



**Municipal Regional Permit  
National Pollution Discharge Elimination System  
City of East Palo Alto  
ANNUAL REPORT  
Fiscal Year 2017-2018  
July 1, 2017-June 30, 2018**



# City of East Palo Alto

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## Office of the City Manager

September 28, 2018

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

Subject: **East Palo Alto  
FY 2017/18 Annual Report**

Dear Mr. Wolfe:

This letter and Annual Report with attachments is submitted by the City of East Palo Alto pursuant to Permit Provision C.17.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of compliance activities conducted during FY 2017/18 and related accomplishments.

Please contact Michelle Daher at (650) 853-3197 or [mdaher@cityofepa.org](mailto:mdaher@cityofepa.org) regarding any questions or concerns.

Very truly yours,

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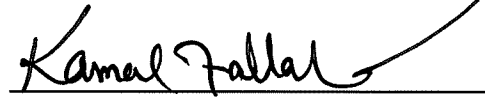
Carlos Martinez  
City Manager

**City of East Palo Alto  
FY 2017/18 ANNUAL REPORT**

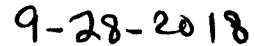
**Certification Statement**

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

**Signature of Duly Authorized Representative:**



Kamal Fallaha



Date

**FY 2017-2018 Annual Report**  
**Permittee Name: East Palo Alto**

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

Background Information					
Permittee Name:	City of East Palo Alto				
Population:	31,000				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2015-0049				
Reporting Time Period (month/year):	July 1, 2017 through June 30, 2018				
Name of the Responsible Authority:	Kamal Fallaha	Title:	Public Works Director		
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3117	Fax Number:	650-853-3179		
E-mail Address:	kfallaha@cityofepa.org				
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle Daher	Title:	Management Analyst: Environmental Programs		
Department:	Community and Economic Development				
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	CA	County:	94025
Telephone Number:	650-853-3197	Fax Number:	650-853-3179		
E-mail Address:	mdaher@cityofepa.org				

Section 2 - Provision C.2 Reporting Municipal Operations

**Program Highlights and Evaluation**

Highlight/summarize activities for reporting year:

Summary:

**During FY 17/18, the City has 1) participated in SMCWPPP’s Municipal Maintenance Subcommittee; 2) prepared for a full trash capture device installation; 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) utilized the SMCWPPP pesticide tracking Excel template for reporting pesticide data management program for use in the reporting period.**

**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:  Yes  No

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

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

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

Comments including listing increased maintenance in priority areas:

<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.



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)			
Place an <b>X</b> in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type <b>NA</b> in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:				
<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment			
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system			
<input checked="" type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method			
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used			
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants			
Comments:				
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	Overflowing HHW; RFP shall be obtained HHW ongoing pickup; also require removal of vehicles that are no longer operational or being used.	8/24/2018	Develop long term HHW disposal plan for pickup of illegal dumping HHW; Continue to obtain pesticide training prior to pesticide applications; Ensure all non-op vehicles that are no longer operational and out of service are removed from site.	As of 6/30, HHW RFP is imminent; Requiring removal of inoperable vehicles throughout the yard. Requires longer than 10 days due to length of process for procurement.

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

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

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

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

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

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

	Yes	X	No
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Comments (optional): **The City of East Palo Alto reserves the option of allowing alternative compliance if there is a lack of feasibility on a site and the alternative compliance (usually in the form of Green Infrastructure) would allow enhanced water quality benefits. This is potentially a need in areas where the ground water table is high and there is a high level of soil and/or groundwater contamination, and flow-through planters along with green infrastructure are not able to achieve the entire mix of LID requirements per C.3. In these cases, the City may allow alternative compliance along the local streets to expand the green infrastructure being installed as part of the project. In such cases, there may be an increase in the green infrastructure beyond the limits of the property boundaries to expand the treatment to the required C.3 treatment area. Further water quality benefits will be obtained in these cases, such as detention to reduce the incidence of peak flooding.**

**C.3.e.v ► Special Projects Reporting**

1. In FY 2017-18, has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii.(2) for any of the three categories of Special Projects (Categories A, B or C)?

	Yes	X	No
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2. In FY 2017-18, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the **C.3.b.iv.(2)** Table, and the **C.3.e.v.** Table.

	Yes	X	No
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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.

**No new stormwater treatment controls were installed in FY 17/18.**

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

<b>Site Inspections Data</b>	<b>Number/Percentage</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 previous fiscal year (FY17-18)	<b>14</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 17-18)	<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 17-18)	<b>4</b>
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 17-18)	<b>29%</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.

**Annual inspection reports from 3rd party inspectors for two vault systems. Inspections of bioretention systems at two facilities.**

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: **Increase frequency of site visits not considered full inspections to observe whether the vegetation is still alive.**

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

Does your agency have an Enforcement Response Plan for all O&M inspections of stormwater treatment measures?  Yes  No

If No, explain:

**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:

Revising initial intake of planning permits to include small project site design and source control elements. Although the City has COAs for this process, upon internal audit, small projects are not having maximized source control/site design elements, but meet minimum standards.

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. As a standard practice, all downspouts are required to be disconnected and discharge into a landscaped area.

#### **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:

All Planning and Engineering staff has been trained in green infrastructure requirements, and at present, all regulated projects sift through an individual person responsible for screening for full compliance of “no missed opportunity” and providing ongoing training on a project-by-project basis. The City has also included familiarity with green infrastructure into the interview process when hiring engineers and planners, to expand the number of staff that is familiar with Green Infrastructure, so that there will ultimately be basic knowledge of GI in all divisions. Once the City is fully staffed, there is a plan to have one member of each division to attend the New Development Subcommittee meetings so that they can enrich their knowledge and collaborate with other municipalities on this topic. The City Manager, Assistant City Manager, Public Works Director, City Engineer, and City's Senior Engineer are all aware of these requirements and working to expand the teams

At each Tuesday Community and Economic Development meeting, all proposed regulated projects are discussed in depth. The City Council has been apprised of the Green Infrastructure requirements at the City's annual Capital Improvements Program wherein funding was set aside by the City Council to complete a Green Infrastructure Plan. This topic was further discussed when the City Council obtained a request for grant acceptance for the City to receive a CalFIRE grant to hire a staff person to develop an Urban Forest Management Plan, which in part will assess the City's canopy to detail where shade trees versus tree well filters will fit into the City's future canopy, with a deliverable to provide design details and protective ordinances to expand the ecological diversity of the City's canopy while meeting

**GI requirements. Small projects may not be maximizing source control and site design elements.**

**Please refer to the SMCWPPP FY 17-18 Annual Report for a summary of outreach efforts implemented at the countywide level.**

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

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

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

**Background Information:**

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

**Refer to BASMAA guidance on identifying and reviewing potential green infrastructure projects. The City is continuously looking for “no missed opportunities” in projects under review. Due to the water connection moratorium, the City has had very minor new or redevelopment. It is anticipated that in FY17/18 there will be a surge of projects that relate to this effort.**

**Summary of Planning or Implementation Status of Identified Projects:**

**Generally, the City is planning on installing green infrastructure projects in the City right of way as part of the Capital Improvement Plan project review as well as part of the review process for private development projects, meeting the no missed opportunities guidance. Due to the ongoing water moratorium wherein no new or expanded water meters are authorized to be installed, the City did not approve any new public or private development projects in FY 17/18, but did lift the water moratorium on July 17, 2018. It is expected that FY 18/19 will see a surge of pent up development and the proponents of projects that were previously under consideration have all been made aware of the “no missed opportunity” provision of incorporating GI into the frontage improvements.**

**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.

**The SMCWPPP FY 17-18 Annual Report summarizes efforts conducted to help regional, State, and federal agencies plan, design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects.**

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

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

**Please refer to the SMCWPPP FY 17-18 Annual Report for a summary of methods being developed to track and report implementation of green infrastructure measures.**

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

Project Name Project No.	Project Location <sup>3</sup> , Street Address	Name of Developer	Project Phase No. <sup>4</sup>	Project Type & Description <sup>5</sup>	Project Watershed <sup>6</sup>	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft <sup>2</sup> ) <sup>7</sup>	Total Replaced Impervious Surface Area (ft <sup>2</sup> ) <sup>8</sup>	Total Pre- Project Impervious Surface Area <sup>9</sup> (ft <sup>2</sup> )	Total Post- Project Impervious Surface Area <sup>10</sup> (ft <sup>2</sup> )
<b>Private Projects</b>											
NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
<b>Public Projects</b>											
NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE	NONE
Comments: <b>No Regulated Projects were approved during the FY 17/18.</b>											

<sup>3</sup>Include cross streets

<sup>4</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>5</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>6</sup>State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

<sup>7</sup>All impervious surfaces added to any area of the site that was previously existing pervious surface.

<sup>8</sup>All impervious surfaces added to any area of the site that was previously existing impervious surface.

<sup>9</sup>For redevelopment projects, state the pre-project impervious surface area.

