



**Municipal Regional Permit
National Pollution Discharge Elimination System
City of East Palo Alto
ANNUAL REPORT
Fiscal Year 2018-2019
July 1, 2018-June 30, 2019**



City of East Palo Alto

Office of the City Manager

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: **CITY OF EAST PALO ALTO**

FY 2018/19 Annual Report

Dear Mr. Montgomery,

This letter and Annual Report with attachments is submitted by the City of East Palo Alto, 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. Included is a summary of the comprehensive solutions the City developed and implemented to address urgent public health risks associated with illicit discharges related to drastic increases in unhoused residents who transitioned into alternative housing arrangements lacking in essential sanitation services. A schedule to return to compliance is included for development of a Green Infrastructure Plan, currently budgeted and prioritized in the City's Capital Improvement Plan and reprioritized for completion in FY 2019/20. The City requires "no missed opportunities" for Green Infrastructure on projects making modifications to the public right-of-way.

Please contact Michelle Daher at 650-665-0482 or mdaher@cityofepa.org regarding any questions or concerns.

Very truly yours,



Jaime M. Fontes
City Manager

**CITY OF EAST PALO ALTO
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:

 _____ 
Jaime M. Fontes Date
City Manager

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Section 1 – Permittee Information

Background Information				
Permittee Name:	City of East Palo Alto			
Population:	30,500			
NPDES Permit No.:	CAS612008			
Order Number:	R2-2015-0049			
Reporting Time Period (month/year):	July 2018 through June 2019			
Name of the Responsible Authority:	Jaime M. Fontes	Title:	City Manager	
Mailing Address:	2415 University Avenue			
City:	East Palo Alto	Zip Code:	94303	County: San Mateo
Telephone Number:	650-853-3100	Fax Number:		
E-mail Address:	jfontes@cityofepa.org			
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle M. Daher	Title:	Management Analyst, Environmental Programs	
Department:	Community and Economic Development			
Mailing Address:	1960 Tate Street			
City:	East Palo	Zip Code:	94303	County: San Mateo
Telephone Number:	(650) 665-0482	Fax Number:		
E-mail Address:	mdaher@cityofepa.org			

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

During FY 18-19, the City of EPA focused on addressing maintenance for new CIP projects including a new pedestrian overcrossing and a new full trash capture device that is within an outfall apron of the San Francisquito Creek. Maintenance activities also included updating the City's vehicle retirement program to remove inoperable vehicles from the City's maintenance yard.

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.

X	Control of debris and waste materials during road and parking lot installation, repaving or repair maintenance activities from polluting stormwater
X	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.
X	Sweeping and/or vacuuming and other dry methods to remove debris, concrete, or sediment residues from work sites upon completion of work.

Comments:

The City of East Palo Alto typically contracts out roadway repairs and maintenance beyond cold-patch or emergency pothole repair. The City uses vacuum methods for collection of discharge slurry when saw cutting concrete for maintenance of sidewalks, typically when tree root uplift occurs.

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.

- | | |
|----------|---|
| X | 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 |
| X | Implementation of the BASMAA Mobile Surface Cleaner Program BMPs |

Comments:
The City of East Palo Alto does not typically wash pavement or pressure wash hardscape surfaces unless discharging to a landscaped area. BASMAA mobile surface cleaning training is provided to maintenance staff.

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.

- | | |
|----------|--|
| X | Control of discharges from bridge and structural maintenance activities directly over water or into storm drains |
| X | Control of discharges from graffiti removal activities |
| X | Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities |
| X | Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal |
| X | Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities. |
| X | Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities. |

Comments:
The City's CIP included a new Pedestrian Overcrossing over highway 101 as well as a new full trash capture device within the San Francisquito Creek outfall apron, both of which required updating the City's maintenance protocols for graffiti abatement.

C.2.e. ► Rural Public Works Construction and Maintenance	
Does your municipality own/maintain rural ¹ roads:	<input type="checkbox"/> Yes <input checked="" 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"/>	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
<input type="checkbox"/>	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
<input type="checkbox"/>	No impact to creek functions including migratory fish passage during construction of roads and culverts
<input type="checkbox"/>	Inspection of rural roads for structural integrity and prevention of impact on water quality
<input type="checkbox"/>	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
<input type="checkbox"/>	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
<input type="checkbox"/>	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings
Comments including listing increased maintenance in priority areas:	

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

C.2.f. ► Corporation Yard BMP Implementation				
Place an X in the boxes below that apply to your corporations yard(s):				
<input type="checkbox"/>	We do not have a corporation yard			
<input type="checkbox"/>	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit			
<input checked="" type="checkbox"/>	We have a Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s)			
Place an X in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:				
<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment			
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system			
<input checked="" type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method			
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used			
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants			
Comments: The City conducted ongoing inspections to ensure there is a vehicle retirement plan for several vehicles that have been discharged from service from the police department. On July 2, 2019, the City Council provided authorization surplus vehicles to be transferred out of City possession.				
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
City of East Palo Alto Maintenance and Public Works Corporation Yard	General housekeeping, vehicle/equipment washing, fuel dispensing of two-stroke landscaping equipment, outdoor material storage, outdoor waste / recycling storage,	8/22/2019	Areas for improvement noted; most notable is removal of HHW by contractor, and removal of non-operational vehicles during FY 18/19 (ongoing issue).	Corrected HHW contract by December 2018. Made progress transfer surplus vehicles 7/2/2019. Ensure transfer to MPFPD.

² Minimum inspection frequency is once a year during September.

	municipal vehicle / heavy equipment parking, employee parking, etc.			
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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. **Due to a water shortage, the City of East Palo Alto halted issuing planning approvals during FY 17/18. In July 2017, with a water transfers from the cities of Mountain View and Palo Alto, the planning process resumed. Presently, due to capacity issues, infrastructure is in the process of being upgraded to accommodate the anticipated increased water demand. During FY 18/19, a majority of proposed projects were proceeding through the planning process may receive entitlements upon securing confirmation of adequate water pressure and supply to meet the project needs, and other approvals.**

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

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
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Comments (optional): **The City of East Palo Alto has not detailed an avenue for alternative compliance but reserves the right to do so in the future. The City is considering potential for GI expansion near project encroachment areas, as potential for alternative compliance when a project is unable to provide LID for projects with intensified use, providing low income housing. This will be further detailed in the City's forthcoming GI Plan.**

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)?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	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.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	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.
It is the City's desire that the Water Board consider expansion of the Special Projects definition to consider projects that are providing low income housing at densities of 50 dwelling units per acre, with the caveat that the project expands GI near the project site, where possible, as a discretionary option for agencies to authorize. Most sites considering low income housing are in-fill sites which attempt to maximize housing for low-income individuals, with modest parking allocation and primarily treating rooftops and sidewalk impervious surfaces.

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

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

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

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

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)	14
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)	14
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)	3
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 18-19)	21.4%

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:

Self-inspection by owners/operators of treatment has not been accepted for municipal O&M verification inspections except for vault based systems. Inspections have been conducted by City staff.

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: Small, single family home subdivisions that lack a site groundskeeper have been the most challenging to obtain consistent maintenance, as have older bioretention areas that are not part of a larger project. The City is actively working with site owners to ensure previously installed SWTMs obtain recorded O&M Agreements for the ongoing inspection authority for these sites.

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 finding that most projects implement many/most, voluntarily.

C.3.j.i.(5).(b) ► Green Infrastructure Plan			
(For FY 2018-19 Annual Report only) Did your agency complete a Green Infrastructure Plan?	<input type="checkbox"/>	Yes, see attached Green Infrastructure Plan	<input checked="" type="checkbox"/> No
If No, provide schedule for completion: The City of East Palo Alto was distracted by the prioritization of inspections of RV encampments and other homeless encampments throughout FY 17/18 and continuing into FY 18/19. These issues took prioritization due to the significance of potential health/safety as well as environmental degradation that was ongoing until the crisis was largely averted at the beginning of FY 19/20. The effort required many contracts and ordinance changes for the community which resulted in a re-prioritization of GI for FY 19/20. The City anticipates preparation of the Green Infrastructure Plan by June 2020, with a high likelihood that this will be approved by the City Council by Spring 2020 as much of the preparation is underway.			

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?	<input checked="" type="checkbox"/>	Yes, see attached documents or links provided below	<input type="checkbox"/> No

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

The City of East Palo Alto 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 , general legal authority to implement the GI Plan. Adoption/ acceptance of the GI Plan by the City Council will further strengthen this authority, at which time, expansion of Ch. 13.12.050 to include GI specifically is warranted.

Descriptions of and links to documents demonstrating legal authority will be provided upon finalization.

If No, provide schedule for completion:

13.12.050 - Construction and application.

This chapter shall be construed to assure consistency with the requirements of the federal Clean Water Act, as amended or supplemented, applicable implementing regulations and whatever is the most current NPDES permit applicable to the city.

(Ord. No. 377, § 1(Exh. 1), 5-6-2014)

13.12.107 - Stormwater management plan requirements.

