



Town of Atherton

**Planning Department
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September 30, 2017

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

Subject: **Town of Atherton**
FY 2016/17 Annual Report

Dear Mr. Wolfe:

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 2016/17 and related accomplishments.

Please contact Steven Tyler at 750-752-0541 regarding any questions or concerns.

Very truly yours,



George Rodericks
City Manager



Town of Atherton

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Town of Atherton FY 2016/17 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:


Name and Title

City Manager 9.27.17
Date

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Section 1 - Permittee Information

Background Information					
Permittee Name:	Town of Atherton				
Population:	7,147 (as of July 2014; US Census Bureau)				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2015-0049				
Reporting Time Period (month/year):	July 2016 through June 2017				
Name of the Responsible Authority:	George Rodericks	Title:	Town Manager		
Mailing Address:	91 Ashfield Road				
City:	Atherton	Zip Code:	94027	County:	San Mateo
Telephone Number:	650-753-0504	Fax Number:			
E-mail Address:	grodericks@ci.atherton.ca.us				
Name of the Designated Stormwater Management Program Contact (if different from above):	Steve Tyler	Title:	Public Works Superintendent		
Department:	Public Works				
Mailing Address:	91 Ashfield Road				
City:	Atherton	Zip Code:	94027	County:	San Mateo
Telephone Number:	650-752-0541	Fax Number:			
E-mail Address:	styler@ci.atherton.ca.us				

Section 2 - Provision C.2 Reporting Municipal Operations

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

Summary:
 Chaired the SMCWPPP Municipal Maintenance Subcommittee September and November 2016 meetings. Refer to the C.2. Municipal Operations section of the Programs FY16/17 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 BMP's 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
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NA	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs
----	--

Comments:
 No Mobile Cleaning Service was used by the Town in FY 16/17. 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:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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"/> Y	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
<input type="checkbox"/> Y	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
<input type="checkbox"/> Y	No impact to creek functions including migratory fish passage during construction of roads and culverts
<input type="checkbox"/> Y	Inspection of rural roads for structural integrity and prevention of impact on water quality
<input type="checkbox"/> NA	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
<input type="checkbox"/> NA	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"/> 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 16/17 FY.	

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"/>	NA We do not have a corporation yard			
<input type="checkbox"/>	NA Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit			
<input checked="" type="checkbox"/>	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:				
<input checked="" type="checkbox"/>	X Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment			
<input checked="" type="checkbox"/>	X Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system			
<input type="checkbox"/>	NA Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method			
<input checked="" type="checkbox"/>	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			
<input checked="" type="checkbox"/>	X Cover and/or berm outdoor storage areas containing waste pollutants			
Comments: All vehicle washing is done in the City of Redwood City Corporation Yard in their enclosed washing room. The washroom has triple stage purification and flows into the sanitary sewer.				
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 maintenance occurs off-site.	9/22/16	No findings to report – all applicable BMPs being implemented.	n/a

² Minimum inspection frequency is once a year during September.

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C.2 – Municipal Operations

Permittee Name: Town of Atherton

	All vehicle fueling is performed by a hand pump.			
150 Watkins Avenue	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.	9/21/16	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.(1) ► Regulated Projects Approved Prior to C.3 Requirements

(For FY 2016-17 Annual Report only) Does your agency have any Regulated Projects that were approved with no Provision C.3 stormwater treatment requirements under a previous MS4 permit and that did not begin construction by January 1, 2016 (i.e., that are subject to Provision C.3.b.i.(2))?

	Yes	X	No
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If yes, complete attached Table C.3.b.iv.(1). There are no regulated projects approved within Atherton’s jurisdiction during this reporting period.

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.

N/A

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.?

	Yes	X	No
--	-----	---	----

Comments (optional): n/a

C.3.e.v. ► Special Projects Reporting

1. In FY 2016-17, 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 2016-17, 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
The Town has no special projects in this reporting period.				
<p>If you answered "Yes" to either question,</p> <ol style="list-style-type: none"> 1) Complete Table C.3.e.v. 2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project. <p>The Town has no special projects in this reporting period.</p>				

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

<p>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.</p>
<p>The Town of Atherton does not have any newly installed stormwater treatment systems or HM controls.</p>

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 (FY15-16)	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 16-17)	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 16-17)	1
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 16-17)	25%

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 improve 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: Program as updated by 6-30-17 is proving effective and working as designed – no issues to date.

