



# City of East Palo Alto

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## Office of the City Manager

September 29, 2017

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

**Subject: City of East Palo Alto FY 16/17 Annual report**

Dear Mr. Wolfe,

This letter and Annual Report with attachments is submitted by The City of East Palo Alto pursuant to the Municipal Regional Stormwater NPDES Permit (MRP), Order No. R2-2015-0049, NPDES Permit No. CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. This Annual Report provides documentation of compliance activities conducted during FY 16/17.

With the assistance of the Water Board, the City of East Palo Alto has identified deficiencies and made updates to the FY 15/16 Enforcement Response Plan, and Business Inspection Plan, which resulted in fully integrating the inspection requirements into various City divisions in response to the Notice of Violation the City received.

The City has also made progress in Amending the Long Term Trash Load Reduction Plan, shifting from "trash capture equivalency measures" towards full trash capture device use as a consistent long term remedy. While the originally proposed large scale full trash capture concept may result in substantial life safety impacts, the City will continue to pursue imminent full trash capture device installation to meet our mandates, with full support from the City Council and we will continue to keep your team abreast as we pursue solutions that will meet the requirements while keeping our community safe.

The City remains vigilant on meeting MRP 2.0 mandates and will continue to update programs as needed for effective pollution prevention and compliance verification.

Sincerely,




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**Carlos Martinez**  
**City Manager**

## Certification Statement

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

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



**Kamal Fallaha**  
**Public Works Director**

Attachment:

City of East Palo Alto FY 16/17 Annual report



**Municipal Regional Permit**  
**National Pollution Discharge Elimination System**  
**City of East Palo Alto**  
**ANNUAL REPORT**  
**Fiscal Year 2016-2017**  
**July 1, 2016-June 30, 2017**

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Section 1 – Permittee Information **Section 1 – Permittee Information**

Background Information					
Permittee Name:	<a href="#">City of East Palo Alto</a>				
Population:	31,000				
NPDES Permit No.:	<a href="#">CAS612008</a>				
Order Number:	<a href="#">R2-2015-0049</a>				
Reporting Time Period (month/year):	<a href="#">July 1, 2016 through June 30, 2017</a>				
Name of the Responsible Authority:	<a href="#">Kamal Fallaha</a>	Title:	<a href="#">Public Works Director</a>		
Mailing Address:	<a href="#">1960 Tate Street</a>				
City:	<a href="#">East Palo Alto</a>	Zip Code:	<a href="#">CA</a>	County:	<a href="#">94025</a>
Telephone Number:	<a href="#">650-853-3117</a>	Fax Number:	<a href="#">650-853-3179</a>		
E-mail Address:	<a href="mailto:kfallaha@cityofepa.org">kfallaha@cityofepa.org</a>				
Name of the Designated Stormwater Management Program Contact (if different from above):	<a href="#">Michelle Daher</a>	Title:	<a href="#">Management Analyst: Environmental Programs</a>		
Department:	<a href="#">Community and Economic Development</a>				
Mailing Address:	<a href="#">1960 Tate Street</a>				
City:	<a href="#">East Palo Alto</a>	Zip Code:	<a href="#">CA</a>	County:	<a href="#">94025</a>
Telephone Number:	<a href="#">650-853-3197</a>	Fax Number:	<a href="#">650-853-3179</a>		
E-mail Address:	<a href="mailto:mdaher@cityofepa.org">mdaher@cityofepa.org</a>				

**Section 2 - Provision C.2 Reporting Municipal Operations**

**Program Highlights and Evaluation**

Highlight/summarize activities for reporting year:

Summary:

**During FY 16/17, the City has 1) participated in SMCWPPP's Municipal Maintenance Subcommittee; 2) prepared a full capture device assessment; 3) further developed the City's O&M data management program including the adoption of the SMCWPPP Excel tracking template for maintenance of the small trash capture basket type devices; and 3) adopted the SMCWPPP pesticide tracking Excel template for reporting pesticide data management program for use in FY 2017/2018.**

**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.

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

Comments:

**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.

<b>Y</b>	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
<b>Y</b>	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments:

**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.

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

Comments:

C.2.e. ► Rural Public Works Construction and Maintenance	
Does your municipality own/maintain rural <sup>1</sup> roads:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If your answer is <b>No</b> then skip to <b>C.2.f.</b>	
Place a <b>Y</b> in the boxes next to activities where applicable BMPs were implemented. If not applicable, type <b>NA</b> in the box and provide an explanation in the comments section below. Place an <b>N</b> 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:	

C.2.f. ► Corporation Yard BMP Implementation	
Place an <b>X</b> 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 <b>Stormwater Pollution Prevention Plan (SWPPP)</b> for the Corporation Yard(s)

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



**FY 2016-2017 Annual Report**

**C.2 – Municipal Operations**

**Permittee Name:** City of East Palo Alto

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:

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

Comments:

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 <sup>2</sup>	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
City of East Palo Alto Corporation Yard 150 Tara Road East Palo Alto, CA	HHW Collection with covered secondary containment, Illegal Dumping Collection with covered bins, Stormdrain Vacuum Collection with three chamber interceptor and stormdrain inlet protection, Stockpiles for park and median maintenance covered, vehicle storage with fluid management	10/04/2016	Develop long term HHW disposal plan for pickup of illegal dumping; Ensure all HW has secondary containment in a covered area; Move HW materials from outdoors to covered area; Obtain pesticide training prior to pesticide applications; Ensure all non-op vehicles have fluid containment under chassis	Contract for ongoing HHW collection is still a long term need—RFP is imminent; HHW materials were picked up from contractor See #1 above Completed same day Completed prior to pesticide use Completed same day

<sup>2</sup> Minimum inspection frequency is once a year during September.

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

<b>C.3.b.iv.(1) ► Regulated Projects Approved Prior to C.3 Requirements</b>				
(For FY 2016-17 Annual Report only) Does your agency have any Regulated Projects that were approved with no Provision C.3 stormwater treatment requirements under a previous MS4 permit and that did not begin construction by January 1, 2016 (i.e., that are subject to Provision C.3.b.i.(2))?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If yes, complete attached Table C.3.b.iv.(1).				

<b>C.3.b.iv.(2) ► Regulated Projects Reporting</b>
Fill in attached table <b>C.3.b.iv.(2)</b> or attach your own table including the same information.

<b>C.3.e.iv. ► Alternative or In-Lieu Compliance with Provision C.3.c.</b>				
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
Comments (optional):				

<b>C.3.e.v. ► Special Projects Reporting</b>				
1. In FY 2016-17, has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii.(2) for any of the three categories of Special Projects (Categories A, B or C)?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
2. In FY 2016-17, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the <b>C.3.b.iv.(2)</b> Table, and the <b>C.3.e.v.</b> 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.				

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

Site Inspections Data	Number/Percentage
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the previous fiscal year (FY15-16)	<b>12</b>
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the reporting period (FY 16-17)	<b>14</b>
Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 16-17)	<b>6</b>
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 16-17)	<b>43%</b>

**C.3.h.v.(3)(d)-(e) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting**

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

Summary:  
**The City requires certified 3rd party inspection of vaults within the jurisdiction.**  
**All vegetated stormwater treatment facilities are inspected in-house according to the Enforcement Response Plan at MRP required frequency.**

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:  
**Vegetated features have been noted as requiring replacement in several locations with one specific location requiring replacement of the entire irrigation system which was non-functional resulting in complete plant replacement.**

**C.3.h.v.(4) ► Enforcement Response Plan**

(For FY 2016-17 Annual Report only) Has your agency completed an Enforcement Response Plan for all O&M inspections of stormwater treatment measures by July 1, 2017?	<b>X</b>	<b>Yes</b>		<b>No</b>
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If No, provide schedule for completion:

C.3.i. ► Required Site Design Measures for Small Projects and Detached Single Family Home Projects	
On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.	
Summary: <b>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.</b>	