Whenever submission of a stormwater management plan or a revised stormwater management plan is required pursuant to this chapter, any authorized enforcement staff may use the CASQA Stormwater BMP Handbook to assess the adequacy of the proposed plan. (Ord. No. 377, § 1(Exh. 1), 5-6-2014)

(Ord. No. 377, § 1(Exh. 1), 5-6-2014)

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:

The City of East Palo Alto has included staff training during interdepartmental meetings and discussions about each project. The City Council has been informed about the impending GI Plan during the CIP budget process. Funding has been provided to prepare the plan. Project-by-project the City has informed each developer of the "no missed opportunity" requirements to updated streetscape along each project that is going through pre-planning and planning approvals. Projects are incorporating GI with improvements of streetscape when encroachment occurs.

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:

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.

Each regulated project going through pre-development review and/or planning review which requires an encroachment permit that involves streetscape modifications is required to consider green infrastructure from a “no missed opportunity” standpoint, to determine whether the public right of way can accommodate GI treatment. Projects that determine that GI is infeasible are required to prove to the City the rationale as to the determination. Typically, some measure of GI is determined feasible, while not 100% treatment for the entire frontage of the project site. For larger projects that are not in-fill projects (increasing existing density), public right of way is being required to be dedicated for GI, such as in the Ravenswood Specific Plan Area for the Ravenswood Business District (RBD) in the north-eastern “old industrial” area of the City. The RBD area has enhanced stormwater requirements to ensure appropriate build-out to meet future standards and reduce pollution potential. The RBD is a major potential for GI buildout.

Summary of Planning or Implementation Status of Identified Projects:

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

C.3.j.iii.(2) 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.

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 wasteload 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 ¹ , Street Address	Name of Developer	Project Phase No. ²	Project Type & Description ³	Project Watershed ⁴	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ⁵	Total Replaced Impervious Surface Area (ft ²) ⁶	Total Pre- Project Impervious Surface Area ⁷ (ft ²)	Total Post- Project Impervious Surface Area ⁸ (ft ²)
Private Projects											
EPACenter Arts East Palo Alto Youth Arts & Music Center, WDID #2 41C380590	1950 Bay Road	East Palo Alto Youth Arts & Music Center via Overaa Construction	None	Building/performing arts center with indoor and outdoor amenities	San Francisquito Creek	1.94	1.47	40,768	20,653	20,653	61,421
Public Projects											
NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Comments:											

¹Include cross streets

²If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

³Project 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.

⁴State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

⁵All impervious surfaces added to any area of the site that was previously existing pervious surface.

⁶All impervious surfaces added to any area of the site that was previously existing impervious surface.

⁷For redevelopment projects, state the pre-project impervious surface area.

⁸For 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 ⁹	Application Final Approval Date ¹⁰	Source Control Measures ¹¹	Site Design Measures ¹²	Treatment Systems Approved ¹³	Type of Operation & Maintenance Responsibility Mechanism ¹⁴	Hydraulic Sizing Criteria ¹⁵	Alternative Compliance Measures ^{16/17}	Alternative Certification ¹⁸	HM Controls ^{19/20}
Private Projects										
East Palo Alto Youth Arts & Music Center	October 11, 2019		Fire refuse areas, floor drains directed to ng	Minimize impervious surfaces Impervious surfaces directed to cisterns, landscapin g, .	Bioretention areas and flow-through planters, (tree well filters & bioretention areas for GI in public right of way)	O&M Agreement between site owner and Agency (prior to occupancy)	Combin ation	None	None	None

⁹For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.

¹⁰For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.

¹¹List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

¹²List 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.

¹³List 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.).

¹⁴List 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.

¹⁵See 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).

¹⁶For 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.

¹⁷For 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.

¹⁸Note whether a third party was used to certify the project design complies with Provision C.3.d.

¹⁹If HM control is not required, state why not.

²⁰If 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).

landscapi

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

Project Name	Approval Date ²¹	Date Construction Scheduled to Begin	Source Control Measures ²²	Site Design Measures ²³	Treatment Systems Approved ²⁴	Operation & Maintenance Responsibility Mechanism ²⁵	Hydraulic Sizing Criteria ²⁶	Alternative Compliance Measures ^{27/28}	Alternative Certification ²⁹	HM Controls ^{30/31}
Public Projects										
NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Comments: Projects for Green Infrastructure are planned for FY 19/20, pending full design and approval.										

²¹For public projects, enter the plans and specifications approval date.

²²List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²³List 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.

²⁴List 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.).

²⁵List 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.

²⁶See 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).

²⁷For 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.

²⁸For 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.

²⁹Note whether a third party was used to certify the project design complies with Provision C.3.d.

³⁰If HM control is not required, state why not.

³¹If 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).

Permittee Name: _____

C.3.h.v.(2). ► Table of Newly Installed³² Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

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

Name of Facility	Address of Facility	Party Responsible ³³ For Maintenance	Type of Treatment/HM Control(s)
NONE	NONE	NONE	NONE

³² "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

³³State 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 Date³⁴	Status³⁵	Description³⁶	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category³⁷	LID Treatment Reduction Credit Available³⁸	List of LID Stormwater Treatment Systems³⁹	List of Non-LID Stormwater Treatment Systems⁴⁰
NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE

Special Projects Narrative **NONE**

³⁴Date that a planning application for the Special Project was submitted.

³⁵ 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.

³⁶Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

³⁷ For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

³⁸For 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.

³⁹: 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.

⁴⁰List 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.

C.3.j.ii.(2) ► Table A - Public Projects Reviewed for Green Infrastructure				
Project Name and Location⁴¹	Project Description	Status⁴²	GI Included?⁴³	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement⁴⁴
Bay Road Phase II	Installation of new storm drain to accommodate the 10-yr storm event, other utilities, roadway reconstruction, bike lanes	Fully funded, Fully designed, ready RFP released, reviewing proposals. Expected to begin construction FY 19/20	Yes, where possible	Tree well filters where feasible; many areas of tight public right of way constraints, attempting to provide amenities for complete streets; future development project dedication for enhanced GI anticipated.
Addison Avenue Safe Routes to School	Add sidewalks, and other complete street amenities; stormdrain system incomplete in this area.	In design, fully funded.	Yes	Likely tree well filters and bioretention cells.

⁴¹ List each public project that is going through your agency's process for identifying projects with green infrastructure potential.

⁴² Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.

⁴³ 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.

⁴⁴ 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.

C.3.j.ii.(2) ► Table B - Planned and/or Completed Green Infrastructure Projects			
Project Name and Location ⁴⁵	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Bay Road Phase II	See above	See above	See above
Addison Avenue	See Above	See Above	See Above

⁴⁵ List each planned (and expected to be funded) public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. Note that funding for green infrastructure components may be anticipated but is not guaranteed to be available or sufficient.

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

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

During this reporting year, the City: 1) updated enforcement response plans, business inspection plans, facilities lists, and inspection frequencies and priorities; 2) conducted inspections; 3) conducted training; and 4) participating in the SMCWPPP CII Subcommittee. 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. During FY 19/20 city staff will focus inspections on those businesses that required some level of enforcement, and work on a variety of fronts to ensure litter abatement and solid waste management is adequate as well as BMPs to eliminate pollution potential, due to the large number of actual discharges noted in FY 18/19. Staff will also prioritize identifying locations of potential nurseries not currently registered under the City's business license program, and ensure they are appropriately licensed, and conduct inspections. Many of the nurseries in EPA are on flag lots behind gates, and may require planned access/ scheduled inspections. Staff will also focus on home based businesses gain compliance through similar methodologies.

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.

	BusinessAddress	BusinessName	Date of last inspection	Inspec. Type	Prior enforcement level
1	1745 E. Bayshore	Starbucks	4/9/2019	Business	Verbal
2	1765 E. bayshore	Wingstop	4/9/2019	Business	Verbal
3	1731 E. Bayshore	Cardenas	4/9/2019	Business	Verbal
		Togo's/Basking			
4	E. Bayshore	Robins	4/9/2019	Business	Verbal
5	2508 University	American Water	4/15/2019	Business	Verbal
6	1731 E. Bayshore	Cardenas	4/18/2019	Business	Verbal
7	560 Bell St	EPA Senior Center	5/8/2019	Business	Verbal
8	550 Bell St	YMCA	5/8/2019	Business	Verbal
9	2220 A University	3 Brothers Tacos	5/29/2019	Business	Verbal