C.3.h.v.(4) ► Enforcement Response Plan				
(For FY 2016-17 Annual Report only) Has your agency completed an Enforcement Response Plan for all O&M inspections of stormwater treatment measures by July 1, 2017?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If No, provide schedule for completion:				

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. We are using the following Program and BASMAA products for C.3.i implementation: <ul style="list-style-type: none"> • 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)(a) ► Green Infrastructure Framework or Work Plan				
(For FY 2016-17 Annual Report only) Was your agency’s Green Infrastructure Framework or Work Plan approved by the agency’s governing body, mayor, city manager, or county manager by June 30, 2017?	<input type="checkbox"/>	Yes, approval documentation attached	<input checked="" type="checkbox"/>	No
If Yes, describe approval process and documentation:				
If No, provide schedule for completion: Town is working on formulating this and is aiming for completion by FY 17/18. The proposed Town Center, as approved and as may be budgeted, will incorporate Green Infrastructure Principles, but otherwise no early implementation or Work Plan creation has taken place, due to the rural nature of the Town and the existing “green” infrastructure policy that is exhibited and applied with all new projects. It is the Town’s current policy for all new encroachment permits for construction within the right of way to be permeable. Only the ingress and egress of the adjacent property				

are allowed to be impervious. The Town is currently in process of updating the General Plan which will include specific policies related to Green Infrastructure framework.

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:

Please refer to the SMCWPPP FY 16-17 Annual Report for a summary of outreach efforts implemented. Town's Climate Action includes policies EC1 and EC4 s promoting green infrastructure in residential and commercial new construction.

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.
It is noted that approximately 95% of encroachment permits for construction within the right of way to be permeable. Only the ingress and egress of the adjacent property are allowable to be impervious.. Refer to BASMAA guidance on identifying and reviewing potential green infrastructure projects.

Summary of Planning or Implementation Status of Identified Projects:
The Town is in process of receiving a grant from Caltrans for green stormwater diversion and cleaning within the Atherton Channel. This is the first grant of its kinds in Northern California which is intended to detain and clean first flush stormwater.

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 16-17 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 16-17 Annual Report for a summary of methods being developed to track and report implementation of green infrastructure measures.

C.3.b.iv.(1) ▶ List of Regulated Projects Approved Prior to C.3 Requirements

Project Name Project No.	Project Location ³ , Street Address	Type of Stormwater Treatment Required ⁴	Type of Exemption Granted ⁵
n/a - There are no Regulated Projects within Atherton's jurisdiction during this reporting period			

³ Include cross streets

⁴ Indicate the stormwater treatment system required, if applicable

⁵ Indicate the type for exemption, if applicable. For example, the project was previously approved with a vesting tentative map, or the Permittee has no legal authority to require changes to previously granted approvals (such as previously granted building permits).

**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 ⁶ , Street Address	Name of Developer	Project Phase No. ⁷	Project Type & Description ⁸	Project Watershed ⁹	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ¹⁰	Total Replaced Impervious Surface Area (ft ²) ¹¹	Total Pre- Project Impervious Surface Area ¹² (ft ²)	Total Post- Project Impervious Surface Area ¹³ (ft ²)
Private Projects											
n/a - There are no Regulated Projects within Atherton's jurisdiction during this reporting period											
Public Projects											
n/a - There are no Regulated Projects within Atherton's jurisdiction during this reporting period											
Comments:											

⁶Include cross streets

⁷If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

⁸Project 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.

⁹State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

¹⁰All impervious surfaces added to any area of the site that was previously existing pervious surface.

¹¹All impervious surfaces added to any area of the site that was previously existing impervious surface.

¹²For redevelopment projects, state the pre-project impervious surface area.

