site to control weeds and help reduce the pesticides used on the site. Staff authorized a contractor to remove many Monkey Puzzle pods for the sake of Public Safety. In the event these methods are ineffective, other types of controls are used. This year staff transitioned away from the use of pyrethroids

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.	0
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	0
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:

The Town of Atherton contracts all of pesticide applications to a private contractor. No municipal employees are directly involved in pesticide application.

C.9.c ►Require Contractors to Implement IPM

Did your municipality contract with any pesticide service provider in the reporting year, for either landscaping or structural pest control?	x	**Yes**		**No**
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	x	**Yes**		**No,**

If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored

Prior to any chemical use in our Town, staff is informed of their desire to spray a desired pesticide. Following this request, staff requires verbal justification of why this method is the proper one is being used. More times than not, these devices are being used in addition to mechanical and cultural methods that have had some failures in spot or limited locations such as weeds growing up through heavy mulched areas or weeds in areas where hand removal requires high levels of employee exposure in dangerous locations (mainly traffic). This usage is always used in "spot" applications and the Town forbids broadcast pesticide applications in all instances.

The Town of Atherton contracts with MCE. MCE employees receive annual Pesticide Worker Safety Training (of which IPM is an element). The training is approved by the Department of Pest Regulations. MCE conducts applications as well as subcontracts with Del Conte Landscape Company and Hitman Pest Control. The Town of Atherton is notified of all pesticide use prior to its application, and reviews whether alternative methods (other than pesticide application) can be used. MCE Provides training approved by the State of California's Department of Pesticide Regulation. This training is led by Edward Murdock, who possesses the following certifications from the State of California. (1) Pest Control Advisor License (2) Qualified Applicator License (3) Other Trained Personnel. In addition, Atherton staff receives and reviews copies of the Monthly Pesticide Use Report submitted to the County Agricultural Commissioner's Office.

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,		Yes	x	No

If yes, summarize the communication. If no, explain. See Section 9 of the SMCWPPP FY 18-19 Annual Report for a 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.		**Yes**	x	**No**

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 Section 9 of the SMCWPPP FY 18-19 Annual Report for a description of point of purchase public outreach efforts conducted at the countywide level 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.

Summary:

See Section 9 of the SMCWPPP FY 18-19 Annual Report for a summary of outreach to residents who hire pest control and landscape professionals.

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 Section 9 of the SMCWPPP FY 18-19 Annual Report for a summary of 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.

Summary:

During FY 18-19, we participated in regulatory processes related to pesticides through contributions to the Countywide Program, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.

C.9.g. ► Evaluate Implementation of Pesticide Source Control Actions

(For FY 18-19 Annual Report only) Submit an evaluation that assesses; 1) the effectiveness of IPM efforts required in Provisions C.9.a-e and g, 2) a discussion of any improvements made in the past five years; 3) any changes in water quality regarding pesticide toxicity in urban creeks; and 4) a brief description of one or more pesticide-related area(s) the Permittee will focus on enhancing during the subsequent permit term.

Summary:

See the appendices to SMCWPPP's FY 2018/19 Annual Report for a report that includes the following:

- **An evaluation of the effectiveness of source control measures for pesticides and toxicity that have been implemented;**
- **An evaluation of water quality in relation to pesticides and toxicity in urban creeks;**
- **Improvements made to Town of Atherton's IPM Program during this permit term; and**
- **Pesticide-related area(s) that Atherton will focus on enhancing during the next permit term.**

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

Trash Load Reductions	
Percent Trash Reduction in All Trash Management Areas (TMAs) due to **Trash Full Capture Systems** (as reported C.10.b.i)	0.0%
Percent Trash Reduction in all TMAs due to **Control Measures Other than Trash Full Capture Systems** (as reported in C.10.b.ii)[1]	85.6%
Percent Trash Reduction due to **Jurisdictional-wide Source Control Actions** (as reported in C.10.b.iv)	N/A
SubTotal for Above Actions	**85.6%**
Trash Offsets (Optional)	
Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	0.0%
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	0.0%
Total (Jurisdictional-wide) % Trash Load Reduction through FY 2018-19	**85.6%**

Discussion of Trash Load Reduction Calculation and Attainment of the 80% Mandatory Deadline:
The Town attained and reported 89.2% trash load reduction (including trash offsets) in its FY 17-18 Annual Report. During FY 18-19, the Town continued to implement a robust trash control measure program. This helped the Town maintain its trash load reduction above the mandatory 80% trash load reduction requirement included in the MRP. The total (jurisdiction-wide) percent trash load reduction in FY 18-19 is 85.6%. The most recent version of the Town's Baseline Trash Generation Map can be downloaded at URL here:
http://www.flowstobay.org/content/municipaltrash-generation-maps

[1] See Appendix 10-1 for changes between 2009 and FY 18-19 in trash generation by TMA as a result of Full Capture Systems and Other Measures.