<sup>10</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>11</sup>	Application Final Approval Date <sup>12</sup>	Source Control Measures <sup>13</sup>	Site Design Measures <sup>14</sup>	Treatment Systems Approved <sup>15</sup>	Type of Operation & Maintenance Responsibility Mechanism <sup>16</sup>	Hydraulic Sizing Criteria <sup>17</sup>	Alternative Compliance Measures <sup>18/19</sup>	Alternative Certification <sup>20</sup>	HM Controls <sup>21/22</sup>
<b>Private Projects</b>										
<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>

<sup>11</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>12</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>13</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>14</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>15</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>16</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>17</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>18</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>19</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>20</sup>Note whether a third party was used to certify the project design complies with Provision C.3.d.

<sup>21</sup>If HM control is not required, state why not.

<sup>22</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>23</sup>	Date Construction Scheduled to Begin	Source Control Measures <sup>24</sup>	Site Design Measures <sup>25</sup>	Treatment Systems Approved <sup>26</sup>	Operation & Maintenance Responsibility Mechanism <sup>27</sup>	Hydraulic Sizing Criteria <sup>28</sup>	Alternative Compliance Measures <sup>29/30</sup>	Alternative Certification <sup>31</sup>	HM Controls <sup>32/33</sup>
<b>Public Projects</b>										
<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>	<b>NONE</b>
Comments: <b>No public projects were approved during the fiscal year reporting period. The City is currently designing a couple of projects that are to be determined.</b>										

<sup>23</sup>For public projects, enter the plans and specifications approval date.

<sup>24</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>25</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>26</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>27</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>28</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>29</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>30</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>31</sup>Note whether a third party was used to certify the project design complies with Provision C.3.d.

<sup>32</sup>If HM control is not required, state why not.

<sup>33</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>34</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>35</sup> For Maintenance	Type of Treatment/HM Control(s)
<b>NO NEW INSTALLATIONS</b>	<b>NO NEW INSTALLATIONS</b>	<b>NO NEW INSTALLATIONS</b>	<b>NO NEW INSTALLATIONS</b>

<sup>34</sup> "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

<sup>35</sup> State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v.Special Projects Reporting Table												
Reporting Period – July 1 2017 - June 30, 2018												
Project Name & No.	Permittee	Address	Application Submittal Date <sup>36</sup>	Status <sup>37</sup>	Description <sup>38</sup>	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category <sup>39</sup>	LID Treatment Reduction Credit Available <sup>40</sup>	List of LID Stormwater Treatment Systems <sup>41</sup>	List of Non-LID Stormwater Treatment Systems <sup>42</sup>
NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS	NO NEW INSTALLATIONS

**Special Projects Narrative**

<sup>36</sup>Date that a planning application for the Special Project was submitted.

<sup>37</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>38</sup>Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

<sup>39</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>40</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>41</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>42</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.

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

Project Name and Location <sup>43</sup>	Project Description	Status <sup>44</sup>	GI Included? <sup>45</sup>	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement <sup>46</sup>
<b>Bay Road Phase II (Pulgas to Cooley Landing)</b>	<b>Installation of new utilities, curb and gutter, sidewalks, and bioretention/tree well filters, where feasible.</b>	<b>Nearing final design. Seeking enhanced funding options.</b>	<b>YES</b>	<b>Tree Well Filters, likely, possibly bioretention. Very costly due to high ground water table and soil contamination. Appears feasible. Requires enhanced funding.</b>
<b>Addison Avenue</b>	<b>Safe Routes To School/Green Infrastructure project, with SMC Funding for GI. Seeking additional funding options to expand project to full length of block between E. Bayshore Rd and Newbridge Ave</b>	<b>Initial Planning phase.</b>	<b>YES</b>	<b>Seeking designs; likely tree well filters with sidewalk grates to incorporate walkability. Scope of project is of yet undetermined.</b>

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

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

<sup>45</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>46</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.

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

Project Name and Location <sup>47</sup>	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Cooley Landing Phgse II	Park roadway improvements included installation of narrow linear bioretention area.	Installed; replanting.	Bioretention/bioswale in narrow park strip between roadway and trail/path. Plants have been overwhelmed with volunteer vegetation. Requires replanting.

<sup>47</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:

1) updating Business Inspection Plans (BIPs), Enforcement Response Plans (ERPs), facilities lists, and inspection frequencies and priorities; 2) conducting inspections; 3) conducting training; and 4) participating in the SMCWPPP Subcommittee. Refer to the C.4. Industrial and Commercial Site Controls section of the SMCWPPP FY 17-18 Annual Report for a description of countywide activities prior to January 2018.

The County of San Mateo Health System (County Environmental Health, or CEH) notified Cities in an April 3, 2017 letter of its intent to terminate stormwater inspection agreements with the 17 Cities on December 31, 2017 due to staffing and cost concerns. As of January 1, 2018, the City is responsible for conducting all stormwater business facility inspections. To reflect the City's current stormwater inspection program, we have updated the City's facilities list, Enforcement Response Plan, and coordination between the City and San Mateo County for a more collaborative effort between inspectors.

The City of East Palo Alto is hiring additional staff and training them to take over the San Mateo County stormwater inspections which has been an ongoing effort since being informed of the County's decision to cease all stormwater inspections. In many prior years the City of East Palo Alto has conducted independent stormwater inspections at facilities also inspected by the County as a means of ensuring local consistency. Due to the high number of illegal dumping and illicit discharge complaints (Section C.5), received in FY 17/18, the capacity was not available to coordinate inspections with San Mateo County, nor meet the goals set forth in the FY 17/18 business inspection plan. Further updates will be necessary to adjust to the sole reliance on local inspections.

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

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

Street Number	Street Name	Name	Site Address
1775	BAYSHORE	TARGET STORE T- 3265	1775 E BAYSHORE RD
1895	BAYSHORE	UNA FIGURA PERFECTA	1895 E BAYSHORE RD #
1933	PULGAS	GARDEN SUPERMARKET	1933 PULGAS AVE
2220	UNIVERSITY	THREE BROTHERS	2220 UNIVERSITY AVE
2086	CLARKE	TACOS BRENTWOOD SCHOOL	2086 CLARKE AVE
2390	CLARKE	TAQUERIA LA CAZUELA	2390 CLARKE AVE
2350	RALMAR	CESAR CHAVEZ ACADEMY	2350 RALMAR AVE
560	BELL	EAST PALO ALTO SENIOR CENTER	560 BELL ST
2150	UNIVERSITY	MI PUEBLITO	2150 UNIVERSITY AVE
77	NEWELL	SEVEN ELEVEN FOOD STORE	77 NEWELL RD
1489	BAYSHORE	EMMANUEL PIZZA & BAKERY INC	1489 E BAYSHORE RD
1905	BAY	CAL SPRAY INC	1905 BAY RD
255	DEMETER	GLOBAL STEEL FABRICATORS, INC.	255 DEMETER ST
1905	BAY	CAL SPRAY INC	1905 BAY RD
255	DEMETER	GLOBAL STEEL FABRICATORS, INC.	255 DEMETER ST
1885	BAY	RAVENSWOOD FAMILY HEALTH	1885 BAY RD
2000	Bay	PG&E: COOLEY LANDING SUBSTATION	2000 Bay Rd
2160	EUCLID	RAVENSWOOD CITY SCHOOL DIST	2160 EUCLID AVE
1900	UNIVERSITY	WELLS REIT II- UNIVERSITY	1900 UNIVERSITY AVE S
150	TARA	EPA CORP YARD	150 TARA ST
2101	University	CHEVRON SERVICE STATION #1081	2101 University Ave
2560	PULGAS	OUR COMMON GROUND	2560 PULGAS AVE
75	DEMETER	J'S PRODUCT PAINTING CO INC	75 DEMETER ST
1045	WEEKS	HEW DRILLING	1045 WEEKS