10	2220 B University	Izzy's Brooklyn Bagels	5/15/2019	Business	Verbal
		Emanuel Pizza and			
11	1489 E. Bayshore	Bakery	5/17/2019	Business	Verbal
12	1491 E. Bayshore	Temos Tacos	5/17/2019	Business	Verbal
13	1933 Pulgas	Garden Supermarket	5/29/2019	Business	Verbal
14	2194 University	Shell Gas Station	5/29/2019	Business	Verbal
15	2101 University	Chevron	5/29/2019	Business	Verbal
		Tacos Toluco (Mi			
16	2150 University	Pueblito)	5/29/2019	Business	Verbal
17	1751 East Bayshore Rd	PGA Superstore	6/20/2019	Business	Verbal
		Cesar Chavez			
18	2350 Ralmar Ave	Academy	6/4/2019	Business	Verbal
		Ravenswoods Middle			
19	2350 Ralmar Ave	School	6/4/2019	Business	Verbal
		Edison Brentwood			
20	2086 Clarke Ave	School	6/4/2019	Business	Verbal
21	1731 Bayshore Rd	Cardenas	6/30/2019	Business	Warning
		Los Robles McNair			
22	2033 Pulgas Ave	Academy	6/19/2019	Business	Verbal
23	1731 E. Bayshore	Cardenas	6/19/2019	Business	Admin Action
24	1761 E. Bayshore	Office Dept	6/20/2019	Business	Verbal
25	1765 E. Bayshore	Jamba Juice	6/20/2019	Business	Verbal
26	1731 E. Bayshore	Cardenas	6/24/2019	Business	Admin Action
27	1771 E. Bayshore	Nordstrom Rack	6/25/2019	Business	Verbal
28	1765 E. Bayshore	Wingstop	6/25/2019	Business	Warning
29	1441 E. Bayshore Rd	Charles Market	6/26/2019	Business	Warning
30	1441 E. Bayshore Rd	Bonnie Duplessis	6/26/2019	Business	Verbal

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C.4 – Industrial and Commercial Site Controls

Permittee Name: CITY OF EAST PALO ALTO

31	2368 Clarke Ave	Eastside Market	6/27/2019	Business	Verbal
32	2235 Cooley Ave	Cooley Market	6/27/2019	Business	Verbal
33	1731 East Bayshore	Cardenas	7/31/2019	Business	Verbal
34	1731 East Bayshore	Cardenas Mkt	8/19/2019	Business	Warning
35	2480 Pulgas	EPA Arts	8/22/2019	Business	Verbal
		National Const.			
36	San Leandro	Rentals	8/20/2019	Business	Verbal
37	2390 Clarke Ave	La Cazuela	10/1/2018	Business	Admin Action
38	2390 Clarke Ave	La Cazuela	8/28/2018	Business	Admin Action
		Silvers			
39	801 E Bayshore	Warehouse/Mancave	8/22/2018	Business	Verbal
40	2220 University	Izzy's Bagels	8/17/2018	Business	Admin Action
41	1404 Camellia Dr	TNP Real Estate	8/16/2018	Business	Warning
42	1765 E Bayshore	Wing Stop	8/13/2019	Business	Warning
43	1731 E. Bayshore	Cardenas	8/13/2018	Business	Warning
44	2091 Bay Rd	Infiniti Auto Wreckers	7/19/2018	Business	Warning
45	463 Larkspur	Jose Rivera	7/15/2018	Business	Admin Action
46	2160 University	Auto Zone #3302	7/12/2018	Business	Verbal
47	2220 University	Izzy's Bagels	7/26/2018	Business	Admin Action
48	2220 University	Three Brothers Taco	7/26/2018	Business	Admin Action
49	2160 University	Auto Zone #3302	7/9/2018	Business	Warning
50	1923 Bay Rd	Melvin Curtaccio	7/5/2018	Business	Verbal
51	1905 E. Bayshore	Recology	6/17/2019	Business	Admin Action
52	1905 E. Bayshore	Valley Fleet Clean	6/17/2019	Business	Admin Action
53	2263 University Ave	Sue Lee	6/10/2019	Business	Verbal

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 at a site as one enforcement action.
<input type="checkbox"/>	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))	70
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))	9

Comments:
All inspections were resolved in a timely manner. Due to the high incidence of non-compliant, 74%, with many requiring follow-up efforts and escalating enforcement. In FY 19/20, the city will have a campaign that focuses on 100% compliance, targeting the very same businesses that were noted with verbal, warning or admin citations due to the lack of consistency in BMP implementation being seen. We will also seek out several nurseries that have been mentioned as continuing operations without the benefit of permitting, as we want to observe the management of their fertilizers and/or pesticides and other potential runoff issues. The Home Depot will likely be added to this list along with sites that are showing up as landscaping storage for commercial landscaping companies.

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	16
Level 2	Warning Notice	12
Level 3	Admin. Action and/or Cost Recovery	11
Level 4	Legal Action	10
Total		72

¹Agencies to list specific enforcement actions as defined in their ERPs.

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
Automotive (may be home based)		3
Mobile Business/Home Based (not automotive)	2	2
Light Industrial		2
Food, Health, Restaurant or Market	6	5

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:

No businesses were identified as General Permit non-filers during FY 18/19.

²List 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
In-House CII Training	Year Round	Industry specific on-the-job training for inspections related to businesses that may result in water quality impairment.	2	100%	2	2
CACEO California Assoc. of Code Enforcement Officers	2/8/2019	PC 832 Laws of Arrest	1	50%	1	1
American Red Cross	2/19/2019	Emergency Shelter Fundamentals	2	100%	2	2
Tetra Tech Post Disaster Programs	3/6/2019	Debris Management and Post Disaster Workshop	2	100%	2	2
PIP Meeting	3/19/2019	Pollution Prevention Program	2	100%	2	2
BASMAA Bay Area Stormwater Management Agencies Assoc.	3/21/2019	Recognized Surface Cleaner	2	100%	2	2
Recology/Rethink Waste	3/27/2019	Turning the ship Around Tour Plastics Recycling	2	100%	2	2
ASI American Stormwater Institute	4/10/2019-4/11/2019	MS4 Stormwater Inspector Qualified Stormwater Inspector	1	50%	1	1
CACEO California Assoc. of Code Enforcement Officers	4/25/2019	Intro to Planning and Zoning	1	50%	1	1
HHW Collaborative	5/2/2019	Household Waste Hazmat Class	2	100%	2	2
Recology/Rethink Waste	6/19/2019	General Recycling Tour	2	100%	2	2

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:

During FY 18/19, the City continued to see public complaints for illicit discharges due in part to the following reasons:

1. Ongoing housing crisis reflected by people continuing to rely on the use of Recreational Vehicles in the public right of way for alternative housing. These vehicles lack sanitation services;
2. Increased public outreach regarding the illegal activities of illegal dumping and illicit discharges with increased numbers of City banners and door-tag placement throughout the community in areas prone to discharges indicating that illicit discharges and illegal dumping of unwanted items is forbidden;
3. New staff hired (again) and trained to identify illicit dumping and further trained to conduct code enforcement in cases of escalated enforcement requirements.
4. Participated in the Countywide Program's CII Subcommittee; and
5. Worked with the executive team to revise staffing position classifications to align with the City's increased stormwater enforcement processing needs.

Item #1.

Well over half of the City's environmental program/NPDES/Solid waste management efforts for FY 18-19 were focused on the prioritization of addressing the effects of the housing crisis which was most evident through the transition of residents into RVs. The City spent tremendous resources and time to address the issue due to the effects some of the RVs were associated with creating non-point-source illicit discharges of human waste (sewage) beginning in June 2017 as indicated through weekly city inspections. Public health concerns were identified during a November 13, 2017 inspection, two days prior to an impending significant storm event. During that time, the growing RV community was subjected to non-point-source sewage discharges on a single public street, the 1200 block of Weeks Street.

The area of concern has three stormdrain inlets, with a closed stormdrain system that prevents actual discharge to the Waters-of-the State. Within this blocked system, over 6,000 gallons of liquid sewage and roughly the same amount of solids had been identified as discharged directly into the stormdrain system without surface point-source evidence, until

November 13, 2017, when the material visibly observed within the stormdrain catch basins. Once an inspection confirmed the illicit discharge, the street was closed within 12 hours; RVs were asked to move to an alternative area, and the material was pumped directly into the sewer system prior to an impending storm. Solids were suspended and mobilized with water and subsequently discharged directly to the sanitary sewer. The street and sidewalk surface was then treated with enzymes and closed until the enzyme action was finalized.

Due to the lack of advance notification to the RV occupants, who were given 12 hours to move their vehicles 200 feet out of the zone of concern, major news reports indicated the City was evicting the RV occupants from the City. This misinformation generated tremendous media interest and required public city response.

<https://www.theguardian.com/us-news/2017/nov/15/california-homeless-evictions-school>

The City Council acted, temporarily closing this street segment for the winter months due to ongoing flooding concerns as the street segment is subject to localized flooding. The likelihood of public health concerns was also thereby addressed, preventing the area re-open to RVs. Daily inspections commenced in November 2017 to ensure the RV community had adequate information about proper discharge and solid waste sanitation services.

Between June 2017 and May 2018, the City lacked a contract for towing RVs. The City's tow rotation includes small towing companies with small lots, each declining to provide this service due to the cost of storing the vehicles and when unclaimed, disposing of the vehicles which includes biohazardous and hazardous waste along with tremendous solid waste generated from RVs. With an informal survey, staff identified that availability of RV towing facilities was non-existent; no tow company indicated verbal commitment to provide this service in East Palo Alto from as distant as Eureka to Sacramento, and Gilroy. The City continued seeking towing services through April 2019, when a tip led to the potential for a service contract with one tow provider who was already providing this service for select agencies in the Bay Area. The City entered into contract with this company in May 2018.