C.3.j.i.(5)(a) ► Green Infrastructure Framework or Work Plan			
(For FY 2016-17 Annual Report only) Was your agency's Green Infrastructure Framework or Work Plan approved by the agency's governing body, mayor, city manager, or county manager by June 30, 2017?	<input checked="" type="checkbox"/>	<b>Yes, approval documentation attached</b>	<input type="checkbox"/> No
If Yes, describe approval process and documentation: <b>The Green Infrastructure Framework/Work Plan has been completed and adopted by the City Manager with the Green Infrastructure Plan included by City Council adopted and funded Capital Improvement Plan for a project to be initiated during Fiscal Year 2017/2018 included with funding for a consultant to assist the City in finalizing this project. The CIP is available at the following link: <a href="http://www.ci.east-palo-alto.ca.us/DocumentCenter/View/2736">http://www.ci.east-palo-alto.ca.us/DocumentCenter/View/2736</a></b>			
If No, provide schedule for completion:			

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: <b>The City has conducted outreach to the City Council regarding the upcoming changes as the City plans to shift from grey to green infrastructure for stormwater conveyance. City staff has attended training, including the City's engineering division, the City's planning division, the Public works Director, the City Engineer and the City Manager. Conditions of Approval for the Ravenswood Business District also include requirements for Green Infrastructure as the City begins development efforts in this northern segment of the City where stormdrains are ill designed or non-existent. As project concepts come into the City for preview, the City has been informing developers that these requirements will be forthcoming, and requiring voluntary compliance with finding solutions prior to the submittal of development proposals.</b>	
<b>Please refer to the SMCWPPP FY 16-17 Annual Report for a summary of outreach efforts implemented.</b>	

**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.

**Through the plan review process, conditions of approval are placed on projects over an acre in size to require, in addition to low impact development requirements, that the project proponent works with the City to identify the potential for green infrastructure along the public right of way to treat street and sidewalk runoff with treatment measures consistent with the BASMAA guidance. Projects, where feasible, integrate GI components into the project with design details consistent with City approval. Upon completion, the City will provide maintenance on these facilities for the life of the system.**

Summary of Planning or Implementation Status of Identified Projects:

**The City has several development projects that are in the pre-submittal phase, all of which have been informed that a Green Infrastructure review will be required prior to design approval. As of this time, none of these projects have submitted a formal application, and will likely be reported on in FY 17/18 if formal applications have been submitted. The City intends to offer a menu of options for public right of way green infrastructure alternatives.**

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

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

**Please refer to the SMCWPPP FY 16-17 Annual Report for a summary of efforts conducted to help regional, State, and federal agencies plan, design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects.**

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

On an annual basis, report progress on development and implementation of methods to track and report implementation of green infrastructure

measures and provide reasonable assurance that wasteload allocations for TMDLs are being met.
<b>Please refer to the SMCWPPP FY 16-17 Annual Report for a summary of methods being developed to track and report implementation of green infrastructure measures.</b>

<b>C.3.b.iv.(1) ► List of Regulated Projects Approved Prior to C.3 Requirements</b>			
<b>Project Name Project No.</b>	<b>Project Location<sup>3</sup>, Street Address</b>	<b>Type of Stormwater Treatment Required<sup>4</sup></b>	<b>Type of Exemption Granted<sup>5</sup></b>
<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>

<sup>3</sup> Include cross streets

<sup>4</sup> Indicate the stormwater treatment system required, if applicable

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



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

Project Name Project No.	Project Location <sup>6</sup> , Street Address	Name of Developer	Project Phase No. <sup>7</sup>	Project Type & Description <sup>8</sup>	Project Watershed <sup>9</sup>	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft <sup>2</sup> ) <sup>10</sup>	Total Replaced Impervious Surface Area (ft <sup>2</sup> ) <sup>11</sup>	Total Pre- Project Impervious Surface Area <sup>12</sup> (ft <sup>2</sup> )	Total Post- Project Impervious Surface Area <sup>13</sup> (ft <sup>2</sup> )
<b>Private Projects</b>											
None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report
<b>Public Projects</b>											
None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report
Comments: During FY 16/17 the City had an ongoing water moratorium which precluded any new development that would require additional water meters or enhanced water lines. As such, no new projects have been approved. It is anticipated that development will resume during the second half of FY 17/18. No regulated public projects were approved during this Fiscal Year.											

<sup>6</sup>Include cross streets

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

<sup>8</sup>Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

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

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

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

<sup>12</sup>For redevelopment projects, state the pre-project impervious surface area.

<sup>13</sup>For 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 <sup>14</sup>	Application Final Approval Date <sup>15</sup>	Source Control Measures <sup>16</sup>	Site Design Measures <sup>17</sup>	Treatment Systems Approved <sup>18</sup>	Type of Operation & Maintenance Responsibility Mechanism <sup>19</sup>	Hydraulic Sizing Criteria <sup>20</sup>	Alternative Compliance Measures <sup>21/22</sup>	Alternative Certification <sup>23</sup>	HM Controls <sup>24/25</sup>
<b>Private Projects</b>										
None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report

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

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

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

<sup>17</sup>List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

<sup>18</sup>List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

<sup>19</sup>List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners' association; O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

<sup>20</sup>See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

<sup>21</sup>For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

<sup>22</sup>For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

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

<sup>24</sup>If HM control is not required, state why not.

<sup>25</sup>If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

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

Project Name Project No.	Approval Date <sup>26</sup>	Date Construction Scheduled to Begin	Source Control Measures <sup>27</sup>	Site Design Measures <sup>28</sup>	Treatment Systems Approved <sup>29</sup>	Operation & Maintenance Responsibility Mechanism <sup>30</sup>	Hydraulic Sizing Criteria <sup>31</sup>	Alternative Compliance Measures <sup>32/33</sup>	Alternative Certification <sup>34</sup>	HM Controls <sup>35/36</sup>
<b>Public Projects</b>										
None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report	None to Report
Comments: <b>During FY 16/17 the City had an ongoing water moratorium which precluded any new development that would require additional water meters or enhanced water lines. As such, no new projects have been approved. It is anticipated that development will resume during the second half of FY 17/18.</b>										

<sup>26</sup>For public projects, enter the plans and specifications approval date.

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

<sup>28</sup>List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

<sup>29</sup>List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

<sup>30</sup>List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc...) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

<sup>31</sup>See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

<sup>32</sup>For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.v.(1)(m)(i) for the offsite project.

<sup>33</sup>For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.v.(1)(m)(ii) for the Regional Project.

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

<sup>35</sup>If HM control is not required, state why not.

<sup>36</sup>If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

**C.3.h.v.(2) ► Table of Newly Installed<sup>37</sup> 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 <sup>38</sup> For Maintenance	Type of Treatment/HM Control(s)
Senior Housing Mid Peninsula	2358 Univerity Ave	Mid Penn Housing	Bioretention
Cavallino Collision/ Fix It Auto	1874/1880/1884? W Bayshore Rd	Ric Donofrio	Treatment Trench (previously installed in 2008, without O&M Agreement)
Sobrato	2100 University Ave	Sobrato Organization	Flow Through Planters

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

<sup>38</sup> State the responsible operator for installed stormwater treatment systems and HM controls.

<b>C.3.e.v. ► Special Projects Reporting Table</b>												
<b>Reporting Period – July 1 2016 - June 30, 2017</b>												
<b>Project Name &amp; No.</b>	<b>Permittee</b>	<b>Address</b>	<b>Application Submittal Date<sup>39</sup></b>	<b>Status<sup>40</sup></b>	<b>Description<sup>41</sup></b>	<b>Site Total Acreage</b>	<b>Gross Density DU/Acre</b>	<b>Density FAR</b>	<b>Special Project Category<sup>42</sup></b>	<b>LID Treatment Reduction Credit Available<sup>43</sup></b>	<b>List of LID Stormwater Treatment Systems<sup>44</sup></b>	<b>List of Non-LID Stormwater Treatment Systems<sup>45</sup></b>
<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>	<b>None to Report</b>

<sup>39</sup>Date that a planning application for the Special Project was submitted.

<sup>40</sup> 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.

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

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

<sup>43</sup>For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.

<sup>44</sup>: 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.

<sup>45</sup>List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

**Special Projects Narrative**

Nothing to report: no Special Projects were approved or installed in this jurisdiction within the MRP permit term(s).

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

Project Name and Location <sup>46</sup>	Project Description	Status <sup>47</sup>	GI Included? <sup>48</sup>	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement <sup>49</sup>
Bay Road	Roadway replacement from below the gravel sub-base.	Design Review: 95% drawings	Partial	Proposed to include tree well filters on portions of the project, where practicable.