Street Number	Street Name	Name	Site Address
2535	PULGAS	TOUCHATT TRUCKING	2535 PULGAS AVE
1870	BAYSHORE	ACE FIRE EQUIPMENT & SVC	1870 W BAYSHORE RD
1880	BAYSHORE	CAVALLINO COLLISION CENTER	1880 W BAYSHORE
1045	WEEKS	HEW DRILLING	1045 WEEKS
2535	PULGAS	TOUCHATT TRUCKING	2535 PULGAS AVE
1870	BAYSHORE	ACE FIRE EQUIPMENT & SVC	1870 W BAYSHORE RD
1880	BAYSHORE	CAVALLINO COLLISION CENTER	1880 W BAYSHORE
2160	University	AUTOZONE #3302	2160 University Ave
2194	University	E PALO ALTO SHELL	2194 University Ave
1900	University	AT&T Mobility - FOREST AVE & CENTER DR (USID47675)	1900 University Ave
2050	UNIVERSITY	FOUR SEASONS HOTEL	2050 UNIVERSITY AVE
350	DEMETER	CARLOS AUTO REPAIR	350 DEMETER STE 4B
1765	BAYSHORE	WINGSTOP RESTAURANT	1765 E BAYSHORE RD #1
2033	PULGAS	RONALD MCNAIR SCHOOL	2033 PULGAS AVE
2290	UNIVERSITY	FIRE STATION #2	2290 UNIVERSITY AVE
550	BELL	BELL ST PARK SWIMMING POOL	550 BELL ST
2415	UNIVERSITY	SMCO THHW	2415 UNIVERSITY AVE
1043	MYRTLE	EASTSIDE COLLEGE CAFETERIA	1043 MYRTLE ST
1050	MYRTLE	EAST PALO ALTO ACADEMY	1050 MYRTLE ST
2526	Pulgas	A-1 Towing	2526 Pulgas
1180	OCONNOR	OCONNOR PUMP STATION	1180 OCONNOR ST
2090	Bay	INFINITE AUTO	2090 Bay Road
15	NEWELL	WOODLAND PARK APARTMENTS/ COMMUNITIES	15 Newell Rd
156	Verbena	Residential auto repair--for fee	156 Verbena
2190	Addison	Palo Alto Park Mutual (water main	2190 Addison
2190	Addison	Palo Alto Park Mutual (Company inspection) APN#	2190 Addison
165	<i>O'Keefe Street</i>	<i>O'Keefe Townhomes</i>	<i>165 O'Keefe Street #22</i>
220	DEMETER	Roto Rooter	220 Demeter St
2020	Bay Road	Former Romic Site	2020 Bay Road

Street Number	Street Name	Name	Site Address
Multiple I	E PALO ALTO	Canopy (non-profit organization)	Multiple sites Illinois St
175	DEMETER	Menlo Food Coporation	175 Demeter St
2373	UNIVERSITY	Las Adelitas Restaurant and Meat Market	2373 University Ave
1745	E. Bayshore Rd	Starbucks	1745 E. Bayshore Rd
2395	UNIVERSITY	El Jarocho	2395 University Ave
2379	UNIVERSITY	La Tijera	2379 University
2371	UNIVERSITY	EPA Wireless	2371 University Ave
1781	E. Bayshore Rd	The Home Depot	1781 E. Bayshore Rd
1851	Bay	As Towing	1851 Bay Road
264 B	Tara	Specialty Towing	264 B Tara Road
1905	E. Bayshore Rd	Rainer's Tires	1905 E. Bayshore Rd.
1803	Bay	La Familia Discount Store	1803 Bay Road
1195	Garden	Winston Taylor (Home Based Construction)	1195 Garden St
1802	Bay Road	Lozanos Auto Repair	1802 Bay Road
252	Azalia St	Mitchells Carpet Cleaning	252 Bay Road
1961	E. Bayshore Rd	Public Storage, inc	1961 E. Bayshore Rd
1969	Tate St	Bainbridge Property Management	1969 Tate St
264 A.	Tara Rd	Sunrise Towing	264 A. Tara Rd
867	WEEKS	Arteaga Auto Cleaning	867 Weeks St
2520	PULGAS	Gonzales Tires	2520 Pulgas Ave
2305	Clarke Ave	Sams Pressure Washing	2305 Clarke Ave
910	Newbridge St	Ana's Party Place	910 Newbridge St
2387	UNIVERSITY	La Estrellita Market	2387 University Ave
1731	E. Bayshore Rd	Mi Pueblo Market	1731 E. Bayshore Rd
1751	E. Bayshore Rd	PGA Superstore	1751 E. Bayshore Rd
2450	Pulgas Ave	Bormanns Steel	2450 Pulgas Ave
1771	E. Bayshore Rd	Nordstrom Rack	1771 E. Bayshore Road
1838	W. Bayshore Rd	Monterrey Apartments	1838 W. Bayshore Road

Street Number	Street Name	Name	Site Address
275	<i>E. O'Keefe St</i>	<i>Leitrim House Apartments</i>	<i>275 E. O'Keefe St</i>
1717	<i>Woodland</i>	<i>Woodland Arms Apartments</i>	<i>1717 Woodland</i>
280	<i>E. O'Keefe St</i>	<i>Park Apartments</i>	<i>280 E. O'Keefe St</i>
2301	<i>Cooley Ave</i>	<i>Runnymede Gardes</i>	<i>2301 Cooley Ave</i>

**C.4.d.iii.(2)(a) & (c) ► East Palo Alto Facility Inspections**

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 checked="" type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.
	<b>Number</b>
Total number of inspections conducted (C.4.d.iii.(2)(a))	<b>34</b>
Violations, enforcement actions, or discreet number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(2)(c))	<b>26</b>
Comments: <b>1) All enforcement actions were resolved within 10 days and prior to a rain event.</b>	

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

Fill out the following table or attach a summary of the following information.		
	<b>Enforcement Action</b> (as listed in ERP) <sup>48</sup>	<b>Number of Enforcement Actions Taken</b>
Level 1	<b>Verbal Warning</b>	<b>10</b>
Level 2	<b>Warning Notice</b>	<b>11</b>
Level 3	<b>Admin. Action and/or Cost Recovery</b>	<b>5</b>
Level 4	<b>Legal Action</b>	<b>0</b>
<b>Total</b>		<b>26</b>

<sup>48</sup>Agencies to list specific enforcement actions as defined in their ERPs.

<b>C.4.d.iii.(2)(d) ► East Palo Alto Frequency of Potential and Actual Non-stormwater Discharges by Business Category</b>		
Fill out the following table or attach a summary of the following information. <b>Do not leave any cells blank.</b>		
<b>Business Category<sup>49</sup></b>	<b>Number of Actual Discharges</b>	<b>Number of Potential Discharges</b>
<b>Automotive (may be home based)</b>	<b>2</b>	<b>4</b>
<b>Mobile Business/Home Based (not automotive)</b>	<b>0</b>	<b>0</b>
<b>Light Industrial</b>	<b>0</b>	<b>7</b>
<b>Food, Health, Restaurant or Market</b>	<b>2</b>	<b>3</b>
	<b>4</b>	<b>14</b>

<sup>49</sup>List your Program's standard business categories.

**C.4.d.iii.(2)(a) & (c) ► San Mateo County Facility Inspections**

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 checked="" type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.

	Number
Total number of inspections conducted (C.4.d.iii.(2)(a))	<b>25</b>
Violations, enforcement actions, or discreet number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(2)(c))	<b>1</b>

Comments:  
**1) Each enforcement action or potential and actual discharge not resolved within 10 days or otherwise deemed resolved in a longer but still timely manner.**

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

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

	Enforcement Action (as listed in ERP) <sup>50</sup>	Number of Enforcement Actions Taken
Level 1	<b>Verbal Warning</b>	<b>1</b>
Level 2	<b>Warning Notice</b>	<b>0</b>
Level 3	<b>Admin. Action and/or Cost Recovery</b>	<b>0</b>
Level 4	<b>Legal Action</b>	<b>0</b>
<b>Total</b>		<b>1</b>

<sup>50</sup>Agencies to list specific enforcement actions as defined in their ERPs.

**C.4.d.iii.(2)(e) ▶ Non-Filers**

List below or attach a list of the facilities required to have coverage under the Industrial General Permit but have not filed for coverage:  
**No non-filer have been observed for reporting to the Water Board during FY 17/18.**

**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
Ongoing City Training	April 25 May 14 June 4	In field training for business and illicit discharge inspections	2	100%	2	100%

Comments:  
 The SMCWPPP CII Workshop was held on February 28, 2018. The Workshop agenda and attendance list are available on the SMCWPPP website ([www.flowstobay.org/trainings](http://www.flowstobay.org/trainings)). Due to new hires after that date, training has been conducted in-house for new staff members.

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

**Program Highlights and Evaluation**

**Highlight/summarize activities for reporting year:**

Provide background information, highlights, trends, etc.

Summary:

During FY 17/18, the City saw a surge of public complaints for illicit discharges due in part to three primary reasons:

1. Increased number of Recreational Vehicles parked in the public right of way lacking sanitation services;
2. Increased public outreach regarding the illegal activities of illegal dumping and illicit discharges with the City placing banners throughout the community in areas prone to discharges indicating that illicit discharges are forbidden; and
3. New staff hired and trained to identify illicit dumping.

The City also:

4. Participated in the Countywide Program's CII Subcommittee;
5. Updated the Enforcement Response Plans (ERPs) and
6. Worked with the executive team to revise recommended staffing levels to accommodate increased stormwater compliance resources.

More information about item #1.

Between June and October 2017, the City observed intermittent non-point discharges of what appeared and smelled to be sewage discharges from a new recreational vehicle encampment that had accumulated along a street/cul-d-sac that has stormdrain inlets which terminate without discharging into the Bay or another outfall due to hydraulics of the area, resulting in a system which remain largely confined to the area. Unless a storm event forces the hydraulic head of the stormwater to push all water through and back upstream, and through the City's main stormdrain system, the Runnymede drainage system, there is no direct discharge potential of this small sub-watershed. However, this area is a mixed area of residential and industrial and/or industrial buffer.