During the course of investigating matters related to people turning to RVs as alternatives to housing in East Palo Alto, the City determined that it is common practice (about half the time) that RV ownership transfers occur without the benefit of title change with DMV, and in many cases there is no trace of registration, no license plates, and roughly half of the vehicles were non-operational; in addition, many of the people staying inside RVs expressed they did not have a driver's license.

At the peak of the RV crisis in East Palo Alto (roughly December 2018), RVs were being towed into the city, often during the cover of night, and parked on public roadways with families or even company workers living inside non-operational vehicles. The vehicle owners, or those with “possession” by keeping the keys to the vehicle, were often charging high amounts of rent to each occupant to residing in the vehicle. In at least three verified instances on East Palo Alto roadways, the vehicle owner purposely tampered with plumbing to enable the vehicle to directly discharge black- and grey-water onto roadways to enable the ease of functioning plumbing without the hassle of towing or driving the vehicle to an RV discharge facility or appropriate dumping site.

Starting in November 2017, City inspectors conducted daily inspections throughout the City. Staff noted up to 58 RVs present and tracked license plate data and ensured each day, each RV was inspected/observed for containment. The City set a goal of zero actual or potential discharges from RVs between the months of July 1, 2018 through May 1, 2019, the date the RV Safe Parking Pilot Program was expected to commence. The City performed roughly 2,013 visual observations during that time. These inspections resulted in warning notices and administrative discharges due to ongoing holding tank tampering, physical break down of the vehicles' self-containment.

The City also provided over 500 notifications as to proper disposal, along with hundreds of conversations with the occupants of the vehicles and vehicle owners, in attempt to understand the complexity of the crisis. When vehicles were found to be discharging greywater, minor administrative citations were given; and when discharging blackwater, administrative citations were set at \$1,000 per day, per violation with the requirement that the vehicle is taken immediately to a certified repair facility. The occupant was also offered the option of having the administrative citation waved in exchange for voluntarily giving up the vehicle and allowing the City to have the towing contractor remove the vehicle. Most of the time, vehicles were voluntarily given up. Only once the vehicle was taken to a certified repair facility to have the holding tank replaced and the City was sent a photo of the receipt for \$1,500, the cost of the repair, to confirm the repairs had taken place. Due to the complexity of ownerships of the RVs, most of those vehicles towed were destroyed and paid for by the City; cost recovery is not anticipated due to the lack of traceable registration.

After the commencement of the RVSPPP, the City continued to perform daily inspections for all RVs though 16 of the vehicles were parked in the safe parking facility overnight with stipulations for appropriate sanitation. Between May 2019 and June 30, 2019, the City saw a gradual reduction in RVs in the city as enforcement began for overnight parking restrictions for those oversized vehicles not part of the RVSPPP. Modest numbers of RVs were towed due to public health hazard conditions, while the city worked in conjunction with homeless service providers to ensure opportunities to find alternative housing arrangements were made.

*Between July 2018 and May 2019, the City Council continued to address the RV community in a comprehensive manner, adopting an Oversized Vehicle Parking Restriction from the hours of 2-5 am, and implemented an RV Safe Parking Pilot Program (RVSPPP) to provide people in RVs with solid waste, sewage services as well as a pathway into permanent housing. The City also expanded towing services and contracts for managing trash piles comingled with sewage and hazardous waste associated with the homeless encampments.

*Between July 2018 and June 2019, the City daily conducted over 5,000 routine visual observations, which were conducted on a daily basis, often multiple times per day. Staff also sampled stormwater puddles and distributed outreach to the RV community to inform them of appropriate sewage and solid waste requirements, and towed RVs when they were deemed a public health hazard when the occupant was unable to move the vehicle to a certified RV repair facility.

*In August 2018, the City Council declared a housing emergency, making way for expanding necessary shelter related services. This also supported creating an RVSPPP to provide a safe place for RVs to park.

*In January 2019, the City conducted several windshield surveys to identify the specific RVs that were parked in the community, which totaled 58. The City observed locations and noted the license plates and descriptions of the vehicles, and photo documented the surrounding area. Beginning in February 2019, with the adoption of an Oversized Vehicle Parking Restriction Ordinance, the City Council concurrently adopted a Deferred Parking Resolution, which enabled those who were already parked in the City to deferred parking, if they participated in the RVSPPP by applying and complying with Program requirements set forth through the Resolution.

RV occupants had 30 days upon the adoption of the combined Resolution/Ordinance to apply for the RVSPPP in order to be "grandfathered in" to be allowed to remain on public streets.

*In May 2019, with the opening of the RVSPPP, RV occupants who applied to participate in the Program were provided with a Certificate from Project WeHOPE, which entitled them to services offered through the City's homeless outreach providers. This Certificate allowed for either participation in the RVSPPP parking facility for those vehicles which were operational, legally registered, insured and where occupants had driver's licenses, OR, if the vehicle was not of legal status, entitled the vehicle to be parked on public roadways for up to 120 days while the owner or occupant attended to outstanding issues to come into full legal compliance. The City included \$35,000 to a homeless assistance fund to

assist with these services (up to \$1,000 maximum per RV), or supportive alternative housing. RVs without a Certificate were forced to leave the City streets or risk being towed.

Throughout the rainy season, intermittent non-point source discharges were associated with the RV encampments and exacerbated with rains, which spread the potential health hazard to impact numerous community members both in the RV community as well as the public at-large.

Stormwater Compliance, Illicit Discharges in FY 18/19

Of the 26 illicit discharges were actual discharges that occurred in East Palo Alto during this FY, 15 of those were from RVs, 58% of the incidence of actual discharges.

No Violations: 1 Report (over 5,000 visual observations)

Verbal: 2 Reports

Warning Notices (potential discharges): 8

Administrative Actions: 7

Legal Action: 8 (this represents the number of vehicles that were towed by the City during this FY due to actual discharge of black-water).

Throughout the rainy season, the City had several roadway sections closed to parking due to confirmed discharges. To protect the public health. Incrementally, much of the City's RV encampment area eventually became subject to parking closures or roadway parking k-rail blockages due to the transient issue of ongoing sewage discharges; or as RVs were moved into the RVSPPP in areas that do not have hardscape surface and saturate the soil or streets with these discharges. The areas that were most widely utilized for RV encampments were Bay Road, Tara Road (a private road), Weeks Street, and a section of Pulgav Avenue, most areas lack stormdrain connections.

By June 30, 2019, out of the original 58 RVs parked along the public right of way, the City noted in an updated survey 14 RVs remained on the public roadways through the RVSPPP deferred parking enforcement. In July 2019, the City Council updated the Deferred Parking Enforcement resolution to eliminate the ability for RVs to be parked in the public right of way without legal or operational status for implementation by August 30, 2019, 120 days after the program began, and only four RVs continued to be non-operational.

At the time of this report, NO RVs are parked on the public right of way in a non-operational status, and all vehicles in

the RVSPPP are parking in the RVSPPP parking facility or at alternative private parking areas. There remain approximately 6 RVs parked throughout the City without the benefit of a Certificate or legally acceptable claim to park on the roadway. The City is providing offers for services to these individuals and require the RVs are removed from the City within 72 hours or risk being towed. As the City finalizes the installation of signage for all City roadways, informing the community that there is an oversized vehicle parking prohibition in effect, the people living in the RVs have taken to selling the RVs and entering permanent housing through Project WeHOPE and partner services.

By prioritizing homeless abatement efforts, the City has become a regionally recognized leader for the comprehensive solutions that have been provided to people experiencing housing crisis. These efforts did not come without cost. The City did not increase staffing levels to accommodate the implementation of this program, but rather re-prioritized efforts based on being required to eliminate discharges that have been identified as a threat to the public health as well as the waters of the state..

While the City did not address all homelessness in the community in FY 18/19, the City did make a tremendous progress to ensure the pollution potential was resolved from oversized vehicles with large sewage holding tanks that were discharging greywater and sewage, which was a priority at that time. The City is continuing a pro-active approach towards addressing the homeless crisis and provide all of our underhoused residents with resources while eliminating the pollution potential.