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 18-19, during FY 18-19, 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 in FY 18-19		
The Town of Atherton has no Full Capture Devices	NA*	NA*
Installed Prior to FY 18-19		
The Town of Atherton has no Full Capture Devices	NA*	NA*
Total for all Systems Installed To-date	**NA***	**NA***
Treatment Acreage Required by Permit (Population-based Permittees)		**0***
Total # of Systems Required by Permit (Non-population-based Permittees)		**NA***

*The Town of Atherton is exempt from MRP Permit Provision C.10.a.iii due to having a population of 6,914 (2010 US Census) and 0 acres of retail/wholesale land. As a result, the Town of Atherton does not currently have, nor plans to install, full trash capture devices. The Town is addressing trash load reductions through other control measures.

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

Provide the following:

1) Jurisdictional-wide trash reduction in FY 18-19 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) The percentage of systems in FY 18-19 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 in FY 18-19	Summary of Maintenance Issues and Corrective Actions
1	0.0%	0	NA	NA
2	0.0%			
3	0.0%			
4	0.0%			
Total	**0.0%**			

Certification Statement:

Not Applicable. Consistent with the MRP, the Town is exempt from the Minimum Full Trash Capture of the MRP Provision C.10.a.iii due to having a population of less than 12,000 and retail/wholesale commercial land use of less than 40 acres. As a result, the Town of Atherton does not currently have, nor plans to install, full trash capture devices. The Town is addressing trash load reductions through other control measures.

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
1	The Town of Atherton has identified its worst trash area as El Camino Real. It is cleaned weekly (4 hours a week) via manual litter pickup.
2	All storm drains in the town are inspected in all TMA's and cleaned (if necessary) prior to October 1, on an annual basis.

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 or acres available for assessment (i.e., those associated with VH, H, or M trash generation areas not treated by full capture systems), the street miles or acres assessed, the % of available street miles or acres assessed, and the average number of assessments conducted per site within the TMA; and
2) Percent jurisdictional-wide trash reduction in FY 18-19 attributable to trash management actions other than full capture systems implemented in each TMA; OR
3) Indicate that no on-land visual assessments were performed.

If no on-land visual assessments were performed, check here **and state why:**	X	**Explanation:** No OVTAs were conducted in TMA #4 in FY 18-19 because the entire TMA is low trash generating as illustrated in the Town's baseline trash generation map.

TMA ID or *(as applicable)* Control Measure Area	**Total Street Miles[2] Available for Assessment**	**Summary of On-land Visual Assessments[3]**			**Jurisdictional-wide Reduction (%)**
		Street Miles Assessed	**% of Available Street Miles Assessed**	**Avg. # of Assessments Conducted at Each Site[4,5]**	
1	1.83	0.41	22.2%	6.0	71.6%
2	0.27	0.20	74.1%	6.0	1.3%
3	0.13	0.13	100.0%	6.0	12.7%
4*	0.00	NA	NA	NA	NA
Total		**0.82**	**-**	**-**	**85.6%**

*TMA 4 is entire low trash generating and has therefore achieved the trash load reduction goal (i.e., no adverse impacts or full capture system equivalent).

[2] Street miles are defined as the street lengths and do not include curbs associated with medians.
[3] Assessments conducted between July 2017 and July 2019 are assumed to be representative of trash levels in FY 18-19 and were therefore used to calculate the jurisdictional-wide reductions reported in this section.
[4] Each assessment site is roughly 1,000 feet in length.
[5] Based on analyses conducted as part of the BASMAA Tracking California's Trash project (BASMAA 2017) funded by the State Water Resources Control Board, the optimal number of assessment events to detect an improvement from baseline trash levels at a site is between 4 and 6 per site.

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 estimate the associated reduction of trash within your jurisdictional area. Note: There is a maximum of 10% total credit for source controls.

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction
N/A	N/A	N/A	N/A	N/A

C.10.b.v ► Trash Reduction – Receiving Water Monitoring

Report on the progress of developing and testing your agency's trash receiving water monitoring program.