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

Project Name and Location <sup>50</sup>	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Bay Road	Roadway replacement from below the gravel sub-base.	Design Review: 95% drawings	Proposed to include tree well filters on portions of the project, where practicable. Funding only available for a portion of the project. Still being determined how this project will phase.

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

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

<sup>48</sup> 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.

<sup>49</sup> 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.

<sup>50</sup> List each planned (and expected to be funded) public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. Note that funding for green infrastructure components may be anticipated but is not guaranteed to be available or sufficient.

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

**Program Highlights and Evaluation**

Highlight/summarize activities for reporting year:

Summary:

During FY 16/17, the City has 1) updated our business plans, facilities lists, and inspection frequencies and priorities; 2) conducting inspections; 3) conducting training, 4) participating in the Program's CII Subcommittee, and 5) updated our Enforcement Response Plan, which applies to Commercial and Industrial inspection activities, among all inspections pertinent to MRP compliance. Refer to the C.4 Industrial and Commercial Site Controls section of the SMCWPPP FY 16-17 Annual Report for a description of Program activities. Further, the City has entirely revised the inspection program to include Enforcement personnel that are able to readily escalate enforcement as needed and track inspections, now integrated into the Code Enforcement program.

In response to the Regional Water Board's January 30, 2017 C.4 and C.5 Compliance Letter the City of East Palo Alto: 1) participated in February 15, 2017 meeting to discuss responses, 2) reviewed and approved April 28, 2017 response letter to RWB, 3) updating the City's ERP by June 30th to include the City's responsibility for all stormwater compliance with all MRP requirements, 4) updated the City's BIP by July 30th, including requirements set forth in the Notice of Violation received by the Water Board in the May 2017 notice 5) participated in the April 25, 2017 working meeting to update revised BIP/ERP SMCWPPP Templates, and 6) continued to review City business licenses, Google Earth and field inspected to identify businesses not inspected by County Environmental Health (CEH) inspectors but inspected by City staff.

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

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

The City currently has a San Mateo County Environmental Health (CEH) agreement to perform stormwater inspections. The City has previously supplemented CEH's list of facilities, with non-retail food and non-hazmat facilities located in East Palo Alto deemed to merit stormwater inspections. The City's updated ERP indicates that the City will become fully responsible for all MRP related inspections beginning FY 17/18. However, upon receipt of the Notice of Violation pertaining to roles and responsibilities and tracking of business inspections, and to ensure stormwater compliance with FY 16/17, the City has conducted stormwater inspections for all businesses that require stormwater inspections in which case SMCEH has reported on some businesses that the City also inspected during FY 16/17, but the City will only report on inspections conducted by City staff for FY 16/17 and going forward.



<b>C.4.d.iii.(2)(a) &amp; (c) ▶ Facility Inspections</b>		
Fill out the following table or attach a summary of the following information. Indicate your reporting methodology below.		
<input type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges as one enforcement action.	
<input type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.	
	<b>Number</b>	<b>Percent</b>
Total number of inspections conducted (C.4.d.iii.(2)(a))	<b>33</b>	
Number of enforcement actions or discrete number of potential and actual discharges	<b>16</b>	
Violations Enforcement actions or discrete number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(2)(c))	<b>15</b>	<b>94%</b>
Comments: <b>There has been a single enforcement action that remains unresolved. This matter pertains to one automotive site that had continuously been washing vehicles outdoors. Site has a treatment trench since 2008, and the final resolution requires O&amp;M Agreement to be recorded for the site. There are some concerns about address/APN/legal description of property being in agreement. Once this is resolved, site is in compliance. No discharge is ongoing. The City is no longer reporting on SMCEH inspections and has already started overlapping inspections with CEH beginning 2016/2017 and will continue to conduct inspections in the future without reporting SMCEH inspection.</b>		

<b>C.4.d.iii.(2)(b) ▶ Frequency and Type of Enforcement Conducted</b>		
Fill out the following table or attach a summary of the following information.		
	<b>Enforcement Action</b> (as listed in ERP) <sup>51</sup>	<b>Number of Enforcement Actions Taken</b>
Level 1	<b>Verbal Warning / Written Notice/Minor Violation—Return to Compliance</b>	<b>10</b>
Level 2	<b>Warning Notice or Administrative Action or Stop Work Notice</b>	<b>6</b>
Level 3	<b>Administrative Action with Penalty and/or Cost Recovery</b>	<b>0</b>
Level 4	<b>Legal Action</b>	<b>0</b>
<b>Total</b>		<b>16</b>

<sup>51</sup>Agencies 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 <sup>52</sup>	Number of Actual Discharges	Number of Potential Discharges
Automotive (may be home based)	0	0%
Mobile Business/Home Based (not automotive)	0	0%
Light Industrial	1	3%
Food, Health, Restaurant or Market	0	0%

**C.4.d.iii.(2)(e) ► Non-Filers**

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

--

**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
ERP and BIP Training	9/12/2016 11/8/2016 2/6/2017 5/5/2017 6/20/2017	Enforcement Response Plan and Business Inspection Plan, pre and post-annual inspections, topics that are related to enforcement procedures, NOV, and updates to both documents.	4	100	4	100
Automotive Inspections	10/10/2016 3/29/2017 4/21/2017 6/12/2017	Various case studies for automotive facilities from repair shops to retail shops—ensuring no stormwater pollution potential.	4	100	4	100
All CII Inspection	1/23/2016 6/19/2017	Various topics that the code enforcement and inspection officer for public works request, along with code enforcement meetings.	4	100	4	100

<sup>52</sup>List your Program's standard business categories.

Comments: **These reported trainings were all conducted in-house. Staff also attended SMCWPPP training opportunities and National SWPPP training. After all training, at the end of the year, two of the three officers trained are moving on to other jurisdictions and we will have one of the 3 trained CE officers remaining. Our public works inspector will also remain, for a 50% retention rate.**

**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:

**In FY 2016/2017, the City participated in the SMCWPPP CII Subcommittee. Generally the primary illicit discharges that were observed had to do with illegal dumping of solid and human waste, as reported herein. Residents call any number in the City and each call is directed to our front desk for appropriate call direction to the appropriate person. This system will be revised in FY17/18 as a new program for illicit discharge and detection will be implemented to coincide with updated solid waste management programs, based on a new Clean City Plan going to City Council on October 3, 2017 for consideration, and funded on May 23, 2017. Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 16-17 Annual Report for description of activities at the countywide or regional level.**

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

Summary of any changes made during FY 16-17:

**All calls are directed to our main line at 650-853-3185 during regular office hours. If the incident is an emergency, calls go to 9-1-1 (for a crime in progress) or requires referral to Police Dispatch, calls are directed to the 650-321-1112 non-emergency dispatch.**

**C.5.d.iii.(1)-(3) ► Spill and Discharge Complaint Tracking**

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

	Number	Percentage
Discharges reported (C.5.d.iii.(1))	12	
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(2))	0	
Discharges resolved in a timely manner (C.5.d.iii.(3))	12	100

Comments:

**These items represent mostly illegally dumped hazardous waste and concrete that residents of staff report. In times where photos are taken, there is not enough evidence considered for prosecution. Already in FY 17/18, we are receiving substantial complaints pertaining to human waste due to no sanitary services around homeless encampments and on streets where RVs are present. This matter is being addressed through a potential ordinance which will restrict oversized vehicles from parking along residential zones or within 500 feet of a residential zone. Oversized vehicles are considered vehicles over 6 feet in height. This type of ordinance, if adopted, will address a majority of the City where parking is permitted. The City**

is also considering regulating illegal dumping more strictly in general, by enacting ordinances that will enable more local enforcement on illegal dumping from motor vehicles.