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))	23
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(2))	23

Discharges resolved in a timely manner (C.5.d.iii.(3))	23
<p>Comments: Guidance: The City had 23 Administrative Citations for violations that reached the stormdrain system, which is considered to be the MS4 (including curb/gutter, street, and/or stormdrain inlets. Of those there were three that could have discharged to the waters of the state, but the sampling did not confirm direct discharge, however all three were considered likely to have occurred overnight and the sampling occurred possibly long after the discharge passed through the outfall being sampled.</p>	

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))
<p>"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 updated but there have been no changes to the BMPs since the 2017 Annual Report.</p> <p>City staff have provided mandatory BASMAA mobile business training for any local business which has been inspected as non-compliant with the BMPs. Businesses have been asked to provide the City with verification that their staff has taken the training.</p>
(b) Provide changes to your agency's enforcement strategy for mobile businesses (C.5.e.iii.(2)(b))
<p>The City is 2.5 square miles. The City's Environmental Service Aides, already driving through the community in search of illegal dumping area also inspecting for mobile businesses improperly discharging wash water to the street, gutter, storm drain, etc. The City also has a complaint process which enables community members to send immediate photos and/or text messages to City staff to address the issues in real time. Enforcement actions are tracked through the City's Illicit Discharge Detection and Elimination (IDDE) spill and discharge complaint tracking system according to MRP C.5.d. in the City's CRW database, along with a paper and electronic filing system (likely to be eliminated in the future). 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.</p>
(c) Provide minimum standards and BMPs developed for additional types of mobile businesses addressed since 2017 Annual Report (C.5.e.iii.(2)(c))
<p>SMCWPPP has not developed minimum standards and BMPs for additional types of mobile businesses other than those described in (a) above. The City continues to refer all businesses to BASMAA training if they are found to be out of compliance. Voluntary compliance with this request has been above 90% successful.</p>

(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):
As needed, at the time of business license issuance and/or during complaint-based or observed issues for inspections.
(e) Discuss inspections conducted at mobile businesses and/or job sites (C.5.e.iii.(2)(e)
Due to the small city footprint, staff is often able to identify in real time issues related to mobile businesses, when conducted during regular business hours.
(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 City's spill and discharge complaint tracking system required by MRP C.5.d.ii. This FY there were enforcement actions taken for mobile businesses. Each mobile business that had illicit discharges was required to take BASMAA online training.

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.
Via the City's website: https://www.ci.east-palo-alto.ca.us/DocumentCenter/View/3036 And http://ci.east-palo-alto.ca.us/DocumentCenter/View/2871
<hr/> The City publicizes the MS4 Map on our Facebook Page and occasionally via Nextdoor when relevant topics come up, such as the RV discharge issues.

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)
# 0	# 0	# 1	# 13
<p>Comments: One site met the criterion for this subsection. The City conducted monthly inspections with one incidence of verbal notice.</p>			
<p>Provide the number of inspections that are conducted at sites not within the above categories as part of your agency's inspection program and a general description of those sites, if available or applicable. The City had modest construction activity during FY 18/19.</p>			

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	1
Level 2	Warning Notice	2
Level 3	Administrative Action	0
Level 4	Legal Action	0
Total		3

C.6.e.iii.(3)(f), ► Illicit Discharges

<p>The City considers mobile businesses conducting construction installations of driveways and/or utilities and CIP work as “construction” inspections. Potential discharge from American Water Enterprises, the City’s contracted water purveyor, due to poor observed BMP implementation over the course of several months. Contractor indicated that the discharges were exempted under the emergency water repair framework, but City inspectors interpreted this differently with some repairs being conducted several days after the original water system break was observed and reported. The City interpreted water system repairs conducted more than one day after the system break is identified is not to be considered an “emergency repair” and all BMPs shall be implemented to protect water quality, and emergency repairs shall also implement BMPs as soon as feasible upon protecting the drinking water quality.</p>	
	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

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

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 at a site 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)	0
Comments: Preparation of improved standard operating procedures were required to be provided from American Water Enterprises to ensure SOPs are adequate to ensure environmental water quality/erosion controls are in place.	

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: Too few construction inspections to fully evaluate or note trends due to low number of active construction sites during the FY.

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: In FY 2018/19 to implement MRP requirements, 1) revised operating procedures for non-compliant contractors, 2) provided training to inspectors and contractor staff; refer to the C.6 Construction Site Control section of the SMCWPPP's FY 2018/19 Annual Report for a description of activities at the Program or regional level.

C.6.f.iii ► Staff Training Summary			
Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance
Field training	September 2018- June 2019	Erosion Control, BMP implementation, NOI/ SWPPP, inlet protection.	

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
In-House CII Training	Year Round	Industry specific on-the-job training for inspections related to businesses that may result in water quality impairment.	2	100%	2	2
CACEO California Assoc. of Code Enforcement Officers	2/8/2019	PC 832 Laws of Arrest	1	50%	1	1
American Red Cross	2/19/2019	Emergency Shelter Fundamentals	2	100%	2	2
Tetra Tech Post Disaster Programs	3/6/2019	Debris Management and Post Disaster Workshop	2	100%	2	2
PIP Meeting	3/19/2019	Pollution Prevention Program	2	100%	2	2
BASMAA Bay Area Stormwater Management Agencies Assoc.	3/21/2019	Recognized Surface Cleaner	2	100%	2	2
Recology/Rethink Waste	3/27/2019	Turning the ship Around Tour Plastics Recycling	2	100%	2	2
ASI American Stormwater Institute	4/10/2019-4/11/2019	MS4 Stormwater Inspector Qualified Stormwater Inspector	1	50%	1	1
CACEO California Assoc. of Code Enforcement Officers	4/25/2019	Intro to Planning and Zoning	1	50%	1	1
HHW Collaborative	5/2/2019	Household Waste Hazmat Class	2	100%	2	2
Recology/Rethink Waste	6/19/2019	General Recycling Tour	2	100%	2	2

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 2018/19 Annual Report for a description of outreach campaign activities conducted at the countywide level.

The City of East Palo Alto also conducted the following outreach efforts:

1. Door to door delivery of information pertaining to overflowing trash bins, illegal dumping and stormwater discharges (or potential discharges) at the residential level for hazardous waste, automotive leaks, etc.
2. Event outreach at many public gatherings including those listed in the education listings below.

C.7.c. Stormwater Pollution Prevention Education

The City has a new program formally communicating with the community with City of East Palo Alto Clean City Program with contact information available at cleancity@cityofepa.org.

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. Indicate if event is local, countywide or regional. Indicate if event is public outreach or citizen involvement.	Identify type of event (e.g., school fair, creek clean-up, storm drain stenciling, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscape presentation, pesticides, stormwater awareness)	Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as: <ul style="list-style-type: none"> • Success at reaching a broad spectrum of the community • Number of participants compared to previous years. • Post-event effectiveness assessment/evaluation results • Quantity/volume of materials cleaned up, and comparisons to previous efforts
Coastal Cleanup Day, September 15, 2018, local, citizen involvement	All age groups, about half children of all ages, creek clean-up, outreach about full trash capture installation and stormwater pollution prevention.	28 volunteers, Modest effort compared to prior years due to lack of advertising as the large-scale event was planned for end of October. 3,500 pounds of trash collected.
Mayor's 1 st Annual Citywide Cleanup October 27, 2018, local; citizen involvement.	All age groups, about half children of all ages, creek clean-up, all ages, stormwater awareness focus.	230 volunteers participated in this citywide cleanup effort to support the Mayor's request to involve the entire community in taking pride. The community picked up X pounds/gallons of trash from city streets. October 20, 2018 with 5,760 gallons of litter in one day
National River Cleanup Day, May 18, 2019, local, citizen involvement.	All age groups, about half children of all ages, creek clean-up, outreach about full trash capture installation and stormwater pollution prevention.	185 volunteers, picked up 2800 gallons of trash collected, citywide. Modest amount near the O'Connor Pump Station and/or Manhattan/Woodland San Francisquito Creek.

Clean Zones	All age groups, about half children of all ages, Monthly events organized by non profits in the City, rewarded with a stipend dependent on hours of community service picking up litter.	Clean Zones (ongoing community cleanups w/DPD) w/ stipends to community groups 5,340 gallons of litter
Encampment Abatement, Year-round	Pickup of solid waste materials associated with RV encampments on Bay Road and Weeks Street, representing the waste of less than 35 families who were illegally dumping due to lack of sanitary services. Some were charging residents in the community to illegally dump near their RV.	<u>Solid Waste</u> : 15 cubic yards * 52 weeks or 780 cubic yards or roughly 157,560 gallons of solid waste and bulky waste material picked up over the course of one year along two roadway sections. <u>Sorted biohazards</u> were roughly 165-gallons a month of bio-hazard contaminated solids and/or liquids, or 1,980 Gallons per year. <u>Hazardous waste</u> removal of roughly 80 gallons per month, 960 gallons per year.
Cinco de Mayo, May 5, 2019, local, public outreach	Community cultural event; focused outreach on appropriate waste disposal, stormwater stewardship. Community support removing solid waste litter and/or recycling at the end of the event was supported by 7 high school students.	X number of community members, all waste appropriately sorted and approximately 10% given information about stormwater stewardship.
Illicit Discharge removal of Hazmat in the public right of way, year round event requires public compliant	Daily receipt of illegal dumping compliants which on occasion includes hazardous waste and/or biohazardous waste in the public right of way.	Contract for service in 2018/2019 required the removal of hundreds of gallons of hazardous waste from the public right of way.
Juneteenth, June 15, 2019, local, public outreach.	Community cultural event; focused outreach on appropriate waste disposal, stormwater stewardship. Litter pickup support was provided by a group of 13 adults.	800 number of community members, all waste appropriately sorted and approximately 10% given information about stormwater stewardship.
Woodland Park Communities Summer Party, 2019, public outreach.	Community cultural event for all age groups, about half children of all ages; focused outreach on appropriate waste disposal, stormwater stewardship. Litter pick-up after event was supported by adults working for private firm.	250 number of community members, all waste appropriately sorted and approximately 10% given information about stormwater stewardship.

