



# Town of Hillsborough

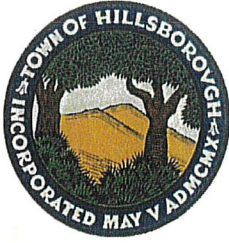
## Stormwater Pollution Prevention FY 2018-2019 Annual Report



**September 30, 2019**

**Town of Hillsborough  
1600 Floribunda Ave  
Hillsborough, CA 94010-6418**





Town of Hillsborough  
Department of Public Works  
1600 Floribunda Avenue  
Hillsborough, CA 94010-6418  
Phone #: 650-375-7444

September 30, 2019

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

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

Dear Mr. Montgomery:

This letter and Annual Report with attachments is submitted by the Town of Hillsborough pursuant to Permit Provision C.17.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of compliance activities conducted during FY 2018/19 and related accomplishments.

Please contact Natalie Asai at 650-375-7444 regarding any questions or concerns.

Very truly yours,

Paul Willis, P.E., QSD/QSP  
Director of Public Works / City Engineer

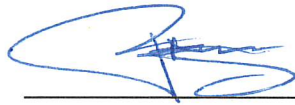


**Town of Hillsborough  
FY 2018/19 ANNUAL REPORT**

**Certification Statement**

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

**Signature of Duly Authorized Representative:**



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Paul Willis, P.E., QSD/QSP  
Director of Public Works/City Engineer

9/26/19

Date



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Section 1 – Permittee Information

Background Information					
<b>Permittee Name:</b>	Town of Hillsborough				
<b>Population:</b>	10,913				
<b>NPDES Permit No.:</b>	CAS612008				
<b>Order Number:</b>	R2-2015-0049				
<b>Reporting Time Period (month/year):</b>	July 2018 through June 2019				
<b>Name of the Responsible Authority:</b>	Paul Willis, P.E., QSD/QSP			<b>Title:</b>	Director of Public Works / City Engineer
<b>Mailing Address:</b>	1600 Floribunda Avenue				
<b>City:</b>	Town of Hillsborough	<b>Zip Code:</b>	94010	<b>County:</b>	San Mateo
<b>Telephone Number:</b>	650 375 7444		<b>Fax Number:</b>	650 548 0859	
<b>E-mail Address:</b>	pwills@hillsborough.net				
<b>Name of the Designated Stormwater Management Program Contact (if different from above):</b>	Natalie Asai, P.E. QSD/QSP			<b>Title:</b>	Associate Engineer
<b>Department:</b>	Public Works Department				
<b>Mailing Address:</b>	1600 Floribunda Avenue				
<b>City:</b>	Town of Hillsborough	<b>Zip Code:</b>	94010	<b>County:</b>	San Mateo
<b>Telephone Number:</b>	650 375 7444		<b>Fax Number:</b>	650 548 0859	
<b>E-mail Address:</b>	nasai@hillsborough.net				



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

**Program Highlights and Evaluation**

Highlight/summarize activities for reporting year:

Summary:

The Town of Hillsborough encompasses a rural geography that is zoned single-family residence, which requires different methods of maintenance when compared to common methods used in urbanized areas. The Town does not have typical streets or roads compared to other public agencies, but the Town responds diligently to all municipal operations. Town residents are responsible for maintaining curb/gutters and parking strip areas free of debris per the Town's Municipal Code.

The Town uses site-specific Stormwater Pollution Prevention Plan (SWPPP) to inspect and maintain the Town's Corporation Yard to comply with water quality standards. The Town diligently continues to prevent potential pollution by implementing BMPs in maintenance practices.

The Town conducts regular storm drain inlet inspections and cleaning, both pre-winter and regularly throughout the winter season. In FY 18-19, the Town removed 220 cubic yards of leaves, 250 cubic yards of material by sweeping 130 curb miles of Town streets, and 181 cubic yards of trash by inspecting 545 and cleaning 485 storm drain inlets, cross culverts, conduits and/or storm drain curb inlets/outlets.

Refer to the C.2 Municipal Operations section of the SMCWPPP FY 18-19 Annual Report for a description of activities implemented at the countywide and/or regional level.

The Town's Staff participated in the SMCWPPP Maintenance Subcommittee in FY 2018/19.

**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: Town residents remove debris along their frontages. To help supplement cleanup, after events such as storms, the Town purchased a street sweeper in 2015. The Town's sweeping efforts cover peak events, and it does not eliminate an owner's responsibility. The Town also uses street sweeper during the street and road repair and maintenance activities. All debris and waste materials related to street and road repair and/or maintenance are collected and disposed of at the Corporation Yard in waste containers, which are then transported to an approved facility by the Town contracted refuse company. The Caltrans Stormwater Quality Handbook Maintenance Staff Guide and the California Stormwater Quality Association Stormwater Best Management Practice Handbook is available for Town staff and contractors to use for

all related capital street/road improvement projects and maintenance activities.

**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>NA</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
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<b>NA</b>	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs
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Comments: The Town's roadways predominantly do not have traditional sidewalks with curbs and gutters. As a result, sidewalk maintenance is not required. At the Town's limited number of rolled curb/gutters, collection of street debris is done on an as-needed basis.

The Town residents are responsible for cleaning and disposing of leaves and street debris within the rolled curb and gutters along their property frontage. Parking strips are maintained by property owners. However, the parking strips throughout the Town are primarily composed of interlocking pavers, decomposed granite, or turf blocks, which serve as drainage systems that filter and infiltrate stormwater runoff prior to discharge into the storm drain system. The Town maintenance staff responds diligently if a lack of maintenance becomes a nuisance to the public.

**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
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<b>NA</b>	Control of discharges from graffiti removal activities
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<b>NA</b>	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
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<b>NA</b>	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
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<b>NA</b>	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
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<b>NA</b>	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
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Comments: All graffiti removal activities on public facilities are done in-house by the Town staff trained in the proper capture and disposal of graffiti removal waste. During the FY 18-19 reporting year, no bridge and structure maintenance or graffiti removal was conducted. If needed, the Town staff follows the BASMAA's Pollution from Surface Cleaning guidelines.

C.2.e. ► Rural Public Works Construction and Maintenance	
Does your municipality own/maintain rural <sup>1</sup> roads:	
<input checked="" type="checkbox"/> Y	Yes
<input type="checkbox"/> No	No
If your answer is <b>No</b> then skip to <b>C.2.f.</b>	
Place a <b>Y</b> in the boxes next to activities where applicable BMPs were implemented. If not applicable, type <b>NA</b> in the box and provide an explanation in the comments section below. Place an <b>N</b> in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.	
<input checked="" type="checkbox"/> Y	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
<input checked="" type="checkbox"/> Y	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
<input checked="" type="checkbox"/> Y	No impact to creek functions including migratory fish passage during construction of roads and culverts
<input checked="" type="checkbox"/> Y	Inspection of rural roads for structural integrity and prevention of impact on water quality
<input checked="" type="checkbox"/> Y	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
<input checked="" type="checkbox"/> Y	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
<input checked="" type="checkbox"/> Y	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: The Town owns nine open space areas, some of which have unpaved fire and utility roads. In coordination with a vegetation management project to reduce fire risk in Town-owned open spaces, the Town inspected and improved the fire and utility roads as needed to reduce erosion, correct slope, and reduce runoff impacts.	

<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.

<b>C.2.f. ► Corporation Yard BMP Implementation</b>				
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: The Town revised its SWPPP in June 2018 and follows its SWPPP during its Corp Yard inspections. On September 28, 2018, the Town staff inspected Town's Corp Yard and required maintenance crew to replace opened gravel and sand bags, and clean up the spilled soil from open bags. Re-inspection was conducted on October 12, 2018 and found all deficiencies were corrected. No discharge of sewage and wash water occurred; all trash and green waste were contained in dumpsters as required; catch basins were cleaned and not clogged; and trash and storage areas were orderly with all containers properly capped and sealed. The Corporation Yard drainage was confirmed to be running properly with no discharge and the catch basins were free of non-stormwater discharge. Detailed inspection findings and follow-up are listed in the Table below.				
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
Town of Hillsborough Corporation Yard	General housekeeping	September 28, 2018	In compliance, no action required.	No action required.
Town of Hillsborough Corporation Yard	Vehicle/equipment washing	September 28, 2018	In compliance, no action required. Planning to construct new roof over wash area. Design anticipated in FY 19-20.	No action required.