¹³For 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 ¹⁴	Application Final Approval Date ¹⁵	Source Control Measures ¹⁶	Site Design Measures ¹⁷	Treatment Systems Approved ¹⁸	Type of Operation & Maintenance Responsibility Mechanism ¹⁹	Hydraulic Sizing Criteria ²⁰	Alternative Compliance Measures ^{21/22}	Alternative Certification ²³	HM Controls ^{24/25}
Private Projects										
n/a - There are no Regulated Projects within Atherton's jurisdiction during this reporting period.										

¹⁴For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁵For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁶List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

¹⁷List 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.

¹⁸List 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.).

¹⁹List 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.

²⁰See 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).

²¹For 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.

²²For 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.

²³Note whether a third party was used to certify the project design complies with Provision C.3.d.

²⁴If HM control is not required, state why not.

²⁵If 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 ²⁶	Date Construction Scheduled to Begin	Source Control Measures ²⁷	Site Design Measures ²⁸	Treatment Systems Approved ²⁹	Operation & Maintenance Responsibility Mechanism ³⁰	Hydraulic Sizing Criteria ³¹	Alternative Compliance Measures ^{32/33}	Alternative Certification ³⁴	HM Controls ^{35/ 36}
Public Projects										
n/a - There are no Regulated Projects within Atherton's jurisdiction during this reporting period.										
Comments:										

²⁶For public projects, enter the plans and specifications approval date.

²⁷List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²⁸List 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.

²⁹List 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.).

³⁰List 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.

³¹See 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).

³²For 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.

³³For 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.

³⁴Note whether a third party was used to certify the project design complies with Provision C.3.d.

³⁵If HM control is not required, state why not.

³⁶If 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 Installed³⁷ Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

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

The Town of Atherton does not have any newly installed stormwater treatment systems or HM controls.

Name of Facility	Address of Facility	Party Responsible ³⁸ For Maintenance	Type of Treatment/HM Control(s)
n/a			

³⁷ "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

³⁸ State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v. ► Special Projects Reporting Table												
Reporting Period – July 1 2016 - June 30, 2017												
Project Name & No.	Permittee	Address	Application Submittal Date ³⁹	Status ⁴⁰	Description ⁴¹	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category ⁴²	LID Treatment Reduction Credit Available ⁴³	List of LID Stormwater Treatment Systems ⁴⁴	List of Non-LID Stormwater Treatment Systems ⁴⁵
no special projects to report									Category A: Category B: Category C: Location: Density: Parking:	Category A: Category B: Category C: Location: Density: Parking:	Indicate each type of LID treatment system and % of total runoff treated.	Indicate each type of non-LID treatment system and % of total runoff treated. Indicate whether minimum design criteria met or certification received

³⁹Date that a planning application for the Special Project was submitted.

⁴⁰ 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.

⁴¹Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

⁴² For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

⁴³For 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.

⁴⁴: 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.

⁴⁵List 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 ⁴⁶	Project Description	Status ⁴⁷	GI Included? ⁴⁸	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement ⁴⁹
There were no projects that required review.				

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

Project Name and Location ⁵⁰	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Civic Center Project	Redevelopment of the Town's existing Town Center with the "Civic Center Project; including construction of new buildings within the Civic Center that include Council Chambers, library, facade administration, the police department, the building department and public works. Bringing together public services and public spaces, the Civic Center project hopes to create a "there there" to a between meeting the community's service needs at one location and providing a space for civic engagement. The overall objective being to design and build a functional and attractive civic space for the Town's Administrative and Public Safety Services while simultaneously providing a environment for Atherton residents to conduct Town business.	As of March 2017, the project has entered the Construction drawing phase.	Potential measures to be considered as plans are developed.

⁴⁶ List each public project that is going through your agency's process for identifying projects with green infrastructure potential.

⁴⁷ Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.

⁴⁸ 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.

⁴⁹ 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.

⁵⁰ 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:

County Environmental Health (CEH): Food and Haz Mat program inspectors conduct routine Stormwater Inspections at inventoried sites. There are no additional industrial or commercial sites within the Town.

Prior to CEH discontinuing inspections, CEH will provide training to town staff for Stormwater Inspections.

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

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.