FY 2018-2019 Annual Report

Permittee Name: CITY OF EAST PALO ALTO

C.7 – Public Information and Outreach

<p>BASMAA Mobile Business Outreach, public outreach, ongoing, year-round, as-needed</p>	<p>Mobile Business Outreach for adults; focus on BMPs and adequate training, as-needed, required training for all mobile business operators with potential or actual illicit discharges.</p>	<p>4 business owners referred and confirmed for certification with BASMAA mobile business BMPs.</p>
<p>Clean City Program Outreach Campaign, public outreach, ongoing, year-round, as-needed.</p>	<p>Ongoing community outreach about environmental compliance, appropriate waste disposal, water quality improvements for residential locations with overflowing trash, illegal dumping, and/or inappropriate storage of hazardous waste visible in the front yards. Citywide age groups.</p>	<p>Over 1470 residents and businesses were residential homes/families provided outreach about stormwater compliance and/or appropriate solid waste disposal.</p>
<p>Clean City Program RV Outreach campaign</p>	<p>All age groups, but targeting adults. Campaign to educate RV occupants about appropriate waste disposal, providing locations for appropriate sewage discharge and solid waste and support transition into permanent housing options. Resulted in RV community transitioning largely into traditional housing options.</p>	<p>58 RV families provided with over 5,000 contacts with City Staff, with a minimum of daily information both verbal, with additional flyer outreach about appropriate solid waste and sewage disposal through June 2019, until all have appropriate services or have been provided with more traditional housing arrangements which include sanitary services.</p>

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. Coastal Cleanup Day and National River Cleanup Day were both sponsored by Santa Clara Valley Water District and San Mateo County, including RVSP and publicity.

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
Provide the following information: Name Grade or level (elementary/ middle/ high)	Brief description, messages, methods of outreach used	Provide number or participants	Provide agency staff feedback. Report any other evaluation methods used (quiz, teacher feedback etc.). Attach evaluation summary if applicable.
See events for more specific efforts for all age groups. The City is formalizing partnership agreements for receipt of data from organizations working directly with school groups in publicly funded efforts.			

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:							
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 Used¹							
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	None	None	None	None			
Active Ingredient Chlorpyrifos	None	None	None	None			
Active Ingredient Diazinon	None	None	None	None			
Active Ingredient Malathion	None	None	None	None			
Pyrethroids (see footnote #57 for list of active ingredients)	None	None	None	None			
Active Ingredient Type X	None	None	None	None			
Active Ingredient Type Y	None	None	None	None			
Carbamates	None	None	None	None			
Active Ingredient Carbaryl	None	None	None	None			
Active Ingredient Aldicarb	None	None	None	None			
Fipronil	None	None	None	None			

¹Includes all municipal structural and landscape pesticide usage by employees and contractors.

²Weight 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.

Pesticide Category and Specific Pesticide Active Ingredient Used	None						None	N
	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	None	None	None				
Diuron	Reporting not required in FY 15-16	None	None	None				
Diamides	Reporting not required in FY 15-16	None	None	None				
Active Ingredient Chlorantraniliprole		None	None	None				
Active Ingredient Cyantraniliprole		None	None	None				
IPM Tactics and Strategies Used: <ul style="list-style-type: none"> • Use of non-chemical strategies such as monitoring, mowing weeds, mulching. • Removal of plants that require frequent pesticide applications. • Replacing invasive plants with natives. 								

C.9.b ► Train Municipal Employees	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	2
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	10
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.	2
Type of Training: Landscape IPM Continuing Education Workshop on April 16, 2019, ReScape training, local IPM and Pesticide Use training).	

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	<input type="checkbox"/> No
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No,
<p>If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored</p> <p>Contractor is required to check with the City staff prior to use of pesticide application to verify that this is the only appropriate action. Contractor has determined alternative methods are standard practice, including bait-traps and structural controls.</p> <p>No pesticide application was reported by the contractors that provide IPM on City structures. All public right of way is IPM is provided by City staff.</p>			

C.9.d ▶ Interface with County Agricultural Commissioners			
Did your municipality communicate with the County Agricultural Commissioner to: (a) get input and assistance on urban pest management practices and use of pesticides or (b) inform them of water quality issues related to pesticides,	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
<p>If yes, summarize the communication. If no, explain. See Section 9 of the SMCWPPP FY 2018/19 Annual Report for a summary of the Countywide Program's coordination 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.

Summary:

See Section 9 of the SMCWPPP FY 2018/19 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 2018/19 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 2018/19 Annual Report for a summary of the Countywide Program's 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 2018/19, 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.

- The City's effectiveness in pesticide regulation and control has been good.
There are still some areas of improvement regarding community outreach if the City does spray Roundup ProMax in the public right of way.
- Water Quality may not be unduly impacted by the City's IPM practices.
- The City has reduced the use of Roundup Pro Max to nearly zero (the only pesticide currently being applied); and
- Pesticide-related area(s) that (*name of your agency*) 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)	62.5%
Percent Trash Reduction in all TMAs due to Control Measures Other than Trash Full Capture Systems (as reported in C.10.b.ii) ¹	23.0%
Percent Trash Reduction due to Jurisdictional-wide Source Control Actions (as reported in C.10.b.iv)	7.0%
SubTotal for Above Actions	92.5%
Trash Offsets (Optional)	
Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	0%
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	0%
Total (Jurisdictional-wide) % Trash Load Reduction through FY 2018-19	92.5%
<p>Discussion of Trash Load Reduction Calculation and Attainment of the 80% Mandatory Deadline: The City attained and reported 70.1% trash load reduction (including trash offsets) in its FY 17-18 Annual Report. During FY 18-19, the City continued to implement a robust trash control measure program, including the installation of a large trash full capture system. This system helped the City increase 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 92.5% (including trash offsets). The most recent version of the City's Baseline Trash Generation Map can be downloaded at URL here http://www.flowstobay.org/content/municipal-trash-generation-maps.</p>	

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		
Gross Solid Removal Device (Public)	1	873.0
Device installed by bordering Permittees with treatment areas extending into the City of East Palo Alto	-	0.9
Installed Prior to FY 18-19		
Connector Pipe Screens (Public)	38	.2
Total for all Systems Installed To-date	38	873.9
Treatment Acreage Required by Permit (Population-based Permittees)		18
Total # of Systems Required by Permit (Non-population-based Permittees)		N/A

² With the installation of the Gross Solids Removal Device, the acres associated with these 38 systems now overlap with this large device. To avoid double-counting acreage, the areas treated are included under the Gross Solids Removal Device.

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	30.6%	38	29%	Grit, dirt, vegetation/ leaves, single use food containers, residential trash.
2	7.7%			
3	5.3%			
4	0.7%			
5	6.5%			
6	10.4%			
7	0.7%			
8	0.0%			
Total	62.5%*			

Certification Statement:

The City of East Palo Alto certifies that a full capture system maintenance and operation program is currently being implemented to maintain all applicable systems in manner that meets the full capture system requirements included in the Permit.

*The % reduction from full capture includes 0.7% for 28.2 acres of full capture covering non-jurisdictional public K-12, college and university school area

- **29% of Systems Exhibiting Plugged/Blinded Screens I in FY 18-19** –the percentage of all full capture systems that based on operation and maintenance records were significantly plugged/blinded or greater than 50% full at the time of maintenance. Note: if one device is plugged two times in one year, it is still counted as one system for this calculation.
- **Summary of Maintenance Issues and Corrective Actions** – The City is continuing to monitor the large-scale full trash capture device to determine the routine maintenance frequencies or other changes to operation/maintenance procedures. The City has seen on average 29% blockage of the device most recently during the first year of storm events while the device has been operational since being constructed just prior to the rainy season of FY 18/19.