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

**FY 2018-2019 Annual Report**  
**Permittee Name: Town of Hillsborough**

**C.2 – Municipal Operations**

Town of Hillsborough Corporation Yard	Municipal vehicle, heavy equipment, and employee parking	September 28, 2018	In compliance, no action required.	No action required.
Town of Hillsborough Corporation Yard	Outdoor waste/recycling storage	September 28, 2018	In compliance, no action required.	No action required.
Town of Hillsborough Corporation Yard	Outdoor material storage	September 28, 2018	Open gravel and sand bags need to be replaced and clean up the spilled soil from open bags required.	Re-inspected on October 12, 2018 and site found to be in compliance.

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.  
 The Town approved one regulated project in FY 18-19 and information is provided in Table C.3.b.iv. (2).

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

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
Comments (optional): The Town has not received any projects requesting alternative or in-lieu compliance. The Town may decide to allow alternative compliance in the future on a case-by-case basis and after making a determination of whether alternative compliance is available/feasible.				

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

1. In FY 2018-19, has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
2. In FY 2018-19, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the <b>C.3.b.iv.(2)</b> Table, and the <b>C.3.e.v.</b> Table.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If you answered "Yes" to either question, 1) Complete Table C.3.e.v. 2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project. The Town of Hillsborough has not received any permit applications for a project that has been identified as a potential Special Project in FY 2018/19.				

**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 system or HM controls were installed in FY 18-19.

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

Site Inspections Data	Number/Percentage
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the previous fiscal year (FY17-18)	2
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the reporting period (FY 18-19)	2
Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 18-19)	2
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 18-19)	100% <sup>3</sup> . The Town has only 2 regulated projects for which O & M verification inspection were conducted during FY 18-19. Per the permit, only 20% are required to be inspected each year. However, 100% of the inspection were conducted in FY 18-19.

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

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

Provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.
Summary: The Town is almost exclusively zoned single family residential. Third party inspection company under direction of the Town staff inspected located Bioswale located at the Nueva School and Sump-Pump located at Crystal Springs Upland School. Third party inspection reports detailing the inspection date, condition of these BMPs were satisfactory and no issues were identified.
Provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness program).
Summary: The Town's O&M Inspection Program remains effective due to regular inspection and maintenance of these Stormwater Treatment Systems. The Town will continue to conduct O&M inspections annually, or as frequently as directed by the Regional Board. This reporting year, the Town contracted with a third-party consultant to conduct the required inspection. A licensed vault inspection company inspected the underground vault at Crystal Springs Uplands School and bioswales at Nueva School.

**C.3.i. ☐ Required Site Design Measures for Small Projects and Detached Single Family Home Projects**

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.
Summary: BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Permittees. We have modified local ordinances/policies/procedures and forms/checklists to require all applicable projects approved after December 1, 2012 to implement at least one of the site design measures listed in Provision C.3.i.

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

(For FY 2018-19 Annual Report only) Did your agency complete a Green Infrastructure Plan?	<b>Y</b>	<b>Yes, see attached Green Infrastructure Plan</b>	<b>No</b>
If No, provide schedule for completion: The approved GI Plan can be found here: <a href="https://www.hillsborough.net/493/Stormwater-Management-Green-Infrastructu">https://www.hillsborough.net/493/Stormwater-Management-Green-Infrastructu</a> .			



<b>C.3.j.i.(5).(c) ☐ Legal Mechanisms</b>			
<i>(For FY 2018-19 Annual Report only)</i> Does your agency have legal mechanisms in place to ensure implementation of the Green Infrastructure Plan?	<b>Y</b>	<b>Yes, see attached documents or links provided below</b>	<b>No</b>
<p><i>If Yes, describe the legal mechanisms in place and the documents attached or links provided.</i></p> <p>As part of GI Plan development process, the Town of Hillsborough has reviewed its existing polices, ordinances, and/or other legal mechanisms related to the implementation of stormwater NPDES permit requirements and found that it has sufficient legal authority to implement the GI Plan. The City Council approved this Plan on August 12, 2019 to further strengthen this authority. Descriptions of and links to documents demonstrating legal authority are provided in Chapter 10 of the GI Plan; regarding the Town's Municipal Code (10.2.2).</p>			
<p><i>If No, provide schedule for completion: NA</i></p>			

<b>C.3.j.i.(5)(d) ☐ Green Infrastructure Outreach</b>
<p>On an annual basis, provide a summary of your agency's outreach and education efforts pertaining to Green Infrastructure planning and implementation.</p>
<p>Summary:</p> <p>The Town of Hillsborough staff conducted Green Infrastructure Outreach in coordination with its development and approval of the Green Infrastructure planning and implementation. Outreach was conducted for three type of audiences – the general public, staff, and elected officials.</p> <p>Public and elected official outreach began in May 3, 2017, with the approval of the Green Infrastructure Workplan. On March11, 2019, City staff and consultants provided a status update on development of the GI Plan to City Council. The GI Plan was brought back to City Council on August 12, 2019 for approval. A draft GI Plan was posted on the Town website in advance of the August Council Meeting for review and comment by City Council members and the public.</p> <p>Interdepartmental coordination and staff training efforts included:</p> <ul style="list-style-type: none"> <li>• Regular communication between management and appropriate department staff to discuss GI requirements and the GI Plan development.</li> <li>• Discussion of the potential for incorporation of GI on capital projects.</li> <li>• Participation in SMCWPPP training events.</li> </ul>

For more information about outreach conducted in coordination with the GI Plan development, refer to Chapter 9 of the Town's GI Plan. Please refer to the SMCWPPP FY 2018/19 Annual Report for a summary of outreach efforts implemented at the Countywide level.

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

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

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

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

The Town of Hillsborough utilized the procedures outlined in the BASMAA "Guidance for Identifying Green Infrastructure (GI) Potential in Municipal Capital Improvement Program (CIP) projects" (May 6, 2016) to identify and review potential green infrastructure projects from the list of CIPs. None of the projects were identified as having a potential for GI based on the preliminary screening, and feasibility since all the projects defined in CIP are either maintenance or utility projects. Refer to Section 10.4.2 and Appendix C of the GI Plan.

Town staff also participated in the SMCWPPP Green Infrastructure Committee.

Summary of Planning or Implementation Status of Identified Projects:  
 See attached Tables C.3.j.ii.(2)-A and C.3.j.ii.(2)-B for the required information.

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

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

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

Please refer to SMCWPPP FY 2018/19 Annual Report for: 1) a summary of efforts conducted to help regional, State, and federal agencies plan,

design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects; and 2) a plan and schedule for new and ongoing efforts to participate in processes to promote green infrastructure.

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

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

*(For FY 2018-19 Annual Report only)* Submit the tracking methods used and report implementation of green infrastructure measures including treated area, and connected and disconnected impervious area on both public and private parcels within their jurisdictions.

Please refer to the SMCWPPP FY 2018/19 Annual Report for: 1) a summary of methods being developed to track and report implementation of green infrastructure measures; and 2) a report on green infrastructure measures implemented to date, including acres of impervious area (total and treated), countywide and by Permittee.

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

Project Name Project No.	Project Location <sup>4</sup> , Street Address	Name of Developer	Project Phase No. <sup>5</sup>	Project Type & Description <sup>6</sup>	Project Watershed <sup>7</sup>	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft <sup>2</sup> ) <sup>8</sup>	Total Replaced Impervious Surface Area (ft <sup>2</sup> ) <sup>9</sup>	Total Pre-Project Impervious Surface Area <sup>10</sup> (ft <sup>2</sup> )	Total Post-Project Impervious Surface Area <sup>11</sup> (ft <sup>2</sup> )
<b>Private Projects</b>											
Nueva Middle School	6565 Skyline Blvd, Hillsborough	Lake Street Ventures	Phase 1	School	Sanchez	5.63	5.63	46,639	32,505	57,479	79,144
<b>Public Projects</b>											
None	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Comments: NA											

**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>12</sup>	Application Final Approval Date <sup>13</sup>	Source Control Measures <sup>14</sup>	Site Design Measures <sup>15</sup>	Treatment Systems Approved <sup>16</sup>	Type of Operation & Maintenance Responsibility Mechanism <sup>17</sup>	Hydraulic Sizing Criteria <sup>18</sup>	Alternative Compliance Measures <sup>19/20</sup>	Alternative Certification <sup>21</sup>	HM Controls <sup>22/23</sup>
<b>Private Projects</b>										
Nueva Middle School – Phase 1	11/29/2017	4/26/2019	1. Plumb interior floor drains to sanitary sewer. 2. Landscaping. 3. Connect Grease interceptor to sanitary sewer. 4. Fire sprinkler to sanitary sewer or landscape area.	1. Direct roof runoff into cisterns or rain barrels. 2. Direct roof runoff onto vegetated areas. 3. Direct runoff from sidewalks, walkways, and/or patios onto vegetated areas.	1. Rainwater harvesting for indoor non-potable water use. 2. Flow-through planter.	Nueva Middle School	1. 1.b & 1.2.c	No	NA	HM requirements met through Town of Hillsborough detention requirements. The difference in the post-project discharge and the