Address / Location	Program/Element Code	Facility ID	Street Number	Street Name	City	Name
Atherton	3090	FA0000302	1000	El Camino Real	Atherton	Menlo College
Atherton	3090	FA0040151	555	Middlefield	Atherton	Menlo Atherton High School
Atherton	3090	FA0018347	3275	El Camino Real	Atherton	Poly Clean CTR
Atherton	3090	FA0023661	99	Station	Atherton	Town of Atherton-Public Works Corp
Atherton	3090	FA0023665	1000	El Camino Real	Atherton	Menlo College Bookstore
Atherton	3090	FA0017580	120	Reservoir	Atherton	California Water Service CO BG OPS CTR
Atherton	3090	FA0039121	181	Encinal	Atherton	Encinal Elementary School
Atherton	3090	FA0024463	299	Alameda	Atherton	Las Lomas School
Atherton	3090	FA0024459	95	Edge	Atherton	Laurel School

Atherton	3090	FA0027462	150	Valparaiso	Atherton	Sacred Heart School Atherton
Atherton	3090	FA0024990	170	Selby	Atherton	Selby Lane Elementary School
Atherton	3090	FA0002709	50	Valparaiso	Atherton	Menlo School
Atherton	3090	FA0024994	32	Almendral	Atherton	Fire Station #3
Atherton	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.

<input checked="" type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges as one enforcement action.
<input type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.

	Number	Percent
Total number of inspections conducted (C.4.d.iii.(2)(a))	15	
Number of enforcement actions or discrete number of potential and actual discharges	1	
Violations Enforcement actions or discrete 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))	1	100%
Comments: n/a		

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) ⁵¹	Number of Enforcement Actions Taken
Level 1	Verbal Warning/ Written Notice	1
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		1

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 Category⁵²	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	1
Food (facilities designated by the Permittee 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-filers.

⁵¹Agencies to list specific enforcement actions as defined in their ERPs.

⁵²List 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
Commercial and Industrial Inspections and Illicit Discharge (Complaint) Investigations	1/12/2017	1. Introduction from the Office of Sustainability 2. Municipal Regional Permit (MRP) Changes 3. Regional Board NOV 4. Business Inspection Plan Training Requirements 5. Enforcement Response Plan Training Requirements 6. Changes to the Inspection Report 7. Inspector Questions	29	94%	29	94%
Reissued MRP: What do CEH Inspectors need to know	1/12/2017	See above	29	94%	29	94%
One-on-one Stormwater Training	3/1/2017	Utilization of field-based software, MRP requirements, Inspection basics	1	3%	1	3%
One-on-one Stormwater Training	5/9/2017	Utilization of field-based software, MRP requirements, Inspection basics	1	3%	1	3%
One-on-one Stormwater Training	5/31/2017	Utilization of field-based software, MRP requirements, Inspection basics	1	3%	1	3%
Comments: Town contracts with San Mateo County Environmental Health to conduct commercial 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 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.

Refer to the C.5 Illicit Discharge Detection and Elimination section of the SWCWPPP FY16-17 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 16-17:

No Change.

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

The Town of Atherton received on illicit discharge complaint in FY 16-17 at 400 Walsh Road and is currently working with Tasha at the RWQCB on properly remediating the situation with required permits.