Between June and October 2017, the City consistently conducted routine inspections and distributed outreach to the RV community to inform them of appropriate sewage and solid waste requirements. By November 2017, the intermittent discharges seemed to have rapidly escalated and resulted in the stormdrain system filling to the street surface. With impending rains, the City closed down that particular street and required the RVs to move out of the flood inundation zone. The resultant 6,000 gallons of what appeared to be sewage was immediately discharged to the sanitary sewer which was adjacent to the stormdrain system serving this area. Through this effort, the City confirmed the existence of



what appeared to be sewage related solids also accumulated in the stormdrain system, and upon the storm passing, further had the sewage district discharge this material into the sewer line for treatment and flushed the stormdrain system, and all accumulated solids, into the sewer line.

Despite a major media presence criticizing the City of “evicting” the RV dwellers, the City addressed the RV crisis by temporarily closing the affected street for a 90 day period of time, within the administrative purview of the public works director.

What precipitated after this event was an ongoing effort by the City Council and staff to address the housing shortage represented by a substantial increase in RVs parking throughout the City, with a program that meets both enforcement requirements as well as inclusive of humanitarian based solutions.

The RV encampment has largely moved one parallel street over from the prior encampment of November 2017, and has resulted in multiple prosecuted observations of direct discharges of sewage from holding tanks and other vessels in FY 17-18, into the public streets and almost daily contributions of solid waste into the public right of way (though these are considered non-point source discharges due to lack of reliable responsible party detailing).

It is estimated that each instance of an illegally dumped sewage holding tank into the public right of way requires roughly 25 man hours to abate, which requires substantial fire, police, sanitary district, city enforcement staff, maintenance, and management support, to ensure public safety.

Despite having an updated Clean City Plan media campaign with banners which provide outreach about illegal dumping fines/prosecution and the City’s reward system of \$500 for those who provide information that leads to prosecution, the occurrence of illegal dumping in the vicinity of this encampment area has not seen reduction.

The City and local non-profits have proactively worked with those in the RV encampment to encourage compliance and the City has successfully prosecuted one man twice when he was observed direct discharging. The City has provided porta-potties for those in the encampment, as well as worked with a local non-profit Dignity on Wheels to provide showers, toilets and laundry facilities to this encampment. Despite these amenities, the City has not seen a reduction in the amount of solid waste being deposited comingled with sewage and hazardous waste in the public right of way.

Due to the high level of contamination, the City has reactively hired a company to remove materials associated with recreational vehicle encampments, with the City Council authorizing the \$120,000 contract for services to these encampment materials. However, the contracted services are intermittent and resolved on a weekly or biweekly basis.

Incidents are believed to occur daily without complaint from this community. As such, the incidents are subsequently not captured in the summarized reports below. Anecdotally, staff observes the illegally dumped trash being accumulated in every growing size on a daily basis.

#### Seeking Resolution

The City has updated requirements for parking on one section of roadway where recreational vehicles were parking, and disposing of refuse while creating issues of blight and fire potential. This was documented in a June 2018 Corp Yard inspection report. This matter has been addressed by requiring parking restrictions in front of the City's corp yard. However, this does not address the larger issue of the RV encampment—it simply moved the burdens associated with the encampment to another location in the City.

The City has been working with the Public Works and Transportation Commission as well as the City Council and Planning Commission on alternative programs and ordinances to address the non-point discharges associated with this homeless community. The City is considering prohibiting overnight parking of oversized vehicles and intends to establish a safe parking program for those living in RVs. While an overnight prohibition was rejected by the City's Public Works and Transportation Commission in both November 2017 and again in September 2018, staff still intends to recommend such a restriction in December 2018.

A "Safe Parking initiative" has been authorized by the City Council and it is anticipated that upon this facility opening (anticipated in December 2018), the City Council may support an oversized vehicle parking prohibition to reduce the incidence of ongoing illicit discharges and ever-increasing numbers of residents and people from outside communities from seeking shelter in RVs parked the public right of way.

In the event that an oversized vehicle parking prohibition not passed by the City Council, staff will recommend costly contracts to place covered solid waste bins in the public right of way which will be made available to those living in RVs on public roadways for sorting and disposal by a contractor that specializes in sorting through hazardous waste, biohazards, and other refuse. While not an ideal circumstance, the addition of a covered bin for refuse collection would reduce the potential for sewage and hazardous waste to come into contact with stormwater.

Great detail is being provided regarding the incidence of recreational vehicles due to the fact that it has created an unplanned and onerous burden on existing staff's time and reduced the effectiveness of the FY 17/18 work plan and has

impacted the City's ability to respond to some more minor incidents of illicit discharges due to limited staffing numbers.

The City has also addressed a surge of illegal dumping calls beginning in May 2018 due to the updated Clean City Plan implementation wherein public outreach and media attention has increased the community's awareness of the illicit discharge and illegal dumping issue, and resulted in an enhanced awareness and calls for service. This has resulted in a lot of staffing resources to address litter and overflowing trash bins. 301 incidents were identified and inspected with many photos documenting illegal dumping incidents that required follow-up, investigation, and ultimately, some prosecution. The requirements of this program includes an intensive effort to discuss with residents the illegal dumping and illicit discharge incidents on a one-on-one basis. When residents are willing and present to open their doors to City staff, the City receives a 90% voluntary compliance rate for those who have illegally dumped solid waste into the public right of way. These residents have largely claimed to be unaware of existing programs for free disposal of these materials and appear grateful for the information provided by the City.

During FY 18/19, it is anticipated that there may be a higher number of enforcement actions for those residents who have already been educated about the illegal dumping prohibition and they will be required to respond to administrative citations should they be found responsible for additional illegal dumping in the future. The City will modify our Enforcement Response Plan to address this new type of illicit discharge issue, which upon implementation will likely reduce the incidence of trash and litter from entering local waterways in areas not covered by full trash capture infrastructure.

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

Summary of any changes made during FY 17-18:  
**The City has updated its Complaint and Spill Response Phone Number to that of an administrative staff which is always covered with a person answering the phone so that illicit dumping activities can be referred in real time.**

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

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)	
	<b>Number</b>
Discharges reported (C.5.d.iii.(1))	<b>301</b>
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(2))	<b>4</b>
Discharges resolved in a timely manner (C.5.d.iii.(3))	<b>305</b>
Comments: <b>See summary of program in program evaluation.</b>	

Section 6 – Provision C.6 Construction Site Controls

<b>C.6.e.iii.(3)(a), (b), (c), (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>
# None—East Palo Alto is fairly flat	# None—East Palo Alto had a water moratorium due to lack of water during FY 17/18. As such, very few building permits were approved; primarily for tenant improvements.	# None. No construction projects of this size were under construction during FY 17/18.	# None. East Palo Alto had a water moratorium due to a lack of water during FY 17/18 and did not issue any permits for grading or construction for high priority projects.
Comments: 1) No data to report; it is anticipated that FY 18/19 will see a surge of development and construction activities. 2) During FY 17/18, staff received focused training so that future construction projects will be compliant. We have trained the building department on BMP plan sheets and construction and demotion solid waste requirements for covered loads and no self-hauling unless authorized by the City Council.			

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

	Enforcement Action (as listed in ERP) <sup>51</sup>	Number Enforcement Actions Issued
Level 1 <sup>52</sup>	Verbal Warning	0
Level 2	Warning Notice	2
Level 3	Admin. Action and/or Cost Recovery	3
Level 4	Legal Action	0
<b>Total</b>		<b>5</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)	0

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

Indicate your reporting methodology below.	
<input type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges as one enforcement action.
<input checked="" type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.
	Number
Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii. .3.g)	5
<b>Comments:</b>	

<sup>51</sup>Agencies should list the specific enforcement actions as defined in their ERPs.

<sup>52</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:

**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 17-18, to implement MRP requirements, the City: 1) revised stormwater construction inspection data tracking tools; 2) revised operating procedures and provided training to inspectors; 3) conducted inspections with the data tracking methods; 4) participated in SMCWPPP's New Development Subcommittee; and 5) worked with the executive team to revise staffing levels to accommodate increased stormwater compliance resources. Refer to the C.6 Construction Site Control section of the SMCWPPP FY 17-18 Annual Report for a description of activities at the countywide or regional level.**

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

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance
Ongoing	Monthly, May, June, July	Best Management Practices for Construction, MRP requirements, new hire training as needed, various inspections for driveway installations, reports and escalating enforcement.	2

**Staff also attended the SMCWPPP Construction Stormwater Inspector Training on March 20, 2018. Refer to the SMCWPPP annual report for detailed information.**

**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 17-18 Annual Report for a description of outreach campaign activities conducted at the countywide level.**

**The City has expanded the public information and outreach to include a more collaborative community engagement program. Adopted in October 2017, the Clean City Plan seeks to educate the entire community about illegal dumping, appropriate solid waste disposal, adequate trash services, illicit discharges, litter abatement, and stormwater compliance through a variety of methods that incorporate community engagement and taking-action, while continuing to promote programs that were already in place in previous years. Through these outreach efforts, and through engagement of local media journalists, many avenues of reaching the community have led to layered community engagement and outreach.**

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

**The City has changed the phone number for community engagement to 650-853-3189 to a line which has a person answering the phone during regular business hours and referring serious issues immediately to an enforcement officer.**



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

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.  
 Use the following table for reporting and evaluating public outreach events  
 See Section 7 of the SMCWPPP FY 17-18 Annual Report for a description of public outreach and citizen involvement events activities conducted at the countywide level.