<sup>4</sup>Include cross streets  
<sup>5</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>6</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>7</sup>State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.  
<sup>8</sup>All impervious surfaces added to any area of the site that was previously existing pervious surface.  
<sup>9</sup>All impervious surfaces added to any area of the site that was previously existing impervious surface.  
<sup>10</sup>For redevelopment projects, state the pre-project impervious surface area.  
<sup>11</sup>For redevelopment projects, state the post-project impervious surface area.  
<sup>12</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>13</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>14</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>15</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>16</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>17</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>18</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>19</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>20</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>21</sup>Note whether a third party was used to certify the project design complies with Provision C.3.d.  
<sup>22</sup>If HM control is not required, state why not.  
<sup>23</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 (private projects)**

Project Name Project No.	Application Deemed Complete Date <sup>12</sup>	Application Final Approval Date <sup>13</sup>	Source Control Measures <sup>14</sup>	Site Design Measures <sup>15</sup>	Treatment Systems Approved <sup>16</sup>	Type of Operation & Maintenance Responsibility Mechanism <sup>17</sup>	Hydraulic Sizing Criteria <sup>18</sup>	Alternative Compliance Measures <sup>19/20</sup>	Alternative Certification <sup>21</sup>	HM Controls <sup>22/23</sup>
				4. Conserve natural areas. 5. Minimize impervious surfaces 6. Self-treating areas. 7. Construct bike lanes, driveways, and/or uncovered parking lots with pervious surfaces.						pre-project 10-year are being detained on-site.

**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>24</sup>	Date Construction Scheduled to Begin	Source Control Measures <sup>25</sup>	Site Design Measures <sup>26</sup>	Treatment Systems Approved <sup>27</sup>	Operation & Maintenance Responsibility Mechanism <sup>28</sup>	Hydraulic Sizing Criteria <sup>29</sup>	Alternative Compliance Measures <sup>30/31</sup>	Alternative Certification <sup>32</sup>	HM Controls <sup>33/34</sup>
<b>Public Projects</b>										
None	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Comments: NA										

<sup>24</sup>For public projects, enter the plans and specifications approval date.

<sup>25</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>26</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>27</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>28</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>29</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>30</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>31</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>32</sup>Note whether a third party was used to certify the project design complies with Provision C.3.d.

<sup>33</sup>If HM control is not required, state why not.

<sup>34</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>35</sup> Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)**

Fill in table below or attach your own table including the same information.  
 In Town of Hillsborough, no new stormwater treatment systems or HM controls were installed in FY 18-19.

Name of Facility	Address of Facility	Party Responsible <sup>36</sup> For Maintenance	Type of Treatment/HM Control(s)
NA	NA	NA	NA

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

**Reporting Period – July 1 2018 - June 30, 2019**

In Town of Hillsborough, no special projects were submitted or approved installed in FY 18-19.

Project Name & No.	Permittee	Address	Application Submittal Date <sup>37</sup>	Status <sup>38</sup>	Description <sup>39</sup>	Site Total Acreage	Gross Density DU/Acre	Density FAR	Special Project Category <sup>40</sup>	LID Treatment Reduction Credit Available <sup>41</sup>	List of LID Stormwater Treatment Systems <sup>42</sup>	List of Non-LID Stormwater Treatment Systems <sup>43</sup>
None	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

<sup>35</sup> "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

<sup>36</sup> State the responsible operator for installed stormwater treatment systems and HM controls.

<sup>37</sup> Date that a planning application for the Special Project was submitted.

<sup>38</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>39</sup> Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

<sup>40</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>41</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>42</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>43</sup> List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.



**Special Projects Narrative: NA**

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

Project Name and Location <sup>44</sup>	Project Description	Status <sup>45</sup>	GI Included? <sup>46</sup>	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement <sup>47</sup>
Darrell Tank Improvements	Replace tanks	Design anticipated in FY 19/20 and construction in FY 21/22	TBD	Incorporation / Feasibility of GI measures will be evaluated in the study and implemented to the maximum extent practicable during the permit term
Macadamia Storm Drain	Channel modification	Design anticipated in FY 19/20 and construction in FY 20/21	TBD	Incorporation / Feasibility of GI measures will be evaluated in the study and implemented to the maximum extent practicable during the permit term.
Sandra/Hayne Storm Drain Repair Study	Repair study	Design to continue through FY 18/19 and construction is anticipated in FY 19/20.	No	GI is impractical due to space constraints
Spencer Lake Outfall System Replacement	To replace the outlet piping from the lake to the creek	Design anticipated in FY 19/20 and construction in FY 20/21	TBD	Will review if GI measures can be implemented to the maximum extent practicable during the permit term.
Storm Water Master Plan Improvements	To repair deficient storm drain system facilities	Design & construction as identified during facility inspections - ongoing	TBD	Incorporation / Feasibility of GI measures will be evaluated in the study and implemented to the maximum extent practicable during the permit term.

<sup>44</sup> List each public project that is going through your agency's process for identifying projects with green infrastructure potential.

<sup>45</sup> Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.

<sup>46</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>47</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>48</sup>	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
None	NA	NA	NA

<sup>48</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:  
The Town is almost exclusively zoned single-family residential and does not have any industrial and commercial developments. The Town does have public and private schools, fire stations, and a corporation yard that are institutional and government facilities.  
In FY 18-19, the Town reviewed their list of potential facilities requiring stormwater inspections and concluded that all facilities should be assigned medium category. Medium category facilities require inspection every three years and these potential facilities for stormwater inspections were inspected in FY 17-18, therefore, none of these facilities required stormwater inspection in this fiscal year.  
  
The Town also reviewed its business license list to verify if any new facilities needed to be added to the potential list of facilities for stormwater inspections. There were none new to be added.  
  
Refer to the C.4 Industrial and Commercial Site Controls section of the SMCWPPP FY 18-19 Annual Report for a description of Program activities.

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

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

1. Burlingame Country Club – 80 New Place Road, Hillsborough, CA
2. Crystal Springs Uplands School – 400 Uplands Drive, Hillsborough, CA
3. Fire Station #32 – 330 Ascot Road, Hillsborough, CA
4. Fire Station #33 – 835 Chateau Drive, Hillsborough, CA
5. Hillsborough Corporation Yard – 1320 La Honda Road, Hillsborough, CA
6. Multi-Purpose Building – 303 El Cerrito, Hillsborough, CA
7. North Hillsborough School – 545 Eucalyptus Ave, Hillsborough, CA
8. Nueva School – 6565 Skyline Boulevard, Hillsborough, CA
9. PG&E Carolands Substation – South of Darrell Road and Pullman Road (Access from Skyline Boulevard), Hillsborough, CA
10. West Elementary School – 376 Barbara Way, Hillsborough, CA
11. William Crocker Intermediate School – 2600 Ralston Avenue, Hillsborough, CA
12. Hillsborough City School District – 300 El Cerrito Ave, Hillsborough, CA

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

Fill out the following table or attach a summary of the following information. Indicate your reporting methodology below.	
<input checked="" type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
<input type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.
	<b>Number</b>
Total number of inspections conducted (C.4.d.iii.(2)(a))	NA
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))	NA
Comments: Site inspections not required per the BIP.	

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

Fill out the following table or attach a summary of the following information.		
	<b>Enforcement Action</b> (as listed in ERP) <sup>49</sup>	<b>Number of Enforcement Actions Taken</b>
Level 1	Verbal Warning	NA
Level 2	Notice of Violation	NA
Level 3	Notice of Comply	NA
Level 4	Administrative Action / Stop Work Notice	NA
Level 5	Legal Action	NA
<b>Total</b>		

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

Fill out the following table or attach a summary of the following information.		
<b>Business Category<sup>50</sup></b>	<b>Number of Actual Discharges</b>	<b>Number of Potential Discharges</b>
Hazardous Materials		NA
Food		NA
Other		NA

**C.4.d.iii.(2)(e) ▶ Non-Fileers**

List below or attach a list of the facilities required to have coverage under the Industrial General Permit but have not filed for coverage:
There are no industrial or commercial facilities in the Town of Hillsborough.

<sup>49</sup>Agencies to list specific enforcement actions as defined in their ERPs.

<sup>50</sup>List your Program's standard business categories.