C.5.e.iii.(1) ► Control of Mobile Sources

(a) Provide your agency’s minimum standards and BMPs for various types of mobile businesses (C.5.e.iii.(1)(a))	
The Town of Atherton does not have any mobile businesses. The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) provides a brochure on Best Management Practices for mobile businesses such as: carpet cleaners, vehicle washers, power washers, pet care services, and steam cleaners that might provide services in town.	
(b) Provide your agency’s enforcement strategy for mobile businesses (C.5.e.iii.(1)(b))	
The Town of Atherton does not have any mobile businesses. We will follow our Spill/Discharge Complaint Program (IDDE) and Enforcement Response Plan for any mobile businesses that provide services in town.	
(c) Provide a list and summary of the specific outreach events and education conducted by your agency to the different types of mobile businesses operating within your jurisdiction (C.5.e.iii.(1)(c))	
The Program developed a regional inventory of mobile businesses in the standard BMP categories listed in the “Mobile Businesses – Best Management Practices” brochure. The BMP brochure and a transmittal letter were mailed to the business. The Mobile Cleaner Businesses BMP brochure is posted on the SMCWPPP website. The CII Subcommittee also worked with the PIP Subcommittee to send outreach messages through social media. These activities are discussed in the SMCWPPP FY16-17 Annual Report.	
(d) Provide number of inspections conducted at mobile businesses and/or job sites in 2016-2017 (C.5.e.iii.(1)(d):	0
(e) Discuss enforcement actions taken against mobile businesses in 2016-2017 (C.5.e.iii.(1)(e))	
0	
(f) List below or attach the list of mobile businesses operating within your agency’s jurisdiction (C.5.e.iii.(1)(f))	
The Town of Atherton does not have any mobile businesses. The SMCWPPP maintains a regional inventory of mobile businesses.	
(g) Provide a list and summary of the county-wide or regional activities conducted, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education (C.5.e.iii.(1)(g))	
Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 16-17 Annual Report for description of activities at the countywide or regional level.	

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(3)(a)-(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))
1	2	13	105
Comments: All inspections are for residential single family homes. All sites were inspected during the wet season (unless a permit was finalized within the wet season, at which point inspections for that particular site would cease). 36 non-required single family home inspections, and follow up inspections, were conducted. 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) ⁵³	Number Enforcement Actions Issued
Level 1 ⁵⁴	Verbal Warning to Correct	1
Level 2	Notice of Violation	0
Level 3	Administrative Order	0
Level 4	Administrative Penalty/ Legal Action	0
Total	1	1

⁵³Agencies should list the specific enforcement actions as defined in their ERPs.

⁵⁴For 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.	
<input checked="" type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges as one enforcement action.
<input type="checkbox"/>	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)).	
Total number of enforcement actions or discrete potential and actual discharges for the reporting year	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 violation occurred, yet a verbal warning was issued and the inspector re-inspected within 10 days to ensure that any violations were corrected. Contractors are educated on site to comply with requirements. Less verbal warnings were issued this year compared to the previous ones.

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. Refer to C.6 Construction Site Control section of the SMCWPPP FY 16-17 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
Stormwater Inspections Workshop: Construction Sites and C.3 Stormwater Controls	Feb 1, 2017	Stormwater regulations, BPM Inspections, Coordination with Caltrans, Control Measure Installation Inspections, Operation and Maintenance Inspections.	2

The SMCWPPP Construction Stormwater Inspector Training was held on February 1, 2017. The agenda, presentations and attendance lists are available on the SMCWPPP webpage: <http://www.flowstobay.org/trainings>

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 16-17 Annual Report for a description of activities conducted at 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

The Town of Atherton held a 2017 Earth Day event, an educational event which included free garden mulch, e-waste safe recycling, secure shredding, eco-friendly 3-D printing, the San Mateo County Bookmobile, earth friendly planting, family friendly experiments, our ever popular Student Challenge, and much more was held on April 22, 2017 in the Town Center by Ashfield Road and Dinkelspiel Lane. A Master Gardener held a symposium for the community. Outreach for the event included town wide mailing, banner at a busy intersection, email blast, publications on the town's and the library's websites, and other signage. Over 100 people attended the event, all vendors and speakers noted the attendance. All feedback received verbally and in writing was positive. **See the C.7 Public Outreach and Citizen Involvement Events section of SMCWPPP FY 16-17 Annual Report for a summary of activities.**

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 16-17 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 16-17 Annual Report for a summary of activities.”

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
The Town of Atherton’s aforementioned Earth Day event involved school children ages K-12.	eco-friendly 3-D printing, the San Mateo County Bookmobile, earth friendly planting, kid friendly sustainable science experiments	dozens	The various family friendly events have been noted as one of the most effective components of the event.