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

(a) Provide your agency's minimum standards and BMPs for various types of mobile businesses (C.5.e.iii.(1)(a))

**The City of East Palo Alto follows the minimum standards and BMPs described in the “Mobile Businesses - Best Management Practices” brochure developed by the SMCWPPP CII Subcommittee in in March 2015 for the following mobile business categories: automobile washers/detailers, power washers, carpet cleaners, steam cleaners, pet care services. The BMP brochure is included in the Program Annual Report.**

**The City also works with businesses seeking business licenses to become a BASMAA Recognized Mobile Cleaner and follow the BASMAA BMPs available on the website: <http://basmaa.org/Training> . In the event that a mobile business has been noted as a violator, the City is considering having training be an incentive for lessened fees or fines in the future.**

(b) Provide your agency's enforcement strategy for mobile businesses (C.5.e.iii.(1)(b))

**The City receives complaints from the public or during routine field work and will issue enforcement actions and track the activity through the business inspection program.**

**Illicit Discharge Detection and Elimination (IDDE) spill and discharge complaint tracking system according to MRP C.5.d. is reserved for individuals without businesses, who are conducting activities outside of the MRP compliance, or instances when an offending business cannot be identified for responsibility.**

**Enforcement actions stormwater inspectors may take are detailed in our Enforcement Response Plan (ERP). Due to the unique nature of mobile businesses it can be difficult to track enforcement of a single business across jurisdictions. The current strategy is for agencies to share information on mobile business enforcement actions with the SMCWPPP CII Subcommittee facilitator. The Subcommittee facilitator periodically updates the Mobile Business Enforcement Information table that resides on the members only section of the Program’s website ([flowstobay.org](http://flowstobay.org)).**

(c) Provide a list and summary of the specific outreach events and education conducted by your agency to the different types of mobile businesses operating within your jurisdiction (C.5.e.iii.(1)(c))

**The Program developed a regional inventory of mobile businesses in the standard BMP categories listed in the “Mobile Businesses – Best Management Practices” brochure. The BMP brochure and a transmittal letter were mailed to the business. The Mobile Cleaner Businesses BMP brochure is posted on the SMCWPPP website. The CII Subcommittee also worked with the PIP Subcommittee to send outreach messages through social media. These activities are discussed in the SMCWPPP FY16-17 Annual Report.**

Permittee Name: **City of East Palo Alto**

<p>(d) Provide number of inspections conducted at mobile businesses and/or job sites in 2016-2017 (C.5.e.iii.(1)(d)):</p>	<p><b>4</b></p>
<p>(e) Discuss enforcement actions taken against mobile businesses in 2016-2017 (C.5.e.iii.(1)(e))  <b>Enforcement actions are typically taken in response to a complaint or illicit discharge through our IDDE Program or business inspection program. Enforcement actions are tracked in the city's regular code enforcement database under Code Enforcement (CE) prefix. required by MRP C.5.d.ii and also double tracked through our Business Inspection Program. There were no enforcement activities taken against mobile businesses this year. All businesses are also reported under our business inspection program (double reported).</b></p>	
<p>(f) List below or attach the list of mobile businesses operating within your agency's jurisdiction (C.5.e.iii.(1)(f))  <b>In FY16-17 the CII Subcommittee requested the Program compile a regional inventory of mobile businesses located in San Mateo County. The inventory was developed from individual city lists and internet searches of Google, Yelp! and yellow pages. The inventory includes automotive washing, steam cleaning and carpet cleaning mobile businesses. The inventory will be periodically updated with mobile businesses stormwater inspectors observe during routine field activities. The inventory is available to all Co-permittees on the members only webpage of the SMCWPPP website. The inventory is included in the SMCWPPP FY16-17 Annual Report.</b></p>	
<p>(g) Provide a list and summary of the county-wide or regional activities conducted, including sharing of mobile business inventories, BMP requirements, enforcement action information, and education (C.5.e.iii.(1)(g))</p>	
<p><b>Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 16-17 Annual Report for description of activities at the countywide or regional level.</b></p>	

Section 6 – Provision C.6 Construction Site Controls

<b>C.6.e.iii.(3)(a)-(d) ▶ Site/Inspection Totals</b>			
<b>Number of active Hillside Sites (sites disturbing &lt; 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.(3)(a))</b>	<b>Number of High Priority Sites (sites disturbing &lt; 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.(3)(c))</b>	<b>Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.(3)(b))</b>	<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))</b>
<b># 0</b>	<b># 1</b>	<b># 1</b>	<b># 8</b>
<p>Comments:</p> <ol style="list-style-type: none"> <li>1) The City conducted monthly (at a minimum) ongoing stormwater compliance inspections for the Sobrato project, working closely with the project lead and QSD to continuously update and ensure the site was in compliance with the ongoing requirements. This site was generally quite clean and continued to provide ongoing BMP maintenance. There was one verbal notice to remove litter, but otherwise the site was consistently clean as they finalized this project.</li> <li>2) The City also conducted inspections for the Bay Road utilities undergrounding project, a Capital Improvement Project for the City, which required dewatering in soil that is known to be contaminated with various pollutants. This site received three illicit discharges, due to three separate incidents of discharge of dewatering material onto a private property. This project was subject to fines and penalties associated with the violations.</li> </ol>			

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

	Enforcement Action (as listed in ERP) <sup>53</sup>	Number Enforcement Actions Issued
Level 1 <sup>54</sup>	Verbal Warning / Written Notice/Minor Violation—Return to Compliance	1
Level 2	Warning Notice or Administrative Action or Stop Work Notice	1
Level 3	Administrative Action with Penalty and/or Cost Recovery	2
Level 4	Legal Action	0
<b>Total</b>		<b>4</b>

**C.6.e.iii.(3)(f) ▶ Illicit Discharges**

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

**C.6.e.iii.(3)(g) ▶ Corrective Actions**

Indicate your reporting methodology below.	
<input checked="" type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges as one enforcement action.
<input type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.
	Number
<b>Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered</b> or otherwise considered corrected in a timely period (C.6.e.iii.(3)(g)).	<b>3</b>
<b>Total number of enforcement actions or discrete potential and actual discharges for the reporting year</b>	<b>3</b>
<b>Comments:</b> <b>All matters were resolved within a timely manner.</b>	

<sup>53</sup>Agencies should list the specific enforcement actions as defined in their ERPs.

<sup>54</sup>For example, Enforcement Level 1 may be Verbal Warning.

**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: **The City has a team that is willing and trained to escalate enforcement, even for our own contractors, to prevent that pollution will enter the local waterways or be discharged onto private property. Due to the intensity of contamination in certain areas of the City, there is a higher scrutiny on the potential for pollution, and staff is keeping their observations to a peak when a construction project is underway. The City is finding that contractors that regularly work in the Bay Area are found to be more readily in compliance than contractors that are not from the Bay Area and may not be as familiar with BMP practices, and do not understand why it is not allowed to dewater onto property of their preference.**

**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 16/17, East Palo Alto 1) revised operating procedures and provided training to inspectors; 2) ensured all construction inspectors and Code Enforcement Officers received National SWPPP Training; 3) participated in the SMCWPPP New Development Subcommittee.**

**C.6.f.iii. ► Staff Training Summary**

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance
<b>SMCWPPP Construction Stormwater Inspector Training</b>	<b>2/1/2017</b>	<b>Construction inspections, BMPs, SWTMs Installation</b>	<b>2</b>
<b>National SWPPP Training</b>	<b>3/8/2016</b>	<b>SWPPP Training for Construction General Permit</b>	<b>5</b>
<b>Ongoing Inspections</b>	<b>Monthly</b>	<b>Internal training at inspection site/construction</b>	<b>2</b>



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

**C.7.b.i.(1) ► Outreach Campaign**

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

Summary:

[See Section 7 and Section 9 of the SMCWPPP FY 16-17 Annual Report for a description of activities conducted at Countywide level.](#)

**C.7.c. ► Stormwater Pollution Prevention Education**

[No Change.](#)

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

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

[See the C.7 Public Outreach and Citizen Involvement Events section of SMCWPPP FY 16-17 Annual Report for a summary of activities.](#)

Event Details	Description (messages, audience)	Evaluation of Effectiveness
Earth Day	About 8 dozen people participated in Earth Day, learning about the watershed, and potential pollutants. The Mayor provided an overview of topics that residents can conduct to ensure that the waterways are clean. The event was located at Cooley Landing, a Bayfront park.	The program was a success because many residents raved about the event which also included a local band. The amount of materials that were taken included less toxic household cleaning products, and OWOW outreach about cockroaches and ants, which were popular with guests.
Clean Zones	An average of 20-30 residents continue to converge each month to an area of their choosing to clean up the City by removing litter in areas identified by the community as heavily polluted. This monthly activity is managed through the Police Department through a local grant. Local organizations can earn a stipend for participation, which is usually between \$150-\$300, depending on the size of the group. These funds can be used at the group's discretion. During these Clean Zone events, residents are provided with outreach about solid waste service and educated about illegal dumping of household materials and litter.	This program is quite effective, and gaining in popularity. The City's goal is that there will be more publicity for this program because it is so effective at educating and engaging the community. Publication of this information has been luke-warm due to unsure funding. The City hopes to have a secure funding source to provide these monthly cleanup stipends in the future. Residents distribute information about appropriate solid waste disposal, information about healthy alternatives to chemicals including cleaning products and pest management. All age groups are welcome and these events tend to attract ages 8 months to 80 years old.