**C.4.e.iii ► Staff Training Summary**

Training Name	Training Dates	Topics Covered	No. of Industrial/ Commercial Site Inspectors in Attendance	Percent of Industrial/ Commercial Site Inspectors in Attendance	No. of IDDE Inspectors in Attendance	Percent of IDDE Inspectors in Attendance
NA	NA	NA	NA	NA	NA	NA

Comments:  
 Town staff attended an in-house Hazard Communication Training on hazardous chemicals training, labeling and safety, assessments and exposure control.

Town of Hillsborough was not required to conduct CII inspections this year. Town staff will attend next year in preparation for the following year inspections as required by the Town's BIP.

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

**Program Highlights and Evaluation**

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

Provide background information, highlights, trends, etc.

Summary:

The Town identifies and reports illicit discharges during routine stormwater system inspections and through observations by municipal maintenance staff and Town residents. The SmartCover® management tool is utilized by Town Staff for its sanitary sewer system. The SmartCover® is a self-contained, wireless level monitoring system with immediate alarming and historical data logging capabilities. The immediate alarming is based on high water level along with historical water level data trending, enabling the Town staff to dispatch for assessment to prevent illicit discharges. The Town also utilizes a smartphone application SeeClickFix for the public to report any potential detection of illicit discharge.

In addition, the police department, public works department maintenance crews, public works department inspector or designee, and/or central county fire department report to the location and conduct necessary assessment and corrective BMPs for any identification and reports of illicit discharges. All corrective BMPs required are completed in a timely manner. At time of incident, the Town Inspector would provide an overview of the situation and distribute SMCWPPP BMP materials on illicit discharge to cease the discharge. Details of further enforcement procedures implemented are provided in the ERP.

Town Staff participates in SMCWPPP's Commercial/Industrial and Illicit Discharge Subcommittee meetings on a regular basis. Refer to the C.5. Illicit Discharge Detection and Elimination section of countywide program's FY 18-19 Annual Report for description of activities at the countywide or regional level.

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

Summary of any changes made during FY 18-19.  
 Information provided as in FY 17-18 is as listed below and this is current information. No changes have been made.  
 General number: 650 375 7444; Emergency PD Dispatch & Contact number: 650 375 7470.

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

Comments:  
 No spills or discharges were reported in FY 18-19. For tracking Spill and Discharge Complaint Tracking, SeeClickFix website is used.

**C.5.e.iii.(2) ► Control of Mobile Sources**

(a) Provide changes to your agency's minimum standards and BMPs for each of the various types of mobile businesses since the 2017 Annual Report (C.5.e.iii.(2)(a))

The Town of Hillsborough follows the minimum standards and BMPs described in the "Best Management Practices for Mobile Businesses" fact

<p>sheet recently updated by the SMCWPPP CII Subcommittee in April 2019 for the following categories: automobile washers/detailers, power washers, carpet cleaners, steam cleaners, pet care services. The format of the fact sheet was updated but there have been no changes to the BMPs since the 2017 Annual Report.</p>
<p>(b) Provide changes to your agency's enforcement strategy for mobile businesses (C.5.e.iii.(2)(b))</p> <p>If inspectors and/or other staff find mobile businesses improperly discharging wash water to the street, gutter, storm drain etc. through a complaint investigation or during routine field work, they issue enforcement actions and track the facility through Town's IDDE spill and discharge complaint tracking system in accordance with MRP C.5.d.</p> <p>Since FY 2013/2014 SMCWPPP's enforcement strategy has been to track mobile business enforcement actions from SMCWPPP permittees in a Table available on the SMCWPPP CII members only webpage. The tracking table is periodically updated.</p>
<p>(c) Provide minimum standards and BMPs developed for additional types of mobile businesses addressed since 2017 Annual Report (C.5.e.iii.(2)(c))</p> <p>SMCWPPP has not developed minimum standards and BMPs for any additional types of mobile businesses other than those described in (a) above.</p>
<p>(d) Provide a list and summary of the specific outreach events and education conducted to each type of mobile business operating within your jurisdiction during the Permit term (C.5.e.iii.(2)(d)):</p> <p>Refer to the C.5 Illicit Discharge Detection and Elimination section of SMCWPPP FY 2018/19 Annual Report for description of activities at the countywide or regional level.</p>
<p>(e) Discuss inspections conducted at mobile businesses and/or job sites (C.5.e.iii.(2)(e))</p> <p>The Town of Hillsborough conducts inspections of mobile businesses only if the business is reported to Town staff through the C.5 Illicit Discharge Detection and Elimination Program, or if identified as not implementing proper BMPs during Town staff's routine fieldwork. No such inspections were reported during FY 18-19, because no referrals were received through the C.5 program or routine fieldwork. The Town does not otherwise routinely inspect mobile businesses.</p>
<p>(f) List below or attach the list of mobile businesses operating within your agency's jurisdiction (C.5.e.iii.(2)(f))</p> <p>In FY 2016-17 SMCWPPP compiled an inventory of mobile businesses located in San Mateo County. The inventory was developed by reviewing lists provided by individual agencies, yellow page searches and online business searches. The inventory includes automobile washing, steam cleaning, power washing, pet care services and carpet cleaning mobile businesses. The inventory is periodically updated with mobile businesses stormwater inspectors observe during routine field activities, including responding to illicit discharges. The inventory is made available to all San Mateo County Permittees on the SMCWPPP CII members only webpage. The inventory is included in SMCWPPP's FY 2018-19 Annual Report and currently has approximately 175 mobile businesses.</p>
<p>(g) Discuss enforcement actions taken against mobile businesses during the Permit term (C.5.e.iii.(2)(g))</p> <p>Enforcement actions are typically taken in response to a complaint or illicit discharge through Town's IDDE Program. Enforcement actions are tracked in the Town's spill and discharge complaint tracking system required by MRP Provision C.5.d.ii. In FY 18-19 there were no incidents were reported to the Town, therefore, no enforcement actions were required.</p>

**C.5.f.iii ► MS4 Map Availability**

<p>Discuss how you make your MS4 map available to the public and how you publicize the availability of the MS4 map.</p> <p>MS4 map is available to the public on the Oakland Museum Creek Mapping Project website (<a href="http://explore.museumca.org/creeks/crkmap.html">http://explore.museumca.org/creeks/crkmap.html</a>). This map includes Town's storm drains that measures 24 inches or greater in diameter. The Town also have this map for public view at the Town Hall.</p>
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Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(3)(a), (b), (c), (d) Site/Inspection Totals			
Number of active Hillside Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii.3.a)	Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii. 3.c)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.3.b)	Total number of storm water runoff quality inspections conducted (include only Hillside Sites, High Priority Sites and sites disturbing 1 acre or more) (C.6.e.iii. 3.d)
<b>22</b>	<b>36</b>	<b>3</b>	<b>261</b>
<p>Comments:</p> <p>The data reported above is extracted from the completed Construction Inspection Tracking Table developed by the SMCWPPP. The sites defined as high priority due to reasons other than site slope are located in close proximities to creeks. In addition to monthly inspections, periodic inspections were also conducted.</p> <p>Other construction sites that do not fall in the above categories were also inspected. All of these other sites are private development sites that range from small landscape and remodel projects to new single-family dwellings which are not high priority sites and are less than 1 acre in size.</p> <p>24 violations were resolved within 10 days.</p> <p><b>Provide the number of inspections that are conducted at sites not within the above categories as part of your agency’s inspection program and a general description of those sites, if available or applicable.</b></p> <p>Two other sites (25 Bridge and 1850 Ralston) were also inspected during in FY 2018/19. Site 25 Bridge was inspected once and site 1850 Ralston 10 times in FY 2018/19. Both projects disturbed less than one acre.</p>			

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

	<b>Enforcement Action</b> (as listed in ERP) <sup>51</sup>	<b>Number Enforcement Actions Issued</b>
Level 1 <sup>52</sup>	Verbal Warning	41
Level 2	Notice of Violation	22
Level 3	Notice of Comply	18
Level 4	Administrative Action / Stop Work Notice	1
Level 5	Legal Action	0
<b>Total</b>		<b>82</b>

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

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

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

Indicate your reporting methodology below.	
<input checked="" type="checkbox"/>	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
<input type="checkbox"/>	Permittee reports the total number of discrete potential and actual discharges on each site.
	<b>Number</b>
<b>Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered</b> or otherwise considered corrected in a timely period (C.6.e.iii. .3.g)	24
<p><b>Comments:</b>                  24 violations were resolved within 10 days and all but one, a new single-family home at 165 Woodridge Rd, were resolved within 30 days. Enforcement actions escalated weekly when sites were not in compliance with 10 days. Inspections at 165 Woodridge Rd were conducted weekly and enforcement actions escalated with each inspection. Erosion and sediment control maintenance improved with each inspection. Most violations at this location were due to the need for continuous maintenance of silt fences and wattles at different locations each week on site.</p>	

<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: The violations were minor in nature. There were no illicit discharges reported. Typically, the violators failed to maintain their erosion control and sediment control BMPs and have materials on site that needed to be replaced or improved, which was similar to inspection findings in the previous fiscal years. Several violators failed to install sediment controls in key locations (e.g. on slopes, along curb and gutters, and on grade breaks), which were identified by inspectors and corrected by the contractors in a timely manner.