Event Details	Description (messages, audience)	Evaluation of Effectiveness
<b>Coastal Cleanup Day</b>	<b>Volunteers collect at Cooley landing to engage in cleanup activities, ongoing.</b>	<b>Effectiveness is high as the Bay Trail is cleaned by an increasing higher number of volunteers driven by Grassroots Ecology as the host, Eastside Prep School as the lead high school providing volunteers and others.</b>
<b>Earth Day</b>	<b>This program sought to increase the number of residents learning about sustainability in a wide swath of interests. The City provided information about the Clean City Plan (See below) and engaged participants in a trash sorting an appropriate storage of bins activity for prizes.</b>	<b>Program was highly successful for those in attendance, although the turnout numbers were quite modest. In the future, this program needs to be supported with a lead volunteer group that can engage residents in participating. This may be more appropriately included in the City's Juneteenth celebration of emancipation of the slaves, or Cinco de Mayo, due to the high community turnout for these two events.</b>
<b>Clean Zones</b>	<b>This program is funded by General Funds and provides a financial stipend for community programs (non profits) to participate in voluntary cleanups throughout the City. Generally a monthly</b>	<b>This program is highly effective, but limited to those groups that take the time participate.</b>

	scheduling of cleanups occurs and community groups are provided a stipend for cleaning up areas of the City that require enhanced litter abatement.	
Clean City Plan Direct Outreach	Direct outreach to neighbors surrounding areas where illegal dumping or illicit discharges have been identified by complaint of staff observation. In total there were 297 residents who were contacted through this effort, including delivery of outreach to residents and providing business cards of staff members. This is the first year this program is in action, and the focus is on providing outreach, information, engagement and obtaining voluntary compliance. Future years will increase enforcement actions for those residents who are repeatedly violating the illegal dumping requirements, in part due to low staffing levels and the high time investment that enforcement actions require. The City is modifying the staffing levels for this program to expand the ability to enforce on a large scale, for this effort.	Of those who were present at home during the delivery of the information, 90% provided voluntary compliance when staff were able to identify that the illicit discharge or illegal dumping was sourced by the resident in question. Residents claimed that they were uninformed about appropriate disposal options and placed unwanted materials on the curb to dispose of them as a course of modelled behavior. Future efforts may require enforcement actions for repeat behaviors already noted as having been given a verbal warning and obtained voluntary action. In a couple of instances, materials were found in distant locations (ends of roadways) with contact information/mail/addresses and the residents accepted responsibility and were allowed to remove the materials on a voluntary basis without enforcement repercussions. However, they were informed that future incidents will result in penalties.
Movies in the Park	Monthly movies in the park for June,	This was a low-engagement activity

	July and August resulted in increased awareness of appropriate solid waste bin management, and appropriate waste disposal.	which resulted in modeling the appropriate solid waste management behaviors. Opportunities to expand this program and increase engagement are high and staff will seek to increase effectiveness for future years.
National Night Out	Eight locations throughout the City included solid waste disposal and outreach regarding appropriate trash services and various options for waste disposal. Recycling, compost and trash bins were provided and collected by the City for this effort, which included banners about illegal dumping and rewards for assisting the City in identifying those who were inappropriately disposing of waste or illicit discharges. All told, it is estimated that up to 1000 people were in attendance of this special night to educate against domestic violence, while learning about the City's Clean City Program.	Feedback from residents after this engagement has been increasingly expanded. The number of community complaints about illegal dumping and illicit discharges has risen as has the request for rewards for providing photo documentation about these discharges. This program was deemed highly effective and will require expanded efforts next year to reach the community in a more comprehensive way due to the very effective engagement of meeting residents on their local blocks in a non-enforcement capacity.
Cooley Landing Volunteer Efforts	Grassroots Ecology engages the community in ongoing volunteer efforts and field trips to remove litter and engage in discussions about waterway protection in a hands-on effort to reach as many people in the community as possible.	The growing number of participation indicates an enormous interest in this program and highly informed community members who advocate for the protection of the City's largest parkway and bayside recreation facility.

**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

**See Section 7 of the SMCWPPP FY 17-18 Annual Report for a description of watershed stewardship collaborative efforts conducted at the countywide level.**

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

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment. Use the following table for reporting school-age children outreach efforts.  
**See Section 7 of the SMCWPPP FY 17-18 Annual Report for a description of school-age children outreach efforts conducted at the countywide level.**

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Provide the following information: Name Grade or level (elementary/ middle/ high)	Brief description, messages, methods of outreach used	Provide number or participants	Provide agency staff feedback. Report any other evaluation methods used (quiz, teacher feedback etc.). Attach evaluation summary if applicable.
<b>Grassroots Ecology</b>	<b>Age appropriate field trips regarding native plants/ animals, wetlands, litter impacts on the Bay, cleanups, and environmental sensitivity.</b>	<b>223 adults            31 kids k-5            596 kids 6-12</b>	<b>Quantitative data: 42 workdays (picking up trash, weeding, planting)            0.7 miles cleaned of trash            300 bags of litter with about 20 gallons per bag filled, about 6,000 gallons of trash, or roughly 3,000 pounds of litter picked up from the shoreline.            Subjective Data: ongoing repeat field trip scheduling indicates that the program is deemed valuable by teachers, parents, students, and adult participants.            Based on most recent cleanup event, program appears to be developing a culture of nurturing the environment at Cooley Landing Park.</b>
<b>Clean Zones</b>	<b>Community pride, partnership, illegal dumping, litter</b>	<b>251 participants</b>	<b>Highly effective program to provide some non-profit support funding for groups who provide hours of</b>

	abatement, community collaboration, integration with police goals.	(all ages)	community service, including nuisance abatement, litter collection, outreach distribution. <b>Over 5,340 Gallons of litter collected</b> , with an average weight of about 25 pounds each for a total weight of about <b>2,670 pounds of litter removed</b> from local streets through various non-profits assisting the community and receiving stipends for their programs.
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Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a. ► Implement IPM Policy or Ordinance							
Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?				<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
If no, explain:							
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphates, pyrethroids, carbamates fipronil, indoxacarb, diuron, and diamides. A separate report can be attached as evidence of your implementation.							
Trends in Quantities and Types of Pesticide Active Ingredients Used <sup>53</sup>							
Pesticide Category and Specific Pesticide Active Ingredient Used	Amount <sup>54</sup>						
	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21	
<b>Organophosphates</b>	FY 15-16	FY 16-17	None				
Active Ingredient Chlorpyrifos	None	None	None				
Active Ingredient Diazinon	None	None	None				
Active Ingredient Malathion	None	None	None				
<b>Pyrethroids (see footnote #57 for list of active ingredients)</b>	None	None	None				
Active Ingredient Type X	None	None	None				
Active Ingredient Type Y	None	None	None				
<b>Carbamates</b>	None	None	None				
Active Ingredient Carbaryl	None	None	None				
Active Ingredient Aldicarb	None	None	None				
<b>Fipronil</b>	None	None	None				
<b>Indoxacarb</b>	Reporting	None	None				

<sup>53</sup>Includes all municipal structural and landscape pesticide usage by employees and contractors.

<sup>54</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, lambdacyhalothrin, and permethrin.

	not required in FY 15-16					
<b>Diuron</b>	Reporting not required in FY 15-16	<b>None</b>	<b>None</b>			
<b>Diamides</b>	Reporting not required in FY 15-16	<b>None</b>	<b>None</b>			
<b>Active Ingredient Chlorantraniliprole</b>		<b>None</b>	<b>None</b>			
<b>Active Ingredient Cyantraniliprole</b>		<b>None</b>	<b>None</b>			
<p><b>The City uses Roundup Pro Max as a primary means of herbicide control in parks, medians and other vegetated areas and is not registered to use restricted materials; all maintenance staff is trained for use of this material on an annual basis and also works with the SM County Department of Agriculture to ensure appropriate permitting.</b></p> <p><b>The City Contracts out to Terminix Pest Control for exterior structural and building treatments.</b></p> <p><b>The City has been implementing its IPM policy by utilizing the following techniques and practices:</b></p> <ul style="list-style-type: none"> <li><b>• Use of non-chemical strategies such as monitoring, mowing weeds, mulching.</b></li> <li><b>• Removal of plants that require frequent pesticide applications.</b></li> <li><b>• Replacing invasive plants with natives.</b></li> <li><b>• Preventive actions such as sealing holes and gaps in structures, improving sanitation.</b></li> <li><b>• Use of baits and traps instead of broadcast pesticides</b></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>3</b>
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	<b>9</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 7, 2018, SMCWPPP IPM Contractor Management Workshop held on May 15, 2018, Training from 3<sup>rd</sup> party trainers: .</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?	<b>X</b>	<b>Yes</b>	<b>No</b>
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	<b>X</b>	<b>Yes</b>	<b>No,</b>
If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored <b>In prior years, contractor was difficult to ensure compliance, but the City began auditing contractor for various scheduled services and requiring pesticide use reports in 2011. Upon requiring these use reports, contractor reports that they have instigated a more labor-based methodology and consistently uses little or no pesticide. The City annually requests and reviews pest monitoring reports and asks whether the use of pesticides were necessary as all calls for pest control go through a central office and the staff reports little or no pest problems. Contractor now knows the City will request what other actions were taken prior to chemical pesticides being applied which has resulted in lower levels of pesticides being reported as used.</b>			