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?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No			
	If no, explain: N/a					
	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. Starting FY 16-17, Permittees are required to report the total quantity of the active ingredient used, not the total quantity of product used.					
	Trends in Quantities and Types of Pesticide Active Ingredients Used ⁵⁵					
Pesticide Category and Specific Pesticide Active Ingredient Used	Amount ⁵⁶					
	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	FY 21-22
Organophosphates						
Active Ingredient Chlorpyrifos	0					
Active Ingredient Diazinon	0					
Active Ingredient Malathion	0					
Pyrethroids (see footnote #56 for list of active ingredients)						
Active Ingredient Deltamethrin	0.005					
Active Ingredient Lambda-Cyhalothrin	0.08					
Carbamates						
Active Ingredient Carbaryl	0					
Active Ingredient Aldicarb	0					
Fipronil	0					

⁵⁵Includes all municipal structural and landscape pesticide usage by employees and contractors.

⁵⁶Weight 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.

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						
Active Ingredient Chlorantraniliprole		0					
Active Ingredient Cyantraniliprole		0					
<p>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.</p> <ul style="list-style-type: none"> • Biological control <p>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.</p> <ul style="list-style-type: none"> • Cultural controls <p>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.</p> <ul style="list-style-type: none"> • Mechanical and physical controls <p>Mechanical and physical controls kill a pest directly or make the environment unsuitable for it. Traps for rodents are examples of mechanical control. However, the preferred method of gopher control used by MCE Corporation is the use of H & M Gopher. H&M pressurized exhaust (carbon monoxide) controls. In the event this method is ineffective, other types of controls are used to control underground rodents.</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.	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?	<input checked="" type="checkbox"/>	Yes	No
If yes, did your municipality evaluate the contractor’s list of pesticides and amounts of active ingredients used?	<input checked="" type="checkbox"/>	Yes	No,
If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored In response to the water boards comments on our FY 15-16 Annual Report, we would like to clarify our control over our contractors implementation of IPM techniques. 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 Pacheco Brothers. Documentation of the company’s qualifications are included as Attachment 9-1. Also included is the Summary of Pesticide Training Procedures for Pacheco Brothers, which included Integrated Pest Management Practices. 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.			

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 type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
<p>If yes, summarize the communication. If no, explain. See Section 9 of the SMCWPPP FY 16-17 Annual Report for summary of communication with the San Mateo County Agricultural Commissioner</p>			
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 type="checkbox"/>	Yes	<input checked="" type="checkbox"/> No
<p>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.</p>			

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.
See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 16-17 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.
See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 16-17 Annual Report for a summary of public 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:

Permittee Name: Town of Atherton

See the C.9 Pesticides Toxicity Control section of SMCWPPP FY 16-17 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.

Summary:

During FY 16-17, we participated in regulatory processes related to pesticides through contributions to the Program, 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 70% mandatory trash load reduction deadline was attained. If not attained, attach and include reference to a Plan to comply with the deadline in a timely manner, which should include the Permittee’s plan and schedule to install full capture systems/devices.

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) ⁵⁷	80.4%
Percent Trash Reduction due to Jurisdictional-wide Source Control Actions (as reported in C.10.b.iv) ¹	NA
SubTotal for Above Actions	80.4%
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 in FY 16-17	80.4%

Discussion of Trash Load Reduction Calculation and Attainment of the 70% Mandatory Deadline:
 The Town attained and reported a 75% trash load reduction in its FY 15-16 Annual Report, exceeding the non-mandatory performance guideline of 60% by July 1, 2016. In FY 16-17 the Town has attained an 80% trash load reduction (including trash offsets), exceeding the mandatory trash load reduction requirement of 70% by July 1, 2017. Descriptions of the actions taken to reduce trash in the City are summarized in this section of the annual report. Methods used to calculate the reduction are consistent with the methods described in the MRP

⁵⁷ See Appendix 10-1 for changes in trash levels by TMA between 2009 and FY 16-17.

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 16-17, during FY 16-17, 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 16-17		
The Town of Atherton has no Full Capture Devices	NA*	NA*
Installed in FY 16-17		
The Town of Atherton has no Full Capture Devices	NA*	NA*
Total for all Systems Installed To-date		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 16-17 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 16-17 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.