C.10.b.ii ► Trash Reduction – Other Trash Management Actions (PART A)	
Provide a summary of trash control actions other than full capture systems or jurisdictional source controls that were implemented within each TMA, including the types of actions, levels and areal extent of implementation, and whether actions are new, including initiation date.	
TMA	Summary of Trash Control Actions Other than Full Capture Systems
1A	Much of this TMA is treated with a new large-scale full trash capture device (LFCD) at the O'Connor Pump Station, Connector Pipe Screens, which are cleaned twice a year and when the LFCD device is more than 50% full. Future efforts are likely to remove all small full trash capture devices already being treated by the LFCD large scale device at the end of the O'Connor Watershed, which serves this TMA, along with a majority of the City's watershed.
1B	This trash management area has received enhanced trash capture effort due to the intensity of trash in this area with the installation of the LFCD, Enhanced street sweeping efforts, community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts. This TMA had existing street sweeping parking enforcement signage with increased effectiveness with enhanced parking enforcement (new enforcement staff was hired).
1C	This trash management area has received enhanced trash capture effort due to the intensity of trash in this area with the installation of the LFCD, Enhanced street sweeping efforts, community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts. This TMA did not have existing street sweeping parking enforcement signage; this signage was installed in FY 15-16 but vehicles did not adhere to the new enforcement signage. As such, increased effectiveness was provided with enhanced parking enforcement (new enforcement staff was hired). With this, streets are much cleaner.
1D	This trash management area has received enhanced trash capture effort due to the intensity of trash in this area with the installation of the LFCD, Enhanced street sweeping efforts, community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts. This TMA did not have existing street sweeping parking enforcement signage; this signage was installed in FY 15/16 but vehicles did not adhere to the new enforcement signage. As such, increased effectiveness was provided with enhanced parking enforcement (new enforcement staff was hired). With this, streets are much cleaner. There is one street in this TMA which has become (in FY 16/17) a parking area for RVs where people are living. Solid waste was piling up on the street, and human waste was becoming a possible public health issue; this matter was fully resolved in FY 18/19 by the City's efforts.
2	This TMA does not currently have street sweeping signage to restrict parking during street sweeping hours but much of it is now being treated with the installation of the LFCD. There will be future efforts for stormwater enhancements including a CIP for street sweeping signage in this area. Community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts have been enhancements to the program in this area.
3	This TMA represents a Retail area which is now covered with the installation of the LFCD. Efforts have also been made to work directly with retailers to address appropriate solid waste management, including litter, associated with the parking areas, solid waste bin management, and enhanced trash and recycling bins. This has included intensive enforcement for solid waste

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	management with fines and penalties for noncompliance. The City has also enhanced street sweeping around the perimeter of the shopping center.
4	This TMA refers to schools which may in this TMA are covered for full trash capture with the installation of the LFCD. Efforts are being made for school aged students to participate in litter abatement efforts for volunteer programs and field trips to Cooley Landing, and Coastal Clean and National Rivers Cleanup Days, summer programs, Community cleanup efforts through the Clean Zone activities, and ongoing community cleanup efforts organized or supported by the City.
5A and 5B	This trash management area has received enhanced trash capture effort due to the intensity of trash in this area with the installation of the LFCD, Enhanced street sweeping efforts, community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts. This TMA had existing street sweeping parking enforcement signage with increased effectiveness with enhanced parking enforcement (new enforcement staff was hired).
6	This trash management area has received enhanced trash capture effort due to the intensity of trash in this area, Enhanced street sweeping efforts, community cleanups, intensive enforcement for solid waste management, and careful audits of the street sweeping efforts. This TMA had existing street sweeping parking enforcement signage with increased effectiveness with enhanced parking enforcement (new enforcement staff was hired).
7	This trash management area has received enhanced trash capture effort due as the City actively enforced on much of the private property which was allowing homeless encampments to impact water quality in the local baylands. RVs and oversized vehicles were also parking in this area, which was abated in FY 18/19 through the City's RV Safe Parking Pilot Program. Private property cleanups, intensive enforcement for solid waste management, and structural controls of the sites to ensure isolated areas are not accessible to the public has resulted in substantial compliance and eliminated many tons of materials formerly distributed directly into the San Francisco Bay.
8*	This TMA represents the parks and open space of the City, which the City has provide enhanced trash capture with the installation of the LFCD and through installation of "No Camping" signage in the public right of way, along with abating litter through staff pick-up of litter, along with community cleanups throughout the year. Further, requiring parties to address litter as a condition of the permit issuance.

Summary of Trash Control Measures Other than Full Capture Devices:

On-land Cleanup: Beginning in August 2012, the City began the "Partnership in Pride campaign" in an effort to engage community members to take more pride in the blight throughout the City, with a focus on litter and graffiti. Beginning with a high school football team building exercise, the Campaign provided an opportunity for many students to earn community service, while benefiting the community. This has taken shape through the Police Department's "Fit Zone" program morphing into the Police Departments "Clean Zone" which provides police support and stipend funding to non-profits who wish to cleanup the community through litter abatement efforts. This information was reported in the public information and participation section of this report. Grassroots Ecology has hosted dozens of work days at the Cooley Landing Environmental Education Center, which sits bayside. Due to the isolated nature of the location of this park and the fact that ¾ of the park sits alongside the San Francisco Bay, over 300 pounds of trash (at a minimum) were eliminated from direct windblown access to being deposited into the San Francisco Bay.

□ Partial Capture Devices: The City of East Palo Alto has maintained an installed fence/banister/flood control wall along the San Francisquito Creek which has provided a substantial reduction in directly deposited litter and trash, which has subsequently preventing hundreds of gallons of trash from entering the waterways by restricting direct access into the San Francisquito Creek as verified by the FY 18.19 annual Creek Walk. As previously reported, while this was not the primary function of this flood

control wall, it has reduced the trash load at the City's trash hot spot tremendously and has also provided enhanced understanding of the amount of litter entering the San Francisquito Creek via stormdrain outfalls from City Streets.

□ Storm Drain Inlet Cleaning: When the City incorporated, the stormdrain system was poorly maintained. Since the MRP 1.0, the City has been maintaining all stormdrain inlets with the Maintenance Staff under the Public Works Division. Materials are removed with a vactor truck twice a year to ensure the inlets are not prone to flooding. In FY 13/14, the City had a stormdrain assessment conducted to determine the functionality of the stormdrain system as well as the areas throughout the stormdrain system that require enhanced debris removal due to areas of damaged infrastructure. The Stormdrain Master Plan was prepared and is being implemented to ensure incremental improvement throughout the stormdrain system.

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

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

During FY 17/18, the City regularly cleaned inlet devices and expanded cleanout to include stormdrain manholes, where identified as heavily impacted with sediment and other materials through the recent Stormdrain Master Plan. In one instance over 6,000 gallons of effluent was observed and addressed by sending this material to the sanitary sewer prior to rains commencing.

During FY 18/19, with the Water Board's support and awareness, the City installed a full trash capture device which treats approximately 62.5% of the City's watershed for full trash capture.

□ Uncovered Loads: During MRP 1.0, the City attempted a variety of efforts to reduce uncovered loads. Due to the large number of self-hauling businesses, local efforts have been constrained by varying staffing levels and the prioritization. In FY 14/15 and 15/16, the City began hiring community service aids to provide parking enforcement. In FY 16/17, the City expanded the effort of addressing uncovered loads by working with local businesses and parking enforcement to ensure all loads are properly covered.

Fiscal Year 17/18 the City failed to expand this effort to begin fines and penalties when specific vehicles are not addressing the issue due to challenges resulting in illicit discharges from recreational vehicles. During FY 18/19, this issue was largely addressed by the entire city and City Council support with the establishment of the RVSPPP.

□ Anti-littering and illegal dumping enforcement activities: During the term of MRP 1.0, the City has worked on a number of fronts to address illegal dumping and littering. Illegal dumping is tracked by complaint via a new single contact point—the City's Community and Economic Development receptionist—who takes each call refers it to the appropriate person via email for electronic reporting. Staff then verifies and inspects each complaint and discusses the illegal dumping with nearby residents to inform them of the illegal issues. Staff, when appropriate, sends a copy to the City's franchise hauler, Recology, who picks up the materials within 24 hours. The City has increased tracking and intends to hold those repeat violators accountable if there is a recurrence of illegal dumping by an individual. To date, the City has successfully prosecuted at least two incidents of illicit discharge/illegal dumping. The City is also working to encourage residents to utilize the reward system of obtaining \$500 per reported incident that results in illegal dumping or illicit discharge prosecution and has utilized banners to detail the crime and encourage reporting. This has been taken up by local news channels which has further spread the word of the campaign. The banners have resulted in a number of "hot spots" of illegal dumping being eliminated and a more robust response by the community in reporting illegal dumping incidents. The City expanded this program dramatically in FY 18/19 as there was an upsurge of illegal dumping activity due to lack of sanitary services for a growing number of residents. This matter was largely abated through placement of banners at strategic locations and outreach both on social media as well as through the distribution of over 1400 "green tags" to residents indicating when illegal dumping was put out on the streets through the City's enhanced illicit discharge reporting and pro-active abatement efforts.

□ The problem is on the rise. In 2014/15, there were over 700 cases of reported illegal dumping. During FY 15/16, there were over 1,000 reports of illegal dumping. This information is tracked through Recology, who provides reports to the City as part of the Franchise Agreement. During FY 17/18, the City has taken over the recordation of all complaints beginning in May 2018 and started actively talking to residents who reside near a location where an illegal dumping or illicit discharge has occurred. Staff is obtaining voluntary compliance in 90% of the incidents when a resident is at home when being contacted. These residents take ownership of the materials that have been illegally dumped and appropriately schedule solid waste services. In at least two instances, residents have even removed materials found on streets

other than their own, and recovered the materials to appropriately dispose of them. The City is hosted a 1st Annual Great Citywide Litter Pick-up in October 2018 as a celebration of the 1st year of the Clean City Program, in hopes that the community will become educated about litter abatement efforts. The Mayor has requested a "call to action" from all residents and business owners, to provide an hour of community service to eliminate the litter problem on a single day. Anti-littering has also been a focus for the community during the MRP 1.0 permit term. Primary activities have focused on providing clean-up events, encouraging volunteer engagement, and providing classroom education on the issue of illegal dumping and littering at the 3rd and 5th grades and high school level. While these activities have educated students, which are evident via survey of young people walking on local streets, the incidence of littering has not been suppressed enough by this activity to see the substantial litter reductions necessary to meet current litter reduction future targets, as indicated during recent annual assessments. During FY17/18, the City has implemented a Solid Waste Management Program, with City Council support, which will be expanded within the Clean City Plan to address activities associated with illegal dumping and illicit discharge. It is anticipated that this expanded program, which will include new part time staff members, will have started to address the source of many illegal dumping issues: tenants and businesses who lack access to adequate trash service. It is expected to be widely expanded to include enhanced enforcement in FY 18/19.