**C.6.e.iii.(4) Evaluation of Inspection Program Effectiveness**

Describe what appear to be your program's strengths and weaknesses, and identify needed improvements, including education and outreach.

Description:  
 The Public Works and Building Department work together to provide an effective inspection program that ensures all sites categorized as high priority sites are in full compliance with the MRP. In addition, both departments continue to implement MRP requirements for almost all sites, not just those categorized as hillside lots or high priority. Inspectors complete the most up to date Construction Site Inspection Report and file copies of the report in each project folder. Inspections are also recorded in a shared network tracking file so that communication between all departments is maintained. If BMP issues are identified during an inspection, a follow-up inspection is performed one week after enforcements are issued to ensure that necessary corrections are made. Most contractors made necessary corrective measures within a timely manner and were willing to work with the Town to resolve concerns. The Town continues to maintain good relationships with contractors, developers, applicants, and homeowners and convey the significance of working together to ensure appropriate erosion and sediment control measures are in place.

Town staff continues to participate in the Countywide Program's New Development Subcommittee. Implementation of the most up-to-date Construction Best Management Practices plan sheet is required to be included as part of the permit plan set for all projects.

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

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

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance
SWCWPPP Construction Site Stormwater Inspector Training	March 11, 2019 SWCWPPP	Implementing requirements of provision C.6; Construction General Permit context; CalTrans Experience; and Group exercise.	One staff member from the Town of Hillsborough attended. CSG Consultants is a third-party

			consultant who conducts the site stormwater inspections for the Town. Seven CSG Consultants employees attended. Attendance lists is also available on the SMCWPPP website.
New Development Subcommittee Meeting (this meeting also covered C.6 Provision)	August 14, 2018; November 13, 2018; February 12, 2019; May 14, 2019	Implementing requirements of provision C.6	One staff member from the Town of Hillsborough attended each meeting. One CSG Consultant also attended each workshop on behalf of the Town. Attendance lists is also available on the SMCWPPP website.

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

**C.7.b.i.1 Outreach Campaign**

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

Summary:  
 See Section 7 and Section 9 of the SMCWPPP FY 18-19 Annual Report for a description of outreach campaign activities conducted at the countywide level.  
 The Town also provides information via its website – <https://www.hillsborough.net/493/Stormwater-Management-Green-Infrastructure>.

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

No change.

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

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.  
 Use the following table for reporting and evaluating public outreach events  
 See Section 7 of the SMCWPPP FY 2018/19 Annual Report for a description of public outreach and citizen involvement events activities conducted at the countywide level.

Event Details	Description (messages, audience)	Evaluation of Effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional. Indicate if event is public outreach or citizen involvement.	Identify type of event (e.g., school fair, creek clean-up, storm drain stenciling, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscape presentation, pesticides, stormwater awareness)	Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as: <ul style="list-style-type: none"> <li>• Success at reaching a broad spectrum of the community</li> <li>• Number of participants compared to previous years.</li> <li>• Post-event effectiveness assessment/evaluation results</li> <li>• Quantity/volume of materials cleaned up, and comparisons to previous efforts</li> </ul>
California Coastal Cleanup Day in San Mateo County (September 15, 2018 in 30 San Mateo County locations)	Coastal Cleanup Day is an international volunteer event focused on cleaning up the marine environment and raising awareness	Refer to the C.7 Public Information and Outreach section of the SMCWPPP's FY 18-19 Annual Report.

	about coastal pollution. Participants include school age children, local families, and residents.	
San Mateo County Fair (June 8-16, 2019)	As a collaborative effort, the Countywide program hosted an informational booth for stormwater runoff pollution prevention.	Refer to the C.7 Public Information and Outreach section of the SMCWPPP's FY 18-19 Annual Report.

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

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

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:  
 See Section 7 of the SMCWPPP FY 18-19 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 2018/19 Annual Report for a description of school-age children outreach efforts conducted at the countywide level.

The Town partners with the Bay Area Water Supply and Conservation Agency (BAWSCA) to administer a school assembly program to educate grade school children about the source of their water supply and the importance of water conservation each year. Although outreach was provided, none of the schools scheduled an assembly. In FY 19-20, the Town will mail a letter to the schools encouraging them to participate in the program.

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.
Refer to the C.7 Section of the countywide program's FY 18-19 Annual Report for a description of School-age Children Outreach efforts conducted at the countywide level.	Refer to the C.7 Section of the countywide program's FY 18-19 Annual Report for a description of School-age Children Outreach efforts conducted at the countywide level.	Refer to the C.7 Section of the countywide program's FY 18-19 Annual Report for a description of School-age Children Outreach efforts	Refer to the C.7 Section of the countywide program's FY 18-19 Annual Report for a description of School-age Children Outreach efforts conducted at the countywide level.

		conducted at the countywide level.	
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Section 9 – Provision C.9 Pesticides Toxicity Controls

<b>C.9.a. Implement IPM Policy or Ordinance</b>							
Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?				<input checked="" type="checkbox"/> X	Yes	<input type="checkbox"/>	No
If no, explain:							
Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and <b>suggest reasons for increases in use of pesticides that threaten water quality</b> , specifically organophosphates, pyrethroids, carbamates fipronil, indoxacarb, diuron, and diamides. A separate report can be attached as evidence of your implementation.							
<b>Trends in Quantities and Types of Pesticide Active Ingredients Used<sup>53</sup></b>							
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>	0	0	0	0			
Active Ingredient Chlorpyrifos		NA	NA	NA			
Active Ingredient Diazinon		NA	NA	NA			
Active Ingredient Malathion		NA	NA	NA			
<b>Pyrethroids (see footnote #54 for list of active ingredients)</b>	0	0	0	0			
Active Ingredient Type X		NA	NA	NA			
Active Ingredient Type Y		NA	NA	NA			
<b>Carbamates</b>	0	0	0	0			
Active Ingredient Carbaryl		NA	NA	NA			
Active Ingredient Aldicarb		0	0	0			
<b>Fipronil</b>	Reporting not required in FY 15-16	NA	NA	NA			

<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.

Pesticide Category and Specific Pesticide Active Ingredient Used	Amount					
	FY 15-16	FY 16-17	FY 17-18	FY 18-19	FY 19-20	FY 20-21
Indoxacarb	Reporting not required in FY 15-16	Reporting not required in FY 15-16	NA	NA		
Diuron	Reporting not required in FY 15-16	Reporting not required in FY 15-16	NA	NA		
Diamides	Reporting not required in FY 15-16	Reporting not required in FY 15-16	0	0		
Active Ingredient Chlorantraniliprole			NA	NA		
Active Ingredient Cyantraniliprole			NA	NA		
<b>Reasons for increases in use of pesticides that threaten water quality:</b> NA						
<p><b>IPM Tactics and Strategies Used:</b>                      The Town's most commonly used IPM Tactics and Strategies in FY 18-19 on all municipal structural and landscaped areas by contractors are listed below:</p> <ul style="list-style-type: none"> <li>• Use of non-chemical strategies such as monitoring, mowing weeds, mulching</li> <li>• Removal of plants that require frequent pesticide applications</li> <li>• Replacing invasive plants with natives</li> <li>• Preventive actions such as sealing holes and gaps in structures, improving sanitation</li> <li>• Use of baits and traps instead of broadcast pesticides.</li> </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.	0
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	0
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within this reporting year.	0%
Type of Training: Local tailgate meetings are held for staff to train on the IPM policy and IPM standard operating procedures. These trainings are held annually, prior the summer season. The Town held a pesticide training on 4/23/19. While 12 staff members within the Streets, Sewer, and	

Storm Divisions attend the training, none of the Town staff members applied pesticides. Only Town hired and certified service providers apply pest control.  
 The Town staff also participated in SWCWPPP Landscape IPM Continuing Education Workshop which was held on April 16, 2019.