In FY 18-19, the Town continued implementing the BASMAA Regional Receiving Water Trash Monitoring Program Plan that was approved by the Water Board's Executive Officer. Implementation included preparing for and conducting qualitative assessments and quantitative monitoring in receiving water locations within the Town of Atherton. Implementation occurred through both the Town's own efforts and participation in the San Mateo County Water Pollution Prevention Program (SMCWPPP). Consistent with MRP requirements, a preliminary report describing data results and findings to-date was submitted to the Water Board via BASMAA on July 1, 2019 on behalf of all Permittees. The final report for the development and testing of the Bay Area trash receiving water monitoring program will be submitted by BASMAA by July 1, 2020, consistent with the MRP requirements, following peer review.

In addition to implementing the BASMAA Monitoring Plan, the Town coordinated (via SMCWPPP) on the Statewide Trash Monitoring Methods Project, which is funded by the California Ocean Protection Council and State Water Board and administered via the Southern California Coastal Water Research Project (SCCWRP) and San Francisco Bay Estuary Institute (SFEI).

Additional information on accomplishments in FY 18-19 can be found in the Receiving Water Trash Monitoring Program Progress Report included in the SMCWPPP FY 18-19 Annual Report.

C.10.c ► Trash Hot Spot Cleanups

Provide the FY 18-19 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 18-19.

Trash Hot Spot	New Site in FY 18-19 (Y/N)	FY 18-19 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18	FY 2018-19*
ATH01 Middlefield/Marsh	N	5/24/19	0.2	0.2	0	0.03	0

*No trash was found during the FY 18-19 cleanup event.

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), baseline trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your baseline trash generation map was revised and if so what information was collected to support the revision. If your baseline trash generation map was revised, attach it 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 Town'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)	N/A

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 18-19. 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 18-19	Offset (% Jurisdiction-wide Reduction)
Additional Creek and Shoreline Cleanups (Max 10% Offset)	The Atherton channel is inspected and cleaned as necessary, on an annual basis. 95% of all trash collected is organic material (branches, leaves, etc).	N/A	N/A
Direct Trash Discharge Controls (Max 15% Offset)	N/A	N/A	N/A

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 18-19.[6]

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 18-19 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 18-19 After Accounting for Full Capture Systems and Other Control Measures					Jurisdiction-wide Reduction via Other Control Measures (%)	Jurisdiction-wide Reduction via Full Capture AND Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1	0	154	0	0	154	0	154	0	0	154	0%	129	25	0	0	154	71.6%	71.6%
2	0	4	0	0	4	0	4	0	0	4	0%	2	1	0	0	4	1.3%	1.3%
3	0	23	0	0	23	0	23	0	0	23	0%	23	0	0	0	23	12.7%	12.7%
4	2,968	0	0	0	2,968	2,968	0	0	0	2,968	NA	2,968	0	0	0	2,968	NA	NA
Totals	2,968	181	0	0	3,148	2,968	181	0	0	3,148	0%	3,129	20	0	0	3,148	85.6%	85.6%

Note: "NA" indicates that the TMA has no moderate, high or very high trash generating areas (i.e., all low trash generation and/or non-jurisdictional) and therefore no additional trash control measures are needed.

[6] Due to rounding, total acres and percentages presented in this table may be slightly different than the sum of the acres/percentages in the corresponding rows/columns (e.g., differ by 1 acre or 0.1%).

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

See the Countywide Program's FY 2018/19 Annual Report for updated information on:

- **Documentation of mercury control measures implemented in our agency's jurisdictional area for which load reductions will be reported and the associated management areas;**
- **A description of how the BASMAA Interim Accounting Methodology[1] was used to calculate the mercury load reduced by each control measure implemented in our agency's jurisdictional area and the calculation results (i.e., the estimated mercury load reduced by each control measure);**
- **Supporting data and information necessary to substantiate the load reduction estimates; and**
- **For Executive Officer approval, any refinements, if necessary, to the measurement and estimation methodologies to assess mercury load reductions in the subsequent permit.**

C.11.c ► Plan and Implement Green Infrastructure to Reduce Mercury Loads

See the Countywide Program's FY 2018/19 Annual Report for information on the quantitative relationship between green infrastructure implementation and mercury load reductions, including all data used and a full description of models and model inputs relied on to establish this relationship.