**C.7.e. ► Watershed Stewardship Collaborative Efforts**

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

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:

[See the C.7 Watershed Stewardship Collaborative Efforts section of SMCWPPP FY 16-17 Annual Report for a summary of activities.](#)

**C.7.f. ► School-Age Children Outreach**

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment. Use the following table for reporting school-age children outreach efforts.

[See the C.7 School-Age Children Outreach section of SMCWPPP FY 16-17 Annual Report for a summary of activities.](#)

[The following activities all occurred at the City's environmental education center: Cooley Landing located at 2100 Bay Road surrounded by SF Bay.](#)

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Provide the following information: Name <a href="#">Grassroots Ecology</a> Grade or level (elementary/ middle/ high) <a href="#">3-5</a>	<a href="#">Brief description, messages, methods of outreach used</a> <a href="#">Message is about watershed health, including native plantings, biology/microscope use of local water observations, art, etc.</a>	<a href="#">200+annually</a>	<a href="#">Staff indicate this is a wildly popular program that allows for field trips and after school and weekend cleanup events according to funding. The City is considering a joint agreement with this non-profit to continue and expand existing programs.</a>
Provide the following information: Name <a href="#">Linda Gass</a> Grade or level (elementary/ middle/ high) <a href="#">all ages</a>	<a href="#">Outreach about the original Bay shoreline, native plants, and cleanup activities as needed to plant vegetation along the estimated original San Francisco Bay shoreline, prior to infill.</a>	<a href="#">200+annually</a>	<a href="#">Staff indicate this was a wildly popular program that allows activities for people who are artistically inclined, as well as naturalists. Provided a venue to enable residents to understand this historical space at Cooley Landing.</a>
Provide the following	<a href="#">Brief description, messages, methods of</a>	<a href="#">200+annually</a>	<a href="#">Staff indicate this was a wildly popular program that</a>

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**C.7 – Public Information and Outreach**

**Permittee Name: City of East Palo Alto**

<p>information: Name <b>City of Palo Alto</b> Grade or level (elementary/ middle/ high) <b>3-5</b></p>	<p><b>outreach used</b> <b>Message is about watershed health,</b> <b>including native plantings,</b> <b>biology/microscope use of local water</b> <b>observations, art, etc.</b></p>		<p><b>allows for field trips and after school and weekend</b> <b>educational events according to funding. The City</b> <b>of Palo Alto was using the City's education center</b> <b>for a short time and provided environmental</b> <b>stewardship activities according to an agreement</b> <b>for facility use.</b></p>
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**Section 9 – Provision C.9 Pesticides Toxicity Controls**

<b>C.9.a. ► Implement IPM Policy or Ordinance</b>							
Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?				<input checked="" type="checkbox"/> <b>X</b>	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.							
<b>Trends in Quantities and Types of Pesticide Active Ingredients Used<sup>55</sup></b>							
Pesticide Category and Specific Pesticide Active Ingredient Used	Amount <sup>56</sup>						
	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	
<b>Organophosphates</b>	None	None					
Active Ingredient Chlorpyrifos	None	None					
Active Ingredient Diazinon	None	None					
Active Ingredient Malathion	None	None					
<b>Pyrethroids (see footnote #57 for list of active ingredients)</b>	None	None					
Active Ingredient Type X	None	None					
Active Ingredient Type Y	None	None					
<b>Carbamates</b>	None	None					
Active Ingredient Carbaryl	None	None					
Active Ingredient Aldicarb	None	None					
<b>Fipronil</b>	None	None					
<b>Indoxacarb</b>	Reporting not required in FY 15-16	None					

<sup>55</sup>Includes all municipal structural and landscape pesticide usage by employees and contractors.

<sup>56</sup>Weight or volume of the active ingredient, using same units for the product each year. Please specify units used. The active ingredients in any pesticide are listed on the label. The list of active ingredients that need to be reported in the pyrethroids class includes: metofluthrin, bifenthrin, cyfluthrin, beta-cyfluthrin, cypermethrin, deltamethrin, esfenvalerate, lambda-cyhalothrin, and permethrin.

<b>Diuron</b>	Reporting not required in FY 15-16	None				
<b>Diamides</b>	Reporting not required in FY 15-16	None				
<b>Active Ingredient Chlorantraniliprole</b>		None				
<b>Active Ingredient Cyantraniliprole</b>		None				
<p>The City has started to implement the following IPM Tactics and Strategies beginning FY 16/17:</p> <ul style="list-style-type: none"> <li>• Use of non-chemical strategies such as monitoring, mowing weeds, mulching.</li> <li>• Removal of plants that require frequent pesticide applications.</li> <li>• Replacing invasive plants with natives.</li> <li>• Preventive actions such as sealing holes and gaps in structures, improving sanitation.</li> <li>• Use of baits and traps instead of broadcast pesticides</li> <li>• Use Roundup ProMax (Glycophosphate) as a last resort pesticide.</li> </ul>						

<b>C.9.b. ► Train Municipal Employees</b>	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	<b>7</b>
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	<b>7</b>
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.	<b>3</b>
Type of Training: <b>SMCWPPP Landscape IPM Training held on March 8, 2017, PAPA Seminar, and local tailgate training</b>	

<b>C.9.c. ► Require Contractors to Implement IPM</b>				
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><b>Simply following the above efforts of updating the IPM contract, requesting and reviewing the active ingredients and quantities of pesticides applied has resulted in the contractor reducing the amount of pesticide and finding alternative means of eliminating pests with controls that are not listed as hazardous.</b></p>				

<b>C.9.d. ► Interface with County Agricultural Commissioners</b>				
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><b>If yes, summarize the communication. If no, explain.</b></p> <p><b>See Section 9 of the SMCWPPP FY 16-17 Annual Report for summary of communication with the San Mateo County Agricultural Commissioner. The City reports directly to County Ag and must receive ongoing regulation for any applications, including Roundup Pro Max.</b></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 checked="" type="checkbox"/>	Yes	<input 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> <p><b>The City received a report that pest controls were being applied without proper notification to residents. This incident was referred to SMC Ag. Commissioner for follow-up and investigation. An investigation ensued and resulted in ongoing caution with this applicator, wherein the owner who contracted with this company subsequently changed companies to utilize IPM controls instead.</b></p>				

<b>C.9.e.ii.(1) ► Public Outreach: Point of Purchase</b>	
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); <b>OR</b> reference a report of a regional effort for public outreach in which your agency participates.	
<p>Summary:</p> <p><b>See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 16-17 Annual Report for information on point of purchase public outreach conducted countywide and regionally.</b></p>	

**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 the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 16-17 Annual Report for a summary of public outreach to residents who hire pest control and landscape professionals.](#)

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

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

Summary:

[See the C.9 Pesticides Toxicity Control section of SMCWPPP FY 16-17 Annual Report for a summary of outreach to pest control operators and landscapers to reduce pesticide use.](#)

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

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

Summary:

[During FY 16-17, we participated in regulatory processes related to pesticides through contributions to the Program, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.](#)