**C.9.c Require Contractors to Implement IPM**

Did your municipality contract with any pesticide service provider in the reporting year, for either landscaping or structural pest control?	<input checked="" type="checkbox"/>	<b>Yes</b>		<b>No</b>
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	<input checked="" type="checkbox"/>	<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 Town staff conducts pre construction meetings with the certified hired service provider, reviews pesticides used, and reviews monthly reports provided by the certified hired service provider.				

**C.9.d Interface with County Agricultural Commissioners**

Did your municipality communicate with the County Agricultural Commissioner to: (a) get input and assistance on urban pest management practices and use of pesticides or (b) inform them of water quality issues related to pesticides.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If yes, summarize the communication. If no, explain. See Section 9 of the SMCWPPP FY 2018/19 Annual Report for a summary of the Countywide Program's coordination with the San Mateo County Agricultural Commissioner.				
Did your municipality report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire.	<input type="checkbox"/>	<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>
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. NA				

**C.9.e.ii (1) Public Outreach: Point of Purchase**

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); **OR** reference a report of a regional effort for public outreach in which your agency participates.

Summary:  
 See Section 9 of the SMCWPPP FY 2018/19 Annual Report for a description of point of purchase public outreach efforts conducted at the countywide level and regionally.

**C.9.e.ii (2) ☐ Public Outreach: Pest Control Contracting Outreach**

Provide a summary of outreach to residents who use or contract for structural pest control and landscape professionals); **AND/OR** reference a report of a regional effort for outreach to residents who hire pest control and landscape professionals in which your agency participates.

Summary: See the C.9 Pesticides Toxicity Control section of Countywide Program's FY 18-19 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

See Section 9 of the SMCWPPP FY 2018/19 Annual Report for a summary of outreach to residents who hire pest control and landscape professionals.

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

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

Summary:  
See Section 9 of the SMCWPPP FY 2018/19 Annual Report for a summary of the Countywide Program's outreach to pest control operators and landscapers to reduce pesticide use.

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

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

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

**C.9.g. ☐ Evaluate Implementation of Pesticide Source Control Actions**

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

Summary:

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

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

Section 10 - Provision C.10 Trash Load Reduction

**C.10.a.i ► Trash Load Reduction Summary**

For population-based Permittees, provide the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the reduction percentage on the information presented in C.10.b i-iv and C.10.e.i-ii. Provide a discussion of the calculation used to produce the reduction percentage

Trash Load Reductions	
Percent Trash Reduction in All Trash Management Areas (TMAs) due to <b>Trash Full Capture Systems</b> (as reported C.10.b.i)	NA
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>55</sup>	NA
Percent Trash Reduction due to <b>Jurisdictional-wide Source Control Actions</b> (as reported in C.10.b.iv)	NA
<b>SubTotal for Above Actions</b>	<b>NA</b>
Trash Offsets (Optional)	
Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.e.i)	NA
Offset Associated with Direct Trash Discharges (as reported in C.10.e.ii)	NA
<b>Total (Jurisdictional-wide) % Trash Load Reduction through FY 2018-19</b>	100%* (no adverse impacts)
<p><b>Discussion of Trash Load Reduction Calculation and Attainment of the 80% Mandatory Deadline:</b>                      The Town attained and reported 100% trash load reduction (including trash offsets) in its FY 17-18 Annual Report. During FY 18-19, the Town continued to implement a robust trash control measure program. This helped the Town maintain its trash load reduction above the mandatory 80% trash load reduction requirement included in the MRP. The total (jurisdiction-wide) percent trash load reduction in FY 18-19 is again 100% (including trash offsets). The most recent version of the Town's Baseline Trash Generation Map can be downloaded at <a href="https://www.flowstobay.org/content/municipal-trash-generation-maps">https://www.flowstobay.org/content/municipal-trash-generation-maps</a>.</p>	

\*All jurisdictional land areas in the Town of Hillsborough are generating very low levels of trash (i.e., green on the baseline trash generation map) and therefore the Town has achieved a 100% trash reduction level (i.e., no adverse impacts or full capture system equivalency), consistent with the NPDES Permit. The Town is exempt from the Minimum Full Trash Capture of the MRP Provision C.10.a.iii due to having a population and retail/wholesale commercial acreage of approximately 11,272 and 0, respectively.

<sup>55</sup> See Appendix 10-1 for changes between 2009 and FY 18-19 in trash generation by TMA as a result of Full Capture Systems and Other Measures.

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

Provide the following:

- 1) Total number and types of full capture systems (publicly and privately-owned) installed prior to FY 18-19, during FY 18-19, and to-date, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3.
- 2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for non-population based Permittees compared to the total required by the permit.

Type of System	# of Systems	Areas Treated (Acres)
<b>Installed in FY 18-19</b>		
<b>None</b>	NA	NA
<b>Installed Prior to FY 18-19</b>		
<b>None</b>	NA	NA
<b>Total for all Systems Installed To-date</b>	<b>NA</b>	<b>NA</b>
<b>Treatment Acreage Required by Permit (Population-based Permittees)</b>		<b>0*</b>
<b>Total # of Systems Required by Permit (Non-population-based Permittees)</b>		<b>NA</b>

\*Consistent with the MRP, the Town is exempt from the Minimum Full Trash Capture of the MRP Provision C.10.a.iii due to having a population of less than 12,000 and retail/wholesale commercial land use of less than 40 acres.

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

Provide the following:

- 1) Jurisdictional-wide trash reduction in FY 18-19 attributable to trash full capture systems implemented in each TMA;
- 2) The total number of full capture systems installed to-date in your jurisdiction;
- 3) The percentage of systems in FY 18-19 that exhibited significant plugged/blinded screens or were >50% full when inspected or maintained;
- 4) A narrative summary of any maintenance issues and the corrective actions taken to avoid future full capture system performance issues; and
- 5) A certification that each full capture system is operated and maintained to meet the full capture system requirements in the permit.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or >50% full in FY 18-19	Summary of Maintenance Issues and Corrective Actions
1	NA	0	NA	NA
2	NA			
<b>Total</b>				

**Certification Statement:** Not applicable.

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

Provide a summary of trash control actions other than full capture systems or jurisdictional source controls that were implemented within each TMA, including the types of actions, levels and areal extent of implementation, and whether actions are new, including initiation date.

TMA	Summary of Trash Control Actions Other than Full Capture Systems
1	<p>Trash Management Area #1 ("TMA #1") is part of State Highway 35 that was annexed to the Town. Trash problems were Categorized as low to moderate generation rate, as part of the Town's Long-Term Trash Load Reduction Plan, Page 17. TMA #1 runs parallel to State Highway 280, which is dominant source of trash transported by wind and traffic, and is Approximately 7 acres in size, making up approximately 0.18% of the Town acreage. TMA #1 is depicted on Figure 6, page 16 of the Town's Long- Term Trash Load Reduction Plan. Since TMA #1 has been identified to have a low to moderate generation rate, the Town has put greater focus on control measures in this area.</p> <p>A summary of measures implemented are below:</p> <ul style="list-style-type: none"> <li>• <b>On-land Cleanup:</b> The frequency of on-land trash cleanups is daily to weekly and is conducted by Town Staff as regular routine duties. The frequency is increased or immediately attended to if it becomes a public nuisance and/or emergency. In addition, increased on-land cleanup is performed under the Town's supervision with collaborate efforts with the Sheriff's Department and the Work Furlough Program.</li> <li>• <b>Anti-littering and illegal dumping enforcement activities:</b> Enforcement activities for anti-littering and illegal dumping are</li> </ul>