The Town of Atherton has no Full Capture Systems.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or >50% full in FY 16-17	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 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 16-17 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 ⁵⁸ Available for Assessment	Summary of On-land Visual Assessments ⁵⁹			Jurisdictional-wide Reduction (%)
		Street Miles Assessed	% of Applicable Street Miles Assessed	Ave. # of Assessments Conducted at Each Site ⁶⁰	
1	1.83	0.41	22.21%	6.0	69.27%
2	0.27	0.20	74.05%	6.0	0.2%
3	0.13	0.13	100.00%	6.0	10.5%
4*	0.00	NA	NA	NA	NA
Total		0.74	-	-	80.4%

* TMA 4 is entire low trash generating.

⁵⁸ Linear feet are defined as the street length and do not include street median curbs.

⁵⁹ Assessments conducted between July 2015 and July 2017 are assumed to be representative of trash levels in FY 16-17 and were therefore used to calculate the jurisdictional-wide reductions reported in this section.

⁶⁰ Each assessment site is roughly 1,000 feet in length

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.c. ► Trash Hot Spot Cleanups

Provide the FY 16-17 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 16-17.

Trash Hot Spot	New Site in FY 16-17 (Y/N)	FY 16-17 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
ATH01Middlefield/Marsh	N		0.5	0.3	0.2	0.2	0.0

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

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C.10 Trash Load Reduction

Permittee Name: Town of Atherton

surrounding these parcels remain as jurisdictional on the Town's baseline trash generation maps. The Town's revised baseline trash generation map was included as Appendix 10-2 in the FY 15-16 Annual Report.	
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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 16-17. 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 16-17	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 16-17.

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 16-17 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 16-17 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	153	0	0	154	0	153	0	0	154	0%	126	28	0	0	154	69.7%	69.7%
2	0	4	0	0	4	0	4	0	0	4	0%	0	3	0	0	4	0.2%	0.2%
3	0	23	0	0	23	0	23	0	0	23	0%	19	4	0	0	23	10.5%	10.5%
4	2,968	0	0	0	2,968	2,968	0	0	0	2,968	0%	2,968	0	0	0	2,968	0%	0%
Totals	2,968	180	0	0	3,148	2,968	180	0	0	3,148	0%	3,113	35	0	0	3,148	80.4%	80.4%

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 Program's FY 2016-17 Annual Report for:

- 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 Methodology⁶¹ 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); and
- Supporting data and information necessary to substantiate the load reduction estimates."

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

If the regional or countywide mercury load reductions required by this sub-provision via Green Infrastructure by the end of the permit term are not met, will Permittees in your county use the default population-based method to calculate the portion of the countywide load reduction required of each Permittee?

X	Yes		No
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C.11.e. ► Implement a Risk Reduction Program

A summary of Program and regional accomplishments for this sub-provision are included in the C.11 Mercury Controls section of the Program's FY 2016-17 Annual Report and/or a BASMAA regional report.

⁶¹BASMAA 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 Program's FY 2016-17 Annual Report for:

- Documentation of PCBs 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 Methodology⁶² was used to calculate the PCBs load reduced by each control measure implemented in our agency's jurisdictional area and the calculation results (i.e., the estimated PCBs load reduced by each control measure); and
- Supporting data and information necessary to substantiate the load reduction estimates.

If the regional and countywide PCBs load reductions required by C.12.a are not met, will Permittees in your county use the default population-based method to calculate the portion of the countywide load reduction required of each Permittee?	X	Yes		No
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⁶²BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.0. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., September 19, 2016.

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

A summary of Program and regional accomplishments for this sub-provision is included in the C.12 PCBs Controls section of Program's FY 2016-17 Annual Report and/or a BASMAA regional report.

Does your agency plan to seek exemption from this requirement?

Yes

No

Guidance: If the above answer is **No** then further information need not be provided here.

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

A summary of Program and regional accomplishments for this sub-provision are included in the C.12 PCBs Controls section of the Program's FY 2016-17 Annual Report and/or a BASMAA regional report.

C.12.h. ► Implement a Risk Reduction Program

A summary of Program and regional accomplishments for this sub-provision are included in the C.12 PCBs Controls section of the Program's FY 2016-17 Annual Report and/or a BASMAA regional report.

Section 13 - Provision C.13 Copper Controls

C.13.a.iii. ► 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. ► 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.

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.

See Section C.7 of SMCWPPP's FY 16-17 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)