**Section 10 - Provision C.10 Trash Load Reduction**

<b>C.10.a.i ► Trash Load Reduction Summary</b>	
<p>For population-based Permittees, provide the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the reduction percentage on the information presented in C.10.b i-iv and C.10.e.i-ii. Provide a discussion of the calculation used to produce the reduction percentage, including whether the 70% mandatory trash load reduction deadline was attained. If not attained, attach and include reference to a Plan to comply with the deadline in a timely manner, which should include the Permittee's plan and schedule to install full capture systems/devices.</p>	
<b>Trash Load Reductions</b>	
Percent Trash Reduction in All Trash Management Areas (TMAs) due to <b>Trash Full Capture Systems</b> (as reported C.10.b.i)	4.4%
Percent Trash Reduction in all TMAs due to <b>Control Measures Other than Trash Full Capture Systems</b> (as reported in C.10.b.ii) <sup>57</sup>	35.3%
Percent Trash Reduction due to <b>Jurisdictional-wide Source Control Actions</b> (as reported in C.10.b.iv) <sup>1</sup>	10.0%
<b>SubTotal for Above Actions</b>	<b>49.7%</b>
<b>Trash Offsets (Optional)</b>	
Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	<b>10%</b>
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	<b>0%</b>
<b>Total (Jurisdictional-wide) % Trash Load Reduction in FY 16-17</b>	<b>59.7%</b>
<p><b>Discussion of Trash Load Reduction Calculation and Attainment of the 70% Mandatory Deadline:</b>  <b>The City reported a 29% trash load reduction in its FY 15-16 Annual Report. Because the City did not achieve the non-mandatory performance guideline of 60% by July 1, 2016, a Trash Action Plan was prepared and submitted to the Water Board to document the description and schedule of additional trash load reduction control actions that would be implemented to attain and exceed the required 70% percent reduction by July 1, 2017. During FY 16-17, the City began implementing the action plan and increased its load reduction to 50%. Descriptions of the actions taken to-date to reduce trash in the City are summarized in this section of the annual report. Methods used to calculate the reduction are consistent with the methods described in the MRP.</b></p> <p><b>Consistent with MRP provision C.10.f.v.b, the City has attached a report in that section of this annual report, which describes actions to comply with the mandatory reduction deadlines in a timely manner. The report includes a plan and schedule for implementation of full capture systems sufficient to attain the required 70% reduction.</b></p>	

<sup>57</sup> See Appendix 10-1 for changes between 2009 and FY 16-17 in trash generation by TMA as a result of Full Capture Systems and Other Measures.

<b>C.10.a.iii ► Mandatory Trash Full Capture Systems</b>		
Provide the following:		
1) Total number and types of full capture systems (publicly and privately-owned) installed prior to FY 16-17, during FY 16-17, and to-date, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3.		
2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for non-population based Permittees compared to the total required by the permit.		
<b>Type of System</b>	<b># of Systems</b>	<b>Areas Treated (Acres)</b>
<b>Installed Prior to FY 16-17</b>		
Connector Pipe Screens (Public)	38	55.6
<b>Installed in FY 16-17</b>		
None	NA	NA
<b>Total for all Systems Installed To-date</b>		38
<b>Treatment Acreage Required by Permit (Population-based Permittees)</b>		18
<b>Total # of Systems Required by Permit (Non-population-based Permittees)</b>		N/A

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

Provide the following:

- 1) Jurisdiction-wide trash reduction in FY 16-17 attributable to trash full capture systems implemented in each TMA;
- 2) The total number of full capture systems installed to-date in your jurisdiction;
- 3) The percentage of systems in FY 16-17 that exhibited significant plugged/blinded screens or were >50% full when inspected or maintained;
- 4) A narrative summary of any maintenance issues and the corrective actions taken to avoid future full capture system performance issues; and
- 5) A certification that each full capture system is operated and maintained to meet the full capture system requirements in the permit.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or >50% full in FY 16-17	Summary of Maintenance Issues and Corrective Actions
1	4.4%	<b>38</b>	<b>29%</b>	<b>Grit, Dirt, single use food containers, residential trash,</b>
2	0.0%			
3	0.0%			
4	0.0%			
5	0.0%			
6	0.0%			
7	0.0%			
8	0.0%			
<b>Total</b>	<b>4.4%</b>			

**Certification Statement:**

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

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

<b>C.10.b.ii ► Trash Reduction – Other Trash Management Actions (PART A)</b>	
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.	
<b>TMA</b>	<b>Summary of Trash Control Actions Other than Full Capture Systems</b>
1A	These areas are treated with small full trash capture devices in inlets, Connector Pipe Screens, which are cleaned twice a year and when the devices are more than 50% full. Future efforts are likely to remove the small full trash capture devices in lieu of installing a large scale device at the end of the O'Connor Watershed, which serves this TMA, along with about 70% 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, 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, 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, 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 is piling up on the street, and human waste is becoming a possible public health issue.
2	This TMA does not currently have street sweeping signage to restrict parking during street sweeping hours. This will be a future effort for stormwater enhancements. 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. Efforts have 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 management with fines and penalties for noncompliance.
4	This TMA refers to schools. 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, 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 to the addressing homeless encampments, RVs and oversized vehicle

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

	parking in this area. 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 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.

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

**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 their
- **Partial Capture Devices:** The City of East Palo Alto installed a fence/banister/flood control wall along the San Francisquito Creek which has provided a substantial reduction in directly deposited litter and trash, which has subsequently preventing hundreds of gallons of trash from entering the waterways by restricting direct access into the San Francisquito Creek. While this was not the primary function of this flood control wall, it has reduced the trash load at the City’s trash hot spot tremendously and has also provided enhanced understanding of the amount of litter entering the San Francisquito Creek via stormdrain outfalls from City Streets.
- **Storm Drain Inlet Cleaning:** When the City incorporated, the stormdrain system was poorly maintained. Since the MRP 1.0, the City has been maintaining all stormdrain inlets with the Maintenance Staff under the Public Works Division. Materials are removed with a 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 16/17, 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. Materials removed were dewatered and settled a bin with effluent sent to the sanitary district for appropriate treatment (without solids).

- **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 will expand this effort to begin fines and penalties when specific vehicles are not addressing the issue.
- **Anti-littering and illegal dumping enforcement activities:** During the term of MRP 1.0, the City has worked on a number of fronts to address illegal dumping and littering. Illegal dumping is tracked by complaint via a single contact point—the Maintenance Division’s receptionist—who takes each call and tracks it via spreadsheet, sends a copy to the City’s franchise hauler, Recology, who picks up the materials within 24 hours. The City Council has received annual updates regarding the cost of this service to the community, close to \$100,000. The City has attempted to hold those accountable when the illegal dumping has personal identification, however, unless there are photos or videos that indicate the person who actually deposited the materials, no prosecution is possible. To date, the City has not had any successful prosecutions of illegal dumping. The problem is on the rise. In 2014/15, there were over 700 cases of reported illegal dumping. During FY 15/16, there were over 1,000 reports of illegal dumping. This information is tracked through Recology, who provides reports to the City as part of the Franchise Agreement.

Anti-littering has also been a focus for the community during the MRP 1.0 permit term. Primary activities have focused on providing clean-up events, encouraging volunteer engagement, and providing classroom education on the issue of illegal dumping and littering at the 3<sup>rd</sup> and 5<sup>th</sup> 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 FY16/17, the City has prepared a Solid Waste Management Program, with City Council support, which includes a 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 begin to address the source of many illegal dumping issues: tenants and businesses who lack access to adequate trash service.

- **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 FY16/17, the City has prepared a Solid Waste Management Program, with City Council support, which includes a Clean City Plan to address activities associated container management. It is anticipated that this expanded program, which will include new part time staff members, will begin to address the source of many overflowing bin issues: tenants and businesses who lack access to adequate trash service. It is anticipated that in FY 17/18, access to adequate sized bins will greatly reduce the quantity of trash that makes its way to the local streets and waterways.

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

Provide the following:

- 1) A summary of the on-land visual assessments in each TMA (or control measure area), including the street miles or acres available for assessment (i.e., those associated with VH, H, or M trash generation areas not treated by full capture systems), the street miles or acres assessed, the % of available street miles or acres assessed, and the average number of assessments conducted per site within the TMA; and
- 2) Percent jurisdictional-wide trash reduction in FY 16-17 attributable to trash management actions other than full capture systems implemented in each TMA.