	<p>usually triggered by complaints and notification from the general public by the residents. The Town's Code Enforcement Division takes the lead on all reported illegal dumping and litter complaints and activities. The code enforcement process includes investigation, warning letters, citations, fines and court hearings. The Town's Municipal Code and the general Civil Laws provide the Town's Police and Code Enforcement Departments with the legal authority to respond to illegal dumping.</p> <ul style="list-style-type: none"> <li>• <b>Enforcement:</b> On average, anti-littering and illegal dumping with enforcement activities occurs at least once quarterly. In all applicable cases, police reports are prepared and forwarded to appropriate entities for possible fines or administrative fees.</li> <li>• <b>Improved Trash Bin/Container Management:</b> The Town has worked with the contracted refuse collection company to ensure that all residents have proper trash bins to accommodate the scheduled trash collection. In addition, the Town completes assessment during routine maintenance of public facilities to ensure that trash bins are adequate and if needed, to be replaced. The current container management for Town-operated facilities is disposed daily, depending upon volume. Appropriate container management is also enforced for all private development. Outreached is conducted during pre-construction meetings prior to permit issuance. Non-compliance triggers enforcement activities.</li> </ul> <p>A total of 2 assessments were performed at 2 sites in this TMA using the on-land visual assessment protocol. Approximately 2,100 linear feet (22%) of streets and sidewalks were assessed in this TMA. Only areas with M, H, or VH generation rates were assessed. For those areas assessed, 37% were L, 63% were M, 0% were H, and 0% were VH.</p>
<p>2</p>	<p>Trash Management Area #2 ("TMA#2") is approximately 3,944 acres which is about 99.5% of the Town and encompasses the Town's rural geography of zoned single-family residence and open spaces. TMA#2 is categorized with a low generation rate as shown on Figure 6 of the Town's Trash Management Area Map on Page 16 of the Long-Term Trash Load Reduction Plan. A summary of measures implemented are below:</p> <ul style="list-style-type: none"> <li>• <b>On-land Cleanup:</b> The frequency of on-land trash cleanups is daily to weekly and is conducted by Town Staff as regular routine duties. The frequency is increased or immediately attended to if it becomes a public nuisance and/or emergency. In addition, increased on-land cleanup is performed under the Town's supervision with collaborate efforts with the Sheriff's Department and the Work Furlough Program.</li> <li>• <b>Anti-littering and illegal dumping enforcement activities:</b> Enforcement activities for anti-littering and illegal dumping are usually triggered by complaints and notification from the general public by the residents. The Town's Code Enforcement Division takes the lead on all reported illegal dumping and litter complaints and activities. The code enforcement process includes investigation, warning letters, citations, fines and court hearings. The Town's Municipal Code and the general Civil Laws provide the Town's Police and Code Enforcement Departments with the legal authority to respond to illegal dumping.</li> <li>• <b>Improved Trash Bin/Container Management:</b> The Town has worked with the contracted refuse collection company to ensure that all residents have proper trash bins to accommodate the scheduled trash collection. In addition, the Town completes assessment during routine maintenance of public facilities to ensure that trash bins are adequate and if needed, to be replaced. The current container management for Town-operated facilities is disposed daily, depending upon volume. Appropriate container management is also enforced for all private development. Outreached is conducted during pre-construction meetings prior to permit issuance. Non-compliance triggers enforcement activities.</li> </ul> <p>No assessments were conducted in this TMA since this is a low trash generation TMA.</p>

**Summary of Trash Control Measures Other than Full Capture Devices:**

- **Street Sweeping:** Include a description of any enhancements or new actions implemented after the MRP 1.0 effective date (i.e., December 2009). Identify portions of the TMA where enhanced street sweeping (i.e., increased sweeping frequency) and parking enforcement above 2009 levels was implemented.
- **On-land Cleanup:** Include a description of on-land cleanup activities that began after the MRP 1.0 effective date (i.e., December 2009) and continued into FY 2018/19, including any enhancements or new actions implemented in FY 2018/19. Describe if these actions are Permittee or volunteer-led.
- **Partial Capture Devices:** Provide a description of devices installed after the MRP 1.0 effective date (i.e., December 2009). Describe the level of maintenance conducted per device types.
- **Storm Drain Inlet Cleaning:** Describe storm drain inlet maintenance activities implemented after the MRP 1.0 effective date (i.e., December 2009) and continued in FY 2018/19, including any enhancements or new maintenance activities implemented in FY 2018/19. For new/enhanced actions, include the number of inlets where enhanced maintenance occurred, and the increased frequency of maintenance.
- **Uncovered Loads:** Describe activities designed to reduce trash from uncovered loads that began after the MRP 1.0 effective date (i.e., December 2009) and continued in FY 2018/19, including any enhancements or new actions implemented in FY 2018/19. Describe the types of actions implemented including new or redirected enforcement efforts to increase the focus towards new or enhanced actions.
- **Anti-littering and illegal dumping enforcement activities:** Describe anti-littering and illegal dumping enforcement activities began after to the MRP 1.0 effective date (i.e., December 2009) and continued in FY 2018/19, and any enhancements or new actions implemented in FY 2018/19. Include any new or redirected enforcement efforts to increase the focus towards new or enhanced actions. Describe the number of citations or other correction actions accomplished this year, and compare with previous years. Indicate how anti-littering and illegal dumping enforcement records are kept, and how they may be retrieved for audit.
- **Improved Trash Bin/Container Management:** Describe activities designed to improve trash bin/container management that began after the MRP1.0 effective date (i.e., December 2009) and continued in FY 2018/19, and any enhancements or new actions implemented in FY 2018/19. Include any new or redirected efforts to increase the focus towards these new or enhanced actions.
- **Other Types of Actions:** Describe activities designed after the MRP effective date (i.e., December 2009) and continued in FY 2018/19, and any enhancements or new (post December 2009 effective date) actions implemented in FY 2018/19.

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

Provide the following:

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

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

TMA ID or (as applicable) Control Measure Area	Total Street Miles <sup>56</sup> or Acres Available for Assessment	Summary of On-land Visual Assessments			Jurisdictional-wide Reduction (%)
		Street Miles or Acres Assessed	% of Available Street Miles or Acres Assessed	Avg. # of Assessments Conducted at Each Site	
1*	0	NA	NA	NA	NA
2*	0	NA	NA	NA	NA
<b>Total</b>		<b>0</b>	<b>-</b>	<b>-</b>	<b>NA</b>

\*All jurisdictional land areas in the Town of Hillsborough are generating very low levels of trash (i.e., green on the baseline trash generation map) and therefore the Town has achieved a 100% trash reduction level (i.e., no adverse impacts or full capture system equivalency), consistent with the NPDES Permit.

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

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

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction
Single Use Bag Ordinance	The Town is almost exclusively zoned single family residential and does not have any establishments that distribute plastic bags. However, San Mateo	On behalf of all SMCWPPP Permittees, the County of San Mateo conducted assessments evaluating the	Results of assessments conducted by the County of San Mateo on behalf of all municipalities in San Mateo	NA

<sup>56</sup> Linear feet are defined as the street length and do not include street median curbs.

**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>County's Reusable Bag Ordinance, which went into effect in 2013, has been effective in reducing trash generated from single-use plastic bags. Currently, the price of plastic and paper bags is 25 cents at most San Mateo County retailers, encouraging consumers to use fewer or no single-use bags.</p>	<p>effectiveness of the single use plastic bag ban in municipalities within San Mateo County. Assessments conducted by the County included audits of businesses and surveys of customer bag usage at many businesses in San Mateo County. Additionally, the number of complaints by customers was also tracked by the County. The results of assessments conducted by these cities are assumed to be representative of all SMCWPPP Permittees, given the consistency between the scope, implementation, and enforcement of the ordinances among the municipalities. The Town 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;          2) 95% of single use plastic</p>	<p>County indicate that ordinances are 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. Assuming single use bags are 8% of the trash observed in stormwater discharges, the Town concludes that there has been a 7% (i.e., 8% x 86% effectiveness in reducing bags) reduction in trash in stormwater discharges as a result of the county ordinance. As the Town does not have any establishments that generate Single-Use Plastic Bags, this assessment methodology reduces trash entering into the Town due to the implementation done by neighboring cities.</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.				
		bags distributed in the Town are the implementation of the ordinance, based on the County of San Mateo's Environmental Impact Report; and 3) 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.		
Expanded Polystyrene Food Service Ware Ordinance	The Town of Hillsborough passed Ordinance Number 475 adding Chapter 8.10 to the Town's Municipal Code supporting international, federal, and state bans of all uses of chlorofluorocarbons and polystyrene foam. As a result, Town sponsored events or events on Town property are prohibited from using polystyrene based disposable food service packaging.	Although the Town has adopted and implemented an ordinance prohibiting the distribution of EPS food ware by food vendors, evaluations of the effectiveness of the ordinance have not yet been conducted. For the purpose of estimating trash reductions in stormwater discharges associated with the ordinance, the results of assessments conducted by the cities of Los Altos and Palo Alto were used to represent the reduction of trash associated with the Town's ordinance. Assessments conducted by these cities were conducted prior to and	Results of assessments that are reprehensive of the Town but were conducted by the cities of Los Altos and Palo Alto, indicate that Town's ordinance is effective in reducing EPS food ware in stormwater discharges. This conclusion is based on the following assessment result – an average of 95% of businesses affected by the ordinance is no longer distributing EPS food ware post-ordinance. Based on these results, the estimated average reduction of EPS food ware in stormwater discharges is 90%. Assuming EPS food ware is 6% of the trash observed in stormwater discharges, the	NA

**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>following the effective date of their ordinances, and include audits of businesses and/or assessments of EPS food ware observed on streets, storm drains and local creeks. The results of assessments conducted by these cities are assumed to be representative of the effectiveness of the Town's ordinance because the implementation (including enforcement) of the Town's ordinance is similar to the City of Los Altos' and Palo Alto's. The Town developed its 5% trash reduced estimate using the following assumptions:</p> <ol style="list-style-type: none"> <li>1) EPS food ware comprises 6% of the trash discharged from stormwater conveyances, based on the Regional Trash Generation Study conducted by BASMAA</li> <li>2) 80% of EPS food ware distributed by food vendors or sold via stores in the County is affected by the implementation of the ordinance; and</li> <li>3) There is now 95% less EPS food ware being distributed,</li> </ol>	<p>Town discharges, the Town concludes that there has been a 5% (i.e., 6% x 90%) reduction in trash in stormwater discharges as a result of the ordinance.</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.