C.11.e ► Implement a Risk Reduction Program

A summary of Countywide Program and regional accomplishments for this sub-provision are included in the Countywide Program's FY 2018/19 Annual Report.

[1]BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.0. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., September 19, 2016.

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

See the Countywide Program's FY 2018/19 Annual Report for:

- **Documentation of PCBs control measures implemented in San Mateo County municipal jurisdictional areas for which load reductions will be reported and the associated management areas;**
- **A description of how the BASMAA Interim Accounting Methodology[1] was used to calculate the PCBs load reduced by each control measure implemented in San Mateo County municipal jurisdictional areas and the calculation results (i.e., the estimated PCBs load reduced by each control measure);**
- **Supporting data and information necessary to substantiate the load reduction estimates; and**
- **For Executive Officer approval, any refinements, if necessary, to the measurement and estimation methodologies to assess PCBs load reductions in the subsequent permit.**

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

See the Countywide Program's FY 2018/19 Annual Report for, as part of reporting for C.12.b.iii(2), an estimate of the amount of PCBs load reductions resulting from green infrastructure implementation during the term of the Permit, including all data used and a full description of models and model inputs relied on to generate the estimate.

[1]BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.1. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., September 19, 2017.

C.12.f. ► Manage PCB-Containing Materials During Building Demolition

On July 1, 2019, was your agency ready to implement a method for identifying applicable structures (buildings built or remodeled between 1950 and 1980, except that single family residential and wood-framed buildings are exempt) that apply for a demolition permit?	X	**Yes**		**No**
On July 1, 2019, was your agency ready to implement a method to manage PCBs during demolition of applicable structures?[2]	X	**Yes**		**No**
Does your agency have a data-gathering method in place to inform reporting on the effectiveness of your agency's program to manage PCBs during demolition of applicable structures (e.g., the number of applicable structures, and the amount and concentration of PCBs in priority building materials in applicable structures)?	X	**Yes**		**No**

C.12.h ►Implement a Risk Reduction Program

A summary of Countywide Program and regional accomplishments for this sub-provision are included in the Countywide Program's FY 2018/19 Annual Report.

[2] The new PCBs screening/sampling program itself is considered a stormwater control method for PCBs during demolition of applicable structures, consistent with the requirements of MRP C.12.f. The overall program will lead to management of priority PCBs-containing materials during demolition. For example, the project applicant is required to characterize PCBs concentrations in priority building materials and then must certify that "…I understand my responsibility for knowing and complying with all relevant laws and regulations related to reporting, abating, and handing and disposing of PCBs materials and wastes", which should result in removal and proper disposal of PCBs-containing materials during demolition of an applicable structure (especially when PCBs concentrations are ≥ 50 ppm).

Section 13 - Provision C.13 Copper Controls

C.13.a.iii.(3) ►Manage Waste Generated from Cleaning and Treating of Copper Architectural Features

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:

The Town of Atherton makes a "Requirements for Architectural Copper" Fact Sheet, which can be located at (www.flowstobay.org/files/newdevelopment/flyersfactsheets/ArchitecturalcopperBMPs.pdf), readily available on its "General Building Information website to building permit applications for roof replacement or new buildings. The Town has a stormwater ordinance that regulates discharges to our storm drain system.

C.13.b.iii.(3) ►Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals

Provide summaries of any enforcement activities related to copper-containing discharges from pools, spas, and fountains.

Summary:

The Town of Atherton 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 and SMCWPPP has a new fact sheet BMPs for Swimming Pools, Hot Tubs & Fountain Water Discharges available on the SMCWPPP website (https://www.flowstobay.org/sites/default/files/Pools%20%26%20Spas%20BMP%20Brochure.pdf)

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 Town of Atherton does not have any Industrial sources of copper as it is almost entirely residential.

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 Town of Atherton adopted Water Efficient Landscape Requirements in 2015, which include Landscaping Efficiency Guidelines, Worksheets, Certificates of Completion, and Fact Sheets.

The Town also makes information regarding less toxic pest control and landscape management, and drought tolerant/ native vegetation available in the form of handouts.

The Town of Atherton adopted Cal Water's Schedule 14.1 filing and started to include the consumer's water budget in monthly bills.

Related countywide efforts may be described in the following sections of the SMCWPPP FY 2018/19 Annual Report: C.3 New Development and Redevelopment, C.7. Public Information and Outreach, C.9. Pesticide Toxicity Control, and C.15 Exempted and Conditionally Exempted Discharges.