<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
If yes, summarize the communication. If no, explain. <b>See Section 9 of the SMCWPPP FY 17-18 Annual Report for a summary of communication with the San Mateo County Agricultural Commissioner.</b>			
Did your municipality report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No
If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary. <b>The City is 2.5 square miles and staff is readily watching for appropriate and inappropriate use of pesticides. To date, there have been no referrals other than internal questions reported to the County Ag dept. but we would report if we suspected concerning applications.</b>			

<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.	
Summary: <b>See Section 9 of the SMCWPPP FY 17-18 Annual Report for a description of point of purchase public outreach efforts conducted at the countywide level and regionally.</b>	

<b>C.9.e.ii (2) ▶ Public Outreach: Pest Control Contracting Outreach</b>	
Provide a summary of outreach to residents who use or contract for structural pest control and landscape professionals); <b>AND/OR</b> reference a report of a regional effort for outreach to residents who hire pest control and landscape professionals in which your agency participates.	
Summary: <b>See Section 9 of the SMCWPPP FY 17-18 Annual Report for a summary of outreach to residents who hire pest control and landscape professionals.</b>	

**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.

**See Section 9 of the SMCWPPP FY 17-18 Annual Report for a summary of pest control operators and landscapers to reduce pesticide use.**

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

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

Summary:

**During FY 17-18, we participated in regulatory processes related to pesticides through contributions to the Countywide Program, BASMAA and CASQA. For additional information, see the Regional Report submitted by BASMAA on behalf of all MRP Permittees.**

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

<b>C.10.a.i ▶ Trash Load Reduction Summary</b>	
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	
<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) <sup>109</sup>	<b>4.4%</b>
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>1</sup>	<b>45.7%</b>
Percent Trash Reduction due to <b>Jurisdictional-wide Source Control Actions</b> (as reported in C.10.b.iv)	<b>7.0%</b>
<b>SubTotal for Above Actions</b>	<b>57.1%</b>
<b>Trash Offsets (Optional)</b>	
Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	<b>10.0%</b>
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	<b>0%</b>
<b>Total (Jurisdictional-wide) % Trash Load Reduction through FY 2017-18</b>	<b>67.1%</b>

- **The City attained and reported 59.7% trash load reduction (including trash offsets) in its FY 16-17 Annual Report. During FY 17-18, the City continued to implement a robust trash control measure program. This helped the City maintain and increase its trash load reduction above the mandatory 70% trash load reduction requirement included in the MRP. The total (jurisdiction-wide) percent trash load reduction in FY 17-18 is 70.1% (including trash offsets). The most recent version of the City’s Baseline Trash Generation Map can be downloaded at URL here .**  
[http://www.flowstobay.org/sites/default/files/East%20Palo%20Alto%20Trash%20Map%2011%20X%2017%209\\_6\\_2018.pdf](http://www.flowstobay.org/sites/default/files/East%20Palo%20Alto%20Trash%20Map%2011%20X%2017%209_6_2018.pdf)
- **The “trash load reductions” section of the table above will be completed by Countywide Program staff based on information in our GIS database and forwarded to SMCWPPP member agencies. Any**

<sup>109</sup> See Appendix 10-1 for changes between 2009 and FY 17-18 in trash generation by TMA as a result of Full Capture Systems and Other Measures.

**inconsistencies identified by SMCWPPP member agencies can then be reconciled.**

<b>C.10.a.ii.b ▶ Trash Generation Area Management - Identification of Private Drainages &gt;10,000 ft<sup>2</sup></b>					
State (Y/N) if your agency completed Permit Provision C.10.a.ii.b. If Yes, attach a map (or other record) or provide a website link to a map (or other record) of the location of lands >10,000 ft <sup>2</sup> (in Very High, High, and Moderate trash generation areas) that are plumbed directly to the Permittee's storm drain systems, including trash control status of these areas. If No, provide explanation of why the provision was not completed and the estimated date when the provision will be completed.					
<b>Did your agency complete Permit Provision C.10.a.ii.b?</b>	<b>X</b>	<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>
<b>If No, provide explanation and estimated completion date:</b>					
<p><b>Description of the process used to identify applicable areas and their trash control status:</b></p> <p><b>On site storm drainage areas known to City Staff and/or available through the most current Stormdrain Master Plan. The City worked through SMCWPPP to identify the location of land areas &gt;10,000 ft<sup>2</sup> in very high, high, and moderate trash generation areas (as depicted on the City's baseline trash generation map) that are plumbed directly to the City's MS4. In summary, applicable land areas were identified using existing data/information and a combination of desktop analyses and field visits. Land areas &lt;10,000 ft<sup>2</sup>, or areas identified as low trash generating on the City's baseline trash generation maps, or are currently treated by full capture systems were excluded from the analysis. The preliminary trash control status of these land areas were identified by conducting virtual (desktop) on-land visual trash assessments (OVTAs). For a complete description of the methods and process used to identify applicable land areas and their trash control status, please see the SMCWPPP FY 17-18 Annual Report.</b></p> <p><b>URL link to Map:</b>  <a href="http://www.flowstobay.org/sites/default/files/East%20Palo%20Alto%20Property%20Drainage%20Map%20Sept%202018.pdf">http://www.flowstobay.org/sites/default/files/East%20Palo%20Alto%20Property%20Drainage%20Map%20Sept%202018.pdf</a></p>					

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

Provide the following:

- 1) Total number and types of full capture systems (publicly and privately-owned) installed prior to FY 17-18, during FY 17-18, and to-date, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3.
- 2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for non-population based Permittees compared to the total required by the permit.

Type of System	# of Systems	Areas Treated (Acres)
<b>Installed Prior to FY 17-18</b>		
<b>Connector Pipe Screens (Public)</b>	<b>38</b>	<b>55.6</b>
<b>Installed in FY 17-18</b>		
<b>None</b>	<b>None</b>	
<b>Total for all Systems Installed To-date</b>	<b>38</b>	<b>55.6</b>
<b>Treatment Acreage Required by Permit (Population-based Permittees)</b>		
<b>Total # of Systems Required by Permit (Non-population-based Permittees)</b>		

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

Provide the following:

- 1) Jurisdiction-wide trash reduction in FY 17-18 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 17-18 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 17-18	Summary of Maintenance Issues and Corrective Actions
1		<b>38</b>	<b>29%</b>	<b>Grit, Dirt, single use food containers, residential trash,</b>
2				
3				
4				
5				
6				
7				
8				
<b>Total</b>	<b>4.4%</b>			
<b>Total</b>				

**Certification Statement:**

<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 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.

Summary of Trash Control Measures Other than Full Capture Devices:

- **On-land Cleanup:** Beginning in August 2012, the City began the “Partnership in Pride campaign” in an effort to engage community members to take more pride in the blight throughout the City, with a focus on litter and graffiti. Beginning with a high school football team building exercise, the Campaign provided an opportunity for many students to earn community service, while benefiting the community. This has taken shape through the Police Department’s “Fit Zone” program morphing into the Police Departments “Clean Zone” which provides police support and stipend funding to non-profits who wish to cleanup the community through litter abatement efforts. This information was reported in the public information and participation section of this report. Grassroots Ecology has hosted dozens of work days at the Cooley Landing Environmental Education Center, which sits bayside. Due to the isolated nature of the location of this park and the fact that  $\frac{3}{4}$  of the park sits alongside the San Francisco Bay, over 300 pounds of trash (at a minimum) were eliminated from direct windblown access to being deposited into the San Francisco Bay.
- **Partial Capture Devices:** The City of East Palo Alto has maintained an installed fence/banister/flood control wall along the San Francisquito Creek which has provided a substantial reduction in directly deposited litter and trash, which has subsequently preventing hundreds of gallons of trash from entering the waterways by restricting direct access into the San Francisquito Creek as verified by the FY 17.18 annual Creek Walk. As previously reported, while this was not the primary function of this flood control wall, it has reduced the trash load at the City’s trash hot spot tremendously and has also provided enhanced understanding of the amount of litter entering the San Francisquito Creek via stormdrain outfalls from City Streets.
- **Storm Drain Inlet Cleaning:** When the City incorporated, the stormdrain system was poorly maintained. Since the MRP 1.0, the City has been maintaining all stormdrain inlets with the Maintenance Staff under the Public Works Division. Materials are removed with a vactor truck twice a year to ensure the inlets are not prone to flooding.