TMA ID <i>or (as applicable)</i> Control Measure Area	Total Street Miles <sup>58</sup> or Acres Available for Assessment	Summary of On-land Visual Assessments <sup>59</sup>			Jurisdictional-wide Reduction (%)
		Street Miles or Acres Assessed	% of Applicable Street Miles or Acres Assessed	Average # of Assessments Conducted at Each Site <sup>60</sup>	
<b>1</b>	13.06	1.77	13.56%	6.3	19.4%
<b>2</b>	7.92	1.04	13.15%	3.0	6.5%
<b>3</b>	0.78	0.39	49.86%	2.0	4.7%
<b>4</b>	0.94	0.20	21.85%	3.0	0.0%
<b>5</b>	4.36	0.60	13.83%	2.7	2.1%
<b>6</b>	3.13	0.36	11.56%	2.0	1.9%
<b>7</b>	0.79	0.38	47.41%	3.0	0.7%
<b>8*</b>	0.00	NA	NA	NA	NA
<b>Total</b>	<b>4.75</b>	<b>4.75</b>	<b>-</b>	<b>-</b>	<b>35.3%</b>

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

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

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

<sup>60</sup> Each assessment site is roughly 1,000 feet in length.



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

Provide a description of each jurisdictional-wide trash source control action implemented to-date. For each control action, identify the trash reduction evaluation method(s) used to demonstrate on-going reductions, summarize the results of the evaluation(s), and estimate the associated reduction of trash within your jurisdictional area. Note: There is a maximum of 10% total credit for source controls.

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction	Total Reduction Credit (%)
Single Use Bag Ordinance	The City Council adopted the San Mateo County Reusable Bag Ordinance on April 19, 2012 for implementation October 1, 2012. This prohibits the distribution of single-use plastic bags and requires a \$0.10 fee be assessed for paper or heavy plastic bags.	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%	10.0% (Maximum)
Expanded Polystyrene Food Service Ware Ordinance	No such ban	No such ban	No such ban	No such ban	

**C.10.c ► Trash Hot Spot Cleanups**

Provide the FY 16-17 cleanup date and volume of trash removed during each MRP-required Trash Hot Spot cleanup during each fiscal year listed. Indicate whether the site was a new site in FY 16-17.

Trash Hot Spot	New Site in FY 16-17 (Y/N)	FY 16-17 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2012-13	FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17
EPA01	N	05/20 /2017 09/17/2016	1.6	3.6	2.4	0.6	0.1
EPA02	YES	05/20 /2017 09/17/2016	n/a	N/a	n/a	n/a	1.5

<b>C.10.d ► Long-Term Trash Load Reduction Plan</b>	
<p>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.</p>	
<b>Description of Significant Revision</b>	<b>Associated TMA</b>
<p>In FY 15-16, consistent with all MRP Permittees, all public K-12 schools, college and university parcels were made non-jurisdictional on the City's baseline trash generation maps. Under California Government Code Sections 4450 through 4461, the construction, modification, or alternation of facilities and/or structures on these parcels are under the jurisdiction of the California Division of State Architect and not the City. The public right-of-way (e.g., streets and sidewalks) surrounding these parcels remain as jurisdictional on the City's baseline trash generation maps. The City's revised baseline trash generation map is included as Appendix 10-2.</p>	<p>All applicable</p>
<p><b>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.</b></p>	<p><b>1A, 1C, 1D, portions of 2, 3, 4, 5, 6, and 8</b></p>
<p><b>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.</b></p>	<p><b>1B</b></p>
<p><b>This TMA 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.</b></p>	<p><b>2</b></p>
<p><b>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.</b></p>	<p><b>7</b></p>

**C.10.e. ► Trash Reduction Offsets (Optional)**

Provide a summary description of each offset program implemented, the volume of trash removed, and the offset claimed in FY 16-17. Also, for additional creek and shoreline cleanups, describe the number and frequency of cleanups conducted, and the locations and cleanup dates. For direct discharge control programs approved by the Water Board Executive Officer, also describe the results of the assessments conducted in receiving waters to demonstrate the effectiveness of the control program. Include an Appendix that provides the calculations and data used to determine the trash reduction offset.

Offset Program	Summary Description of Actions and Assessment Results	Volume of Trash (CY) Removed/Controlled in FY 16-17	Offset (% Jurisdiction-wide Reduction)
<p><b>Additional Creek and Shoreline Cleanups (Max 10% Offset)</b></p>	<p><b>Clean Zones: community members' cleanup around the City to address litter problems. They receive a stipend from the Police Department for litter control efforts. There have been roughly 275 volunteers participating in this cleanup effort, removing roughly 20 cubic yards year round from the city streets associated with illegal dumping of various types of litter and encampment types of waste.</b></p> <p><b>Cleanups were focused in areas noted in the description in TMA discussion.</b></p> <p><b>TMA #7:</b></p> <p><b>The City, working with a major land owner, managed to permanently eradicate a major homeless encampment, through working with 1) community service agencies to provide any of the permanent camp dwellers with options to receive needed services, 2) require through code enforcement efforts and penalties cleanup and removal of all debris associated with the encampments, and 3) permanently address access to the site with structural controls and ongoing maintenance to prevent access to these isolated areas. Four years in the making, the City worked with these individuals (there were over 40 present at the peak encampment size), until there were 17 people living in this area year-round at the time of abatement.</b></p> <p><b>The City would have requested a full assessment, however, as this was conducted by a private entity, tracking all materials was not a luxury the City was able to utilize.</b></p>	<p><b>120 cubic yards (minimum)</b></p>	<p><b>10%</b></p>

<b>C.10.e. ► Trash Reduction Offsets (Optional)</b>			
<p>Provide a summary description of each offset program implemented, the volume of trash removed, and the offset claimed in FY 16-17. Also, for additional creek and shoreline cleanups, describe the number and frequency of cleanups conducted, and the locations and cleanup dates. For direct discharge control programs approved by the Water Board Executive Officer, also describe the results of the assessments conducted in receiving waters to demonstrate the effectiveness of the control program. Include an Appendix that provides the calculations and data used to determine the trash reduction offset.</p>			
<b>Additional Creek and Shoreline Cleanups (Max 10% Offset) (cont'd)</b>	<p><b>Assumptions made in this calculation include: Each person generates roughly 6 pounds of solid waste and 0.75 pounds of human waste (sewage) per day. We are estimating about only ~5 pounds of waste per person, per day, for a total of 85 pounds of trash per day generated from these 17 people (although visual observations tells us these individuals brought more waste than the average person generates), all of which was readily was distributed directly into the local waterway at the edge of this soil mound.</b></p> <p><b>This is ~31,025 pounds of trash that was being readily distributed by wind and water (including raw sewage) directly into the San Francisco Bay.</b></p> <p><b>With about 175 pounds per yard, this represents about 177 cubic yards per year that have ceased direct discharge into the San Francisco Bay.</b></p> <p><b>We are taking credit for 100 cubic yards of this very conservatively estimated waste that was eliminated.</b></p> <p><b>Further, within San Francisquito Creek, about five encampments which had been fairly permanent settlements, have been completely eliminated. We are not taking credit for this due to the fact we've already taken maximum credit for this effort in this section.</b></p>		
<b>Direct Trash Discharge Controls (Max 15% Offset)</b>			<b>0</b>

### C.10.f.v.b

As provided in the most recent update provided to Water Board Staff on April 30, 2017 and consistent with MRP provision C.10.f.v.b, the City has attached this report to describe actions to comply with the mandatory reduction deadlines in a timely manner.

As previously noted in the FY 15/16 Annual Report and Amended Long Term Trash Load Reduction Plan, the City of East Palo Alto's previously implemented structural controls and soft mechanisms noted in the Long Term Trash Load Reduction Plan did not result in adequate reduction to achieve 60% full trash capture equivalency benchmarks set for June 30, 2016. The noted inadequacy is attributed largely to unforeseen negative shifts in the effectiveness of those strategies that were implemented by the City. The LTLRP primarily utilized soft (full trash capture equivalency) mechanisms such as street sweeping, illegal dumping remedies, code enforcement strategies, on-ground cleanups and the minimum required full trash capture infrastructure, for trash load reduction attainment. Over the course of implementation, the City did see trends that suggested the approach would result in full compliance, as noted through assessments revealing reduced trash loads over time. However, in FY 2016, the required ground-truthing assessments indicated substantial variability in the effectiveness of those strategies, with incomplete long term effectiveness.