□ Improved Trash Bin/Container Management: During the permit term for MRP 1.0, the City has continuously revised our solid waste service, working in conjunction with Rethink waste and Recology, our franchise hauler. Working in coordination with the commercial and residential sectors, the City assisted in targeted audits of solid waste services and provided inspections for stormwater compliance which would reveal if the amount of trash service is appropriate and adequate. In cases when bin capacity is less than necessary, upsized service is required. During FY17/18, the City has implemented a Solid Waste Management Program, with City Council support, which includes a Clean City Plan to address activities associated container management, illegal dumping and homeless encampments. This effort is likely to be further expanded in FY 18/19, which will include a new full time staff member, to continue to address the source of many overflowing bin issues: tenants and businesses who lack access to adequate trash service and expand local policies to address these issues. In FY 18/19, access to adequate sized bins has greatly reduce the quantity of trash that makes its way to the local streets and waterways along with the abatement of a new major encampment which has resulted in illicit discharges of sewage and solid waste into local roadways being eliminated. However, due to the housing crisis, the numbers of illegal dumping incidents and reports of discharges has surged and the City has appropriately responded with equal effort to educate and enforce on such activities.

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 #6 because limited street lengths are available for assessments. No OVTAs were conducted in TMAs #3 and #5 because both TMAs are addressed via full capture devices. No OVTAs were conducted in TMA #8 because the entire TMA is comprised of low trash generating areas.
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TMA ID <i>or (as applicable) Control Measure Area</i>	Total Street Miles ³ Available for Assessment	Summary of On-land Visual Assessments ⁴			Jurisdictional-wide Reduction (%)
		Street Miles Assessed	% of Available Street Miles Assessed	Avg. # of Assessments Conducted at Each Site ^{5,6}	
1	5.63	0.98	17.4%	5.8	12.7%
2	5.52	0.65	11.7%	5.7	9.3%
3	0.00	NA	NA	NA	NA
4	0.21	0.20	95.5%	6.0	0.0%
5	0.00	NA	NA	NA	NA
6	0.51	0.00	0.0%	0.0	0.0%
7	0.46	0.38	81.3%	6.0	0.9%
8*	0.00	NA	NA	NA	NA
Total		2.21	-	-	23.0%

³ Street miles are defined as the street lengths and do not include curbs associated with medians.

⁴ 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.

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.

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%).

*TMA 8 is comprised entirely of low trash generating areas.

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
Single Use Bag Ordinance	The City Council adopted the San Mateo County Reusable Bag Ordinance on April 19, 2012 for implementation October 1, 2012. This prohibits the distribution of single-use plastic bags and requires a \$0.10 fee be assessed for paper or heavy plastic bags.	Inspections and hot spot assessments are conducted to assess the effectiveness of the control measure in reducing trash from entering the municipal stormwater conveyance system. The City developed its % trash reduced estimate using the following assumptions: 1.) Single use plastic bags comprise 8% of the trash discharged from stormwater conveyances, based on the Regional Trash Generation Study conducted by BASMAA; 95% of single use plastic bags distributed in the City/ County are affected by the implementation of the ordinance, based on the County of San Mateo's Environmental Impact Report; and of the bags affected by the ordinance, there are now 90% less bags being distributed, based on customer complaints received by the County of San Mateo's Department of Environmental Health Services. This is conservative estimate given that in FY 13- 14 Environmental Services only received complaints about 4, of the over 1900 businesses in San Mateo County that are affected by the single-use plastic bag ordinances, and the fact that staff inspections have indicated no violations of this ordinance.	Results of assessments conducted by the County of San Mateo on behalf of all municipalities in San Mateo County indicate that the City's ordinance is effective in reducing the number of single use plastic bags in stormwater discharges. This preliminary conclusion is based on the very small number of complaints received from customers about businesses in San Mateo County that are continuing to use single use plastic bags after ordinances were adopted.	7%
Expanded Polystyrene Food Service	No such ban; being considered for FY 19/20	No such ban; being considered for FY 19/20	No such ban; being considered for FY 19/20	No such ban; being

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.

Ware Ordinance				considered for FY 19/20
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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 City 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 City of East Palo Alto. Implementation occurred through both the City'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 City 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
EPA01	N	9/28/2019	2.4	0.6	0.2	0.05	0.005
EPA02	N	9/15/2019	N/A	N/A	1.5	0.05	0.05

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 City's baseline trash generation maps. Under California Government Code Sections 4450 through 4461, the construction, modification, or alternation of facilities and/or structures on these parcels are under the jurisdiction of the California Division of State Architect and not the City. The public right-of-way (e.g., streets and sidewalks) surrounding these parcels remain as jurisdictional on the City's baseline trash generation maps. Many of these parcels are included within the drainage area of the City's full trash capture device.	All Applicable
During FY 16/17, the City switched out all components that were deemed "full trash capture equivalent" in exchange for full trash capture devices. The City has been pursuing the installation large scale full trash capture devices where the lowest installation costs, lowest maintenance requirements, and highest drainage area will be treated. The present effort includes two major outfall locations that drain roughly 70% of the City.	1A,1C,1D, Portions of 2,3,4,5,6,and 8
This TMA requires coordination with future developers to address the drainage as it currently flows into drainage outfalls that are submerged with sediment and bay mud. Treatment depends on future planned development of TMA #7. The City is completing a major CIP in FY 19/20, which will address some of this TMA with full trash capture.	1B
This TMA has largely been addressed with the installation of the City's Large Scale Full Trash Capture Device but will require additional work to address the full trash capture needs as the stormwater comingles in this area with the City of Menlo Park as well as the water from the Caltrans drainage. This will require collaboration with these other jurisdictions.	2
This TMA requires coordination with future developers to address the drainage as it currently flows into drainage outfalls that are submerged with sediment and bay mud. Treatment depends on future planned development of the Ravenswood Specific Plan area.	7

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	# of Events, Frequency	Amount of litter removed (gallons/pounds)
Additional Creek and Shoreline Cleanups (Max 10% Offset)	N/A	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 18-19.⁷

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	3	20	456	0	480	309	0	170	0	480	30.6%	337	126	17	0	480	12.7%	43.3%
2	1	1	226	0	228	75	0	153	0	228	7.7%	107	76	46	0	228	9.3%	17.0%
3	0	0	50	0	50	50	0	0	0	50	5.3%	50	0	0	0	50	0.0%	5.3%
4	0	36	0	0	36	25	11	0	0	36	0.7%	25	8	2	0	36	0%	0.7%
5	0	135	28	0	162	162	0	0	0	162	6.5%	162	0	0	0	162	0.0%	6.5%
6	0	0	116	0	116	99	0	18	0	116	10.4%	99	0	18	0	116	0.0%	10.4%
7	0	102	0	0	102	25	78	0	0	102	0.7%	61	42	0	0	102	0.9%	1.6%
8	92	0	0	0	92	92	0	0	0	92	NA	92	0	0	0	92	NA	NA
Totals	97	294	876	0	1,267	838	89	341	0	1,267	62.5%*	302	642	319	3	1,267	23.0%	85.5%

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.

*The % reduction from full capture includes 0.7% for 28.2 acres of full capture covering non-jurisdictional public K-12, college and university school area

⁷ 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 Methodology¹ 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.

¹BASMAA 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 Methodology¹ 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.

¹BASMAA 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 City has yet to have any project implementing copper architectural features. To pre-empt the potential for discharge, there is a standard comment for pre-planning requiring appropriate management for waste copper.

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 city has modest pools/spas and fountains. Due to the size of the agency, any discharges are readily visible for on-street discharges. The Palo Alto Water Quality Control Plant provides direct outreach to those private property owners with spas/pools, and require discharge to the sanitary system.

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:

City inspections of metal fabricators includes requests as to potential use of copper. If identified, the City would review standard operating procedures for the potential of copper entering exterior of buildings and/or potential discharges.

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

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

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

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

Summary:

The City provides comments for pre-proposal and project review for WELO and less toxic pest control for landscape management. The City adopted the BAWSCA WELO, which in and of itself directly encourages native plant and low-to-no water use plants, which promotes drought tolerant and native vegetation.

The City continually addresses illicit discharges for landscape irrigation runoff, in addition to runoff from repairs of the water system through the ERP.

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."