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

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

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

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

- **Uncovered Loads:** During MRP 1.0, the City attempted a variety of efforts to reduce uncovered loads. Due to the large number of self-hauling businesses, local efforts have been constrained by varying staffing levels and the prioritization. In FY 14/15 and 15/16, the City began hiring community service aids to provide parking enforcement. In FY 16/17, the City expanded the effort of addressing uncovered loads by working with local businesses and parking enforcement to ensure all loads are properly covered. Fiscal Year 17/18 the City failed to expand this effort to begin fines and penalties when specific vehicles are not addressing the issue due to challenges resulting in illicit discharges from recreational vehicles. It is hopeful that this can be promoted during FY 18/19.
- **Anti-littering and illegal dumping enforcement activities:** During the term of MRP 1.0, the City has worked on a number of fronts to address illegal dumping and littering. Illegal dumping is tracked by complaint via a new single contact point—the City's Community and Economic Development receptionist—who takes each call refers it to the appropriate person via email for electronic reporting. Staff then verifies and inspects each complaint and discusses the illegal dumping with nearby residents to inform them of the illegal issues. Staff, when appropriate, sends a copy to the City's franchise hauler, Recology, who picks up the materials within 24 hours. The City has increased tracking and intends to hold those repeat

violators accountable if there is a recurrence of illegal dumping by an individual To date, the City has successfully prosecuted at least two incidents of illicit discharge/illegal dumping.

The City is also working to encourage residents to utilize the reward system of obtaining \$500 per reported incident that results in illegal dumping or illicit discharge prosecution and has utilized banners to detail the crime and encourage reporting. This has been taken up by local news channels which has further spread the word of the campaign. The banners have resulted in a number of “hot spots” of illegal dumping being eliminated and a more robust response by the community in reporting illegal dumping incidents.

- The problem is on the rise. In 2014/15, there were over 700 cases of reported illegal dumping. During FY 15/16, there were over 1,000 reports of illegal dumping. This information is tracked through Recology, who provides reports to the City as part of the Franchise Agreement. During FY 17/18, the City has taken over the recordation of all complaints beginning in May 2018 and started actively talking to residents who reside near a location where an illegal dumping or illicit discharge has occurred. Staff is obtaining voluntary compliance in 90% of the incidents when a resident is at home when being contacted. These residents take ownership of the materials that have been illegally dumped and appropriately schedule solid waste services. In at least two instances, residents have even removed materials found on streets other than their own, and recovered the materials to appropriately dispose of them. The City is hoping to host a 1<sup>st</sup> Annual Great Citywide Litter Pick-up in October 2018 as a celebration of the 1<sup>st</sup> year of the Clean City Program, in hopes that the community will become educated about litter abatement efforts. The Mayor has requested a “call to action” from all residents and business owners, to provide an hour of community service to eliminate the litter problem on a single day.

Anti-littering has also been a focus for the community during the MRP 1.0 permit term. Primary activities have focused on providing clean-up events, encouraging volunteer engagement, and providing classroom education on the issue of illegal dumping and littering at the 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 FY17/18, the City has implemented a Solid Waste Management Program, with City Council support, which will be expanded within the Clean City Plan to address activities associated with illegal dumping and illicit discharge. It is anticipated that this expanded program, which will include new part time staff members, will have started to address the source of many illegal dumping issues: tenants and businesses who lack access to adequate trash service. It is expected to be widely expanded to include enhanced enforcement in FY 18/19.

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

During FY17/18, the City has implemented a Solid Waste Management Program, with City Council support, which includes a Clean City Plan to address activities associated with container management, illegal dumping and homeless encampments. This effort is likely to be further expanded in FY 18/19, which will include a new full time staff member, to continue to address the source of many overflowing bin issues: tenants and businesses who lack access to adequate trash service and expand local policies to address these issues. It is anticipated that in FY 18/19, access to adequate sized bins will greatly reduce the quantity of trash that makes its way to the local streets and waterways along with the abatement of a new major encampment which has resulted in illicit discharges of sewage and solid waste into local roadways.

**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 17-18 attributable to trash management actions other than full capture systems implemented in each TMA; OR
- 3) Indicate that no on-land visual assessments were performed.

If no on-land visual assessments were performed, check here and state why:

Explanation:

TMA ID or (as applicable) Control Measure Area	Total Street Miles <sup>110</sup> Available for Assessment	Summary of On-land Visual Assessments <sup>111</sup>			Jurisdictional-wide Reduction (%)
		Street Miles Assessed	% of Available Street Miles Assessed	Avg. # of Assessments Conducted at Each Site	
1	13.08	1.77	13.54%	5.4	24.8%
2	7.92	1.04	13.2%	6.0	8.0%
3	0.78	0.39	49.9%	5.0	4.7%
4	0.94	0.20	21.9%	6.0	0.0%
5	4.36	1.01	23.2%	4.6	2.3%
6	3.13	0.36	11.6%	5.0	4.5%
7	0.79	0.38	47.4%	5.5	1.3%
8*	0.00	NA	NA	NA	NA
<b>Total</b>		<b>4.75</b>	<b>-</b>	<b>-</b>	<b>45.7%</b>

<sup>110</sup> Linear feet are defined as the street length and do not include street median curbs.

<sup>111</sup> Assessments conducted between July 2016 and July 2018 are assumed to be representative of trash levels in FY 17-18 and were therefore used to calculate the jurisdictional-wide reductions reported in this section.

**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.

<p><b>Single Use Bag Ordinance</b></p>	<p>The City Council adopted the San Mateo County Reusable Bag Ordinance on April 19, 2012 for implementation October 1, 2012. This prohibits the distribution of single-use plastic bags and requires a \$0.10 fee be assessed for paper or heavy plastic bags.</p>	<p>Inspections and hot spot assessments are conducted to assess the effectiveness of the control measure in reducing trash from entering the municipal stormwater conveyance system. The City developed its % trash reduced estimate using the following assumptions:          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</p>	<p>Results of assessments conducted by the County of San Mateo on behalf of all municipalities in San Mateo County indicate that the City’s ordinance is effective in reducing the number of single use plastic bags in stormwater discharges. This preliminary conclusion is based on the very small number of complaints received from customers about businesses in San Mateo County that are continuing to use single use plastic bags after ordinances were adopted.</p>	<p>7%</p>	<p>10.0% (Maximum)</p>
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**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.

		<b>plastic bag ordinances, and the fact that staff inspections have indicated no violations of this ordinance.</b>			
<b>Expanded Polystyrene Food Service Ware Ordinance</b>	<b>No such ban.</b>	<b>No such ban,</b>	<b>No such ban.</b>	<b>No such ban.</b>	



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

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

**Guidance:**

**Refer to BASMAAs FY 17-18 Annual Report.**

**City Staff removed two five gallon buckets of litter from the two locations below for trash hot spot assessment in FY 17/18 and therefore did not conduct a community cleanup at these sites. Trash reduction is given to the fact that these sites are no longer accessible to the public as one site is blocked off by a permanent fence/barrier/flood wall while another location is inaccessible for FY 17/18 due to construction.**

**C.10.c ► Trash Hot Spot Cleanups**

Provide the FY 17-18 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 17-18.

Trash Hot Spot	New Site in FY 17-18 (Y/N)	FY 17-18 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2013-14	FY 2014-15	FY 2015-16	FY 2016-17	FY 2017-18
<b>EPA01</b>	<b>N</b>	<b>None</b>	<b>3.6</b>	<b>2.4</b>	<b>0.6</b>	<b>0.1</b>	<b>.05</b>
<b>EPA02</b>	<b>N</b>	<b>None</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>1.5</b>	<b>.05</b>

<b>C.10.d ► Long-Term Trash Load Reduction Plan</b>	
Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), baseline trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your baseline trash generation map was revised and if so what information was collected to support the revision. If your baseline trash generation map was revised, attach it to your Annual Report.	
Description of Significant Revision	Associated TMA
In FY 15-16, consistent with all MRP Permittees, all public K-12 schools, college and university parcels were made non-jurisdictional on the City’s baseline trash generation maps. Under California Government Code Sections 4450 through 4461, the construction, modification, or alternation of facilities and/or structures on these parcels are under the jurisdiction of the California Division of State Architect and not the City. The public right-of-way (e.g., streets and sidewalks) surrounding these parcels remain as jurisdictional on the City’s baseline trash generation maps. The City’s revised baseline trash generation map is included as Appendix 10-2.	All Applicable
During FY 16/17, the City switched out all components that were deemed “full trash capture equivalent” in exchange for full trash capture devices. The City has been pursuing the installation large scale full trash capture devices where the lowest installation costs, lowest maintenance requirements, and highest drainage area will be treated. The present effort includes two major outfall locations that drain roughly 70% of the City.	1A,1C,1D, Portions of 2,3,4,5,6,and 8
This TMA requires coordination with future developers to address the drainage as it currently flows into drainage outfalls that are submerged with sediment and bay mud. Treatment depends on future planned development of TMA #7.	1B
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.	2
This TMA requires coordination with future developers to address the drainage as it currently flows into drainage outfalls that are submerged with sediment and bay mud. Treatment depends on future planned development of the Ravenswood Specific Plan area.	7

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

Provide a summary description of each offset program implemented, the volume of trash removed, and the offset claimed in FY 17-18. 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.