The City did provide the Water Board with an Updated Trash Control Measure Implementation Schedule in the 2015/2016 Annual Report submittal, which laid the groundwork for shifting focus in the City's Amended Long Term Trash Load Reduction Plan towards utilizing full trash capture infrastructure as the primary means of compliance with MRP 2.0 section C.10, going forward.

Since September 2016, the executive management team and City Council of East Palo Alto have created mechanisms to ensure the City is on track to preclude trash from entering local waterways with structural means. In providing detailed steps that ensure this goal is met, our modest staff has diligently concluded the following tasks since our 2016 Annual Report was submitted:

Amended Long Term Trash Load Reduction Plan with actions that ensure structural full trash capture is the primary tool utilized; this included Public Works and Transportation Commission recommendation, and City Council adoption of said Plan;

Entered into a new contract with enforceable mechanisms to ensure street sweeping is effective and efficient (as a secondary compliance mechanism);

Entered into contract with CSG to conduct a full assessment of the City stormdrain system to prioritize full trash capture locations and provide a conceptual design that meets at a minimum 70% full trash capture; finalized assessment;

Reviewed and approved a conceptual design for a large scale Full Trash Capture project that is estimated to provide a minimum of 70%, and up to 80% full trash capture for the City, with an estimated cost of \$450,000 to retrofit the City's stormdrain system with a large-scale system;

Put forth a Request for Qualifications, reviewed said proposals, and entered into contract with engineering consultants to provide assistance with design and RFP development for concept proposal of the proposed Full Trash Capture project, assessed proposed concepts;

Received a memorandum regarding proposed full trash capture device which determined, based on hydraulic analysis of the proposed full trash capture device within the wet well of the City's only pump station, that the concept proposal is infeasible due to flooding potential during a model 10 year storm event; the City and contractor will to narrow down options to prepare detailed bid and construction documents for a system at the end of the system that does not impact or exacerbate the flooding potential of the community;

Working with the Contractor to fully assess the Runnymede drainage system for full trash capture potential with a concept design for a full trash capture device at the outfall of the O'Connor Pump Station being further considered;

Consultant team has estimated potential construction by summer 2018 for a system which could provide up to 70% full trash capture of the City's watershed.

Continue to detail next steps for additional full trash capture options.

Further, the City anticipates the following schedule will be set forth to obtain full MRP 2.0 compliance with section C.10 (trash) requirements in 2017:

## FY 2016-2017 Annual Report

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

## C.10 – Trash Load Reduction

March 30th: Obtain final design for O'Connor Pump Station and Runnymede Outfall retrofit and release RFP for construction, with an updated schedule for estimated construction dates;

May 30th: Enter into contract for O'Connor Pump Station and Runnymede Outfall Full Trash Capture retrofit; obtain construction schedule with anticipated construction in summer 2018.

As noted, this consolidated timeframe has pushed City of East Palo Alto out of compliance with MRP 2.0 provision to obtain 70% full trash capture equivalency compliance by July 1, 2017. The revised timeframe does ensure the City will obtain structural full trash capture to meet (and likely exceed) MRP compliance targets for 70% and likely 80% full trash capture, without relying on mechanisms that have not proven effective or equivalent to full trash capture, and to ensure the City of East Palo Alto will eliminate litter from entering local waterways en perpetuity.

Should any of the above tasks require additional permits, funding, or review, there is a high likelihood that the timeframe will be pushed out beyond Fiscal Year 2017/2018 and result in compliance being met after the summer of 2018.

The City is hopeful that the Amended Long Term Trash Load Reduction Plan and proposed schedule, noted above, will meet the Water Board's intention of obtaining full trash capture, while ensuring the actions the City is taken are remarkably effective and efficient to address the issue of eliminating trash from entering local waterways.

The City will provide the Water Board with any updates through the upcoming efforts if the schedule should require additional revisions.

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 16-17.<sup>61</sup>

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 16-17 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 16-17 After Accounting for Full Capture Systems and Other Control Measures					Jurisdiction-wide Reduction via Other Control Measures (%)	Jurisdiction-wide Reduction via Full Capture AND Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1	3	20	456	0	<b>480</b>	54	8	418	0	<b>480</b>	<b>4.4%</b>	68	236	176	0	<b>480</b>	<b>19.4%</b>	<b>23.8%</b>
2	1	1	226	0	<b>228</b>	1	1	226	0	<b>228</b>	<b>0%</b>	1	89	136	2	<b>228</b>	<b>6.5%</b>	<b>6.5%</b>
3	0	0	50	0	<b>50</b>	0	0	50	0	<b>50</b>	<b>0%</b>	30	20	0	0	<b>50</b>	<b>4.7%</b>	<b>4.7%</b>
4	0	36	0	0	<b>36</b>	0	36	0	0	<b>36</b>	<b>0%</b>	3	12	21	0	<b>36</b>	<b>0%</b>	<b>0%</b>
5	0	135	28	0	<b>162</b>	0	135	28	0	<b>162</b>	<b>0%</b>	45	102	16	0	<b>162</b>	<b>2.1%</b>	<b>2.1%</b>
6	0	0	116	0	<b>116</b>	0	0	116	0	<b>116</b>	<b>0%</b>	0	36	76	4	<b>116</b>	<b>1.9%</b>	<b>1.9%</b>
7	0	102	0	0	<b>102</b>	0	102	0	0	<b>102</b>	<b>0%</b>	41	57	5	0	<b>102</b>	<b>0.7%</b>	<b>0.7%</b>
8	92	0	0	0	<b>92</b>	92	0	0	0	<b>92</b>	<b>0%</b>	92	0	0	0	<b>92</b>	<b>0%</b>	<b>0%</b>
<b>Totals</b>	<b>97</b>	<b>294</b>	<b>876</b>	<b>0</b>	<b>1,267</b>	<b>148</b>	<b>282</b>	<b>838</b>	<b>0</b>	<b>1,267</b>	<b>4.4%</b>	<b>280</b>	<b>551</b>	<b>430</b>	<b>7</b>	<b>1,267</b>	<b>35.3%</b>	<b>39.7%</b>

<sup>61</sup> Numbers reported for each TMA may not exactly sum to totals due to rounding.



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**

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

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

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

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

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

Section 12 - Provision C.12 PCBs Controls

**C.12.a. ► Implement Control Measures to Achieve PCBs Load Reductions**  
**C.12.b. ► Assess PCBs Load Reductions from Stormwater**

See the Program's FY 2016-17 Annual Report for:

- Documentation of PCBs control measures implemented in our agency's jurisdictional area for which load reductions will be reported and the associated management areas;
- A description of how the BASMAA Interim Accounting Methodology<sup>62</sup> was used to calculate the PCBs load reduced by each control measure implemented in our agency's jurisdictional area and the calculation results (i.e., the estimated PCBs load reduced by each control measure); and
- Supporting data and information necessary to substantiate the load reduction estimates.

If the regional and countywide PCBs load reductions required by C.12.a are not met, will Permittees in your county use the default population-based method to calculate the portion of the countywide load reduction required of each Permittee?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
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**C.12.f. ► Manage PCB-Containing Materials and Wastes During Building Demolition Activities So That PCBs Do Not Enter Municipal Storm Drains**

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

Does your agency plan to seek exemption from this requirement?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
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<sup>62</sup>BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.0. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., September 19, 2016.

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

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

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

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

Section 13 - Provision C.13 Copper Controls

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

Provide summaries of permitting and enforcement activities to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction.

Summary:

[There are no copper architectural features in EPA.](#)

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

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

Summary:

[There are few of these facilities in East Palo Alto with pools, spas and fountains. Such discharges are addressed by the City as illicit discharges, and all of such discharges are required to go through the sanitary sewer when observed.](#)

**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:

[In FY 16/17, no inspections were resulted in a reduction of copper. None of the above sources were noted for discharging](#)

**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 updated our Water Efficiency Landscape Ordinance to require all landscaping that is completed with any type of building permit requires primarily drought tolerant landscaping and no new installation of turf unless proposed for recreational facilities. The City is among the top two Cities in the Bay Area for water conservation, largely due to the high density and lack of commercial facilities, but also due to the price sensitivity of our customers/users. Local nursery retailers are indicating an explosion of interest in drought tolerant plants and vegetation, though the City is only promoting through the customer service line expressing means of reducing the cost of the water bill.**