Type	Description	# of Events, Frequency	Amount of litter removed (gallons/pounds)
<b>Direct Trash Discharge Controls</b>	NA	NA	NA
<b>Additional Creek and Shoreline Cleanups</b>	See C.7f PIP Grassroots Ecology, for detailed information with about 8-10 volunteers per event removing litter.	42 Events (almost weekly)	6,000g/ 3,000 lbs
	See C.7f PIP for Clean Zones detailed information with an average of about 15 volunteers per event eliminating litter.	13 events (monthly or more)	5,340g/ 2670 lbs
	Mark Dinan, a local Resident, walks daily on the Bay Trail. He removes a little litter daily some days more, some days less, but collectively about 5 gallons a week of litter each week, which is about 2 pounds of trash per bucket/ per week.	50 Events	250 g/ 500 lbs

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

As provided in the most recent update provided to Water Board Staff on September 6, 2018, and periodically throughout the year, the City is working to comply with the 70% and 80% mandatory reduction requirements in a timely manner. The City has amended the long term trash load reduction plan to reflect compliance will be obtained primarily through full trash capture device installation, and has funded a capital improvement program to eliminate trash throughout the majority of the city prior to July 1, 2019 deadline for 80% full trash capture through the installation of a large scale device at the outfall of the City's main discharge point into San Francisquito Creek at the O'Connor Pump Station. This has been described in person to the Water Board hearings and is continuing to progress with a construction currently underway. The City intends to continue to make additional progress on an annual basis through large and small device installations according to an assessment that was completed in 2017.

The large scale trash capture device in San Francisquito Creek that is currently being constructed at the O'Connor Pump Station Outfall will be fully operational prior to January 31, 2019. While working within the San Francisquito Creek bank in a man-made outfall structure, the project has a limited construction window and requires major construction be achieved prior to October 15, 2018 due to endangered species that occur in this area. Between October 15 and January 31<sup>st</sup>, no loud noises or disturbances will be permitted to occur and the pump station will return to its intended function of discharging the City's surface water. The City has been informed that due to tariffs on steel, i-beams and screens are being delayed, which will require a tightened timeline of work construction. However, the schedule is being adjusted to ensure all the heavy equipment work will occur prior to the October 15<sup>th</sup> deadline. Work in this area requires close coordination between storms to shut down the pump station while final installation work commences. Staff will continue to update the Water Board with progress reports and incremental progress occurs.

There are a variety of community groups and litter abatement efforts that are not being reported. The Mayor of East Palo Alto has activated the community to be pro-active and many groups are out in the neighborhoods and along the Bay Trail cleaning up litter daily, weekly, and monthly. The City has included an example of one resident's efforts to remove litter every day as he walks the Bay Trail. There are dozens of residents like this one living in EPA, making their little walk cleaner every day. But, staff has verified the actions of this single individual for tracking purposes.

As a follow-up, the Mayor will host a 1<sup>st</sup> Annual Great Citywide Litter Pick-up in October 2018 celebrating one year of the City's Clean City Program implementation, requesting every resident contributes a single hour of service for this event. We will track these efforts, and quantify the bayside improvements for neighborhoods that direct discharge to local waterways for reporting in FY 18/19.

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 17-18.

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 17-18 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 17-18 After Accounting for Full Capture Systems and Other Control Measures					Jurisdiction-wide Reduction via Other Control Measures (%)	Jurisdiction-wide Reduction via Full Capture AND Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1	3	20	456	0	480	54	8	418	0	480	4.4%	64	309	106	0	479	24.8%	29.2%
2	1	1	226	0	228	1	1	226	0	228	0%	15	86	126	1	228	8.0%	8.0%
3	0	0	50	0	50	0	0	50	0	50	0%	27	23	0	0	50	4.7%	4.7%
4	0	36	0	0	36	0	36	0	0	36	0%	2	16	18	0	36	0%	0%
5	0	135	28	0	162	0	135	28	0	163	0%	39	112	12	0	163	2.3%	2.3%
6	0	0	116	0	116	0	0	116	0	116	0%	4	56	54	2	116	4.5%	4.5%
7	0	102	0	0	102	0	102	0	0	102	0%	59	40	3	0	102	1.3%	1.3%
8	92	0	0	0	92	92	0	0	0	92	NA	92	0	0	0	92	NA	NA
<b>Totals</b>	<b>97</b>	<b>294</b>	<b>876</b>	<b>0</b>	<b>1,267</b>	<b>147</b>	<b>282</b>	<b>837</b>	<b>0</b>	<b>1,266</b>	<b>4.4%</b>	<b>302</b>	<b>642</b>	<b>319</b>	<b>3</b>	<b>1,266</b>	<b>45.7%</b>	<b>50.1%</b>

Section 11 - Provision C.11 Mercury Controls

**C.11.a ► Implement Control Measures to Achieve Mercury Load Reductions**

**C.11.b ► Assess Mercury Load Reductions from Stormwater**

See the SMCWPPP FY 2017-18 Annual Report for updated information on:

- Documentation of mercury control measures implemented in our agency’s jurisdictional area for which load reductions will be reported and the associated management areas;
- A description of how the BASMAA Interim Accounting Methodology<sup>58</sup> was used to calculate the mercury load reduced by each control measure implemented in our agency’s jurisdictional area and the calculation results (i.e., the estimated mercury load reduced by each control measure);
- Supporting data and information necessary to substantiate the load reduction estimates; and
- For Executive Officer approval, any refinements, if necessary, to the measurement and estimation methodologies to assess mercury load reductions in the subsequent permit.

The City has implemented a battery collection program at City facilities and enhanced residential access to battery collection through the Rethink Waste / SBWMA JPA efforts to reduce the occurrence of batteries in the waste stream. Success of this program will be considered in the FY 18/19 Annual Report.

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

See the SMCWPPP FY 2017-18 Annual Report for information on the quantitative relationship between green infrastructure implementation and mercury load reductions, including all data used and a full description of models and model inputs relied on to establish this relationship.

<sup>58</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.11.e ► Implement a Risk Reduction Program**

**A summary of countywide and regional accomplishments for this sub-provision are included in the SMCWPPP FY 2017-18 Annual Report.**



Section 12 - Provision C.12 PCBs Controls

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

See the SMCWPPP FY 2017-18 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>59</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);
- Supporting data and information necessary to substantiate the load reduction estimates; and
- For Executive Officer approval, any refinements, if necessary, to the measurement and estimation methodologies to assess PCBs load reductions in the subsequent permit.

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

See the SMCWPPP FY 2017-18 Annual Report for information on the quantitative relationship between green infrastructure implementation and PCBs load reductions, including all data used and a full description of models and model inputs relied on to establish this relationship.

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

A summary of countywide and regional accomplishments for this sub-provision is included in the SMCWPPP FY 2017-18 Annual Report.

<sup>59</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.f ▶ Manage PCB-Containing Materials and Wastes During Building Demolition Activities So That PCBs Do Not Enter Municipal Storm Drains**

A summary of countywide and regional accomplishments for this sub-provision is included in the C.12 PCBs Controls section of the SMCWPPP FY 2017-18 Annual Report.

Does your agency plan to seek exemption from this requirement?

Yes

No

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

A summary of countywide and regional accomplishments for this sub-provision are included in the SMCWPPP FY 2017-18 Annual Report.

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

A summary of countywide and regional accomplishments for this sub-provision are included in the SMCWPPP FY 2017-18 Annual Report.

Section 13 - Provision C.13 Copper Controls

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

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

Summary:

**The occurrence of architectural copper features has not been occurring locally, but there is a screening process to assist with the implementation of bmps should an architectural feature be installed locally.**

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

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

Summary:

**There are very few pools and spas in East Palo Alto. When discharges are witnessed, staff requires evidence that the discharges are clean of copper containing chemicals by photo or chemical documentation.**

**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:

**Commercial/Industrial inspections at metal fabricators and metal shops have resulted in no evidence of copper containing chemicals or materials present. Continuous inspection will apply to these industries.**

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 has an ongoing Water Efficiency Landscaping Ordinance which requires that any permit issued, when landscaping is disturbed, review of the WELO will apply. The City encourages drought tolerant and native vegetation when providing planting palates for consideration. Due to the high cost of water service in the area, the City has a large number of non-profit partners administering grants for water conserving features in homes and businesses. Further, the City is working with up and coming local development projects to install cisterns and other rain capturing devices for non-potable water uses such as toilets in office buildings and other facilities, which has multiple water quality benefits including stormwater detention, potable water use reduction, and enhanced peak flow reduction to the stormdrain system.**