		<p>sold and/or observed in the environment, based on assessments conducted by the City of Palo Alto and City of Los Altos.</p>		
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**C.10.b.v ► Trash Reduction – Receiving Water Monitoring**

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

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

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

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



**C.10.c ► Trash Hot Spot Cleanups**

Provide the FY 2018/19 cleanup date and volume of trash removed during each MRP-required Trash Hot Spot cleanup during each fiscal year listed. Indicate whether the site was a new site in FY 2018/19.

Trash Hot Spot	New Site in FY 2018/19 (Y/N)	FY 2018/19 Cleanup Date(s)	Volume of Trash Removed (cubic yards)				
			FY 2014/15	FY 2015/16	FY 2016/17	FY 2017/18	FY 2018/19
HL01	N	March 15, 2019	0.15	0.15	0.15	0	3.0

**C.10.d ► Long-Term Trash Load Reduction Plan**

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), baseline trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your baseline trash generation map was revised and if so what information was collected to support the revision. If your baseline trash generation map was revised, attach it to your Annual Report.

Description of Significant Revision	Associated TMA
In FY 15-16, consistent with all MRP Permittees, all public K-12 schools, college and university parcels were made non-jurisdictional on the Town's baseline trash generation maps. Under California Government Code Sections 4450 through 4461, the construction, modification, or alternation of facilities and/or structures on these parcels are under the jurisdiction of the California Division of State Architect and not the Town. The public right-of-way (e.g., streets and sidewalks) surrounding these parcels remain as jurisdictional on the Town's baseline trash generation maps. Revised maps that incorporate these revisions were included in Appendix 10-2 of the FY 15-16 Annual Report.	All applicable
In FY 14-15, the Town of Hillsborough's Baseline Trash Generation Map included 7 acres of land in TMA 1 that is entirely comprised of the roadway on Skyline Boulevard (State Highway 35) under the jurisdiction of the California Department of Transportation (Caltrans). Based on a combination of baseline on-land visual trash assessments and an evaluation of the boundaries of this jurisdictional area, these 7 acres have been designated as non-jurisdictional, and the associated baseline trash generation has been removed from the Town's baseline map and acreage. As a result, the Town is entirely "low trash generation." The Town's baseline generation map has been revised accordingly and is included in Appendix 10-2 of The FY 15-16 Annual Report.	TMA 1

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

Provide a summary description of each offset program implemented, the volume of trash removed, and the offset claimed in FY 18-19. Also, for additional creek and shoreline cleanups, describe the number and frequency of cleanups conducted, and the locations and cleanup dates. For direct discharge control programs approved by the Water Board Executive Officer, also describe the results of the assessments conducted in receiving waters to demonstrate the effectiveness of the control program. Include an Appendix that provides the calculations and data used to determine the trash reduction offset.

Offset Program	Summary Description of Actions and Assessment Results	Volume of Trash (CY) Removed/Controlled in FY 18-19	Offset (% Jurisdiction-wide Reduction)
<b>Additional Creek and Shoreline Cleanups (Max 10% Offset)</b>	NA	NA	NA
<b>Direct Trash Discharge Controls (Max 15% Offset)</b>	NA	NA	NA

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 2018/19.

TMA	2009 Baseline Trash Generation (Acres)					Trash Generation (Acres) in FY 2018/19 After Accounting for Full Capture Systems					Jurisdiction-wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 2018/19 After Accounting for Full Capture Systems and Other Control Measures					Jurisdiction-wide Reduction via Other Control Measures (%)	Jurisdiction-wide Reduction via Full Capture AND Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1*	0	0	0	0	0	0	0	0	0	0	NA	0	0	0	0	0	NA	NA
2**	3,909	0	0	0	3,909	3,909	0	0	0	3,909	NA	3,909	0	0	0	3,909	NA	NA
<b>Totals</b>	<b>3,909</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3,909</b>	<b>3,909</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3,909</b>	<b>NA</b>	<b>3,909</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>3,909</b>	<b>100%**</b>	<b>100%**</b>

\* Land area in this TMA is comprised entirely of State Highway 35 (Skyline Blvd), which is non-jurisdictional and the responsibility of the California Department of Transportation.

\*\*All jurisdictional areas are low trash generating and have achieved the "no adverse impact" goal.

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

<sup>60</sup> Due to rounding, total acres and percentages presented in this table may be slightly different than the sum of the acres/percentages in the corresponding rows/columns (e.g., differ by 1 acre or 0.1%).

Section 11 - Provision C.11 Mercury Controls

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

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

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

- Documentation of mercury control measures implemented in our agency's jurisdictional area for which load reductions will be reported and the associated management areas;
- A description of how the BASMAA Interim Accounting Methodology<sup>57</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.

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

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

**C.11.e ◻ Implement a Risk Reduction Program**

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

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<sup>57</sup>BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.1. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., March 23, 2017.

Section 12 - Provision C.12 PCBs Controls

**C.12.a ► Implement Control Measures to Achieve PCBs Load Reductions**

**C.12.b ► Assess PCBs Load Reductions from Stormwater**

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

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

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

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

<sup>58</sup>BASMAA 2017. Interim Accounting Methodology for TMDL Loads Reduced, Version 1.1. Prepared for BASMAA by Geosyntec Consultants and EOA, Inc., September 19, 2017.

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

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

Section 13 - Provision C.13 Copper Controls

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

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

Summary:

The Town provides guidance related to requirements for Architectural Copper via 1) The Town's website [www.hillsborough.net/DocumentCenter/View/1408](http://www.hillsborough.net/DocumentCenter/View/1408); 2) the SMCWPPP "Requirements for Architectural Copper" Fact Sheet [www.flowstobay.org/files/newdevelopment/flyersfactsheets/ArchitecturalcopperBMPs.pdf](http://www.flowstobay.org/files/newdevelopment/flyersfactsheets/ArchitecturalcopperBMPs.pdf) to building permit applications for roof replacement or new buildings; and 3) reviews building permit applications specifically for the use of copper architectural features, and provides guidance on the installation and maintenance of these features.

The building inspectors during the construction inspections are responsible for identifying copper architectural features and if appropriate BMPs are implemented. Any issues noted are documented and enforcement actions recorded in the Provision C.6 inspection records. The enforcement staff is responsible for responding to, investigating and identifying illegal discharge of wash water from washing copper architectural features. Any enforcement actions or reported discharges are recorded in the Provision C.5 inspection records. Inspectors are made aware of the concerns with copper architectural features at SMCWPPP Training Workshops and internal municipal trainings.

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

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

Summary:

The Town's found no enforcement activities related to copper containing discharge from pools, spas and fountains during this FY.

In FY 18-19 the Town used the OWOW "Maintenance Tips for Pools, Spas, and Fountains" Fact Sheet, available on the SMCWPPP website (<http://www.ourwaterourworld.org/Portals/0/documents/pdf/Maintenance%20Tips%20for%20Pools%20%20Spas%20and%20Fountains.pdf>) to educate the public. In FY 19-20, the Town will start using SMCWPPP new fact sheet BMPs for Swimming Pools, Hot Tubs and Fountain water discharges, available on the SMCWPPP website (<https://www.flowstobay.org/Sites/default/file20%26%20Spas%20BMP%20Brochure.pdf>).

The Town also responds to discharges from pools through Provision C.5 - Illicit discharge detection and elimination program; and requires all regulated projects to discharge pools, spas, and fountain water to the sanitary sewer. The Town enforces copper-containing discharges from pools, spas, and fountains only to the sanitary sewer system.

**C.13.c.iii ► Industrial Sources Copper Reduction Results**

Based upon inspection activities conducted under Provision C.4, highlight copper reduction results achieved among the facilities identified as potential users or sources of copper, facilities inspected, and BMPs addressed.

Summary:

Not applicable. The Town does not have any industrial facilities identified as potential users or sources of copper.

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

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

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

Promote conservation programs

Promote outreach for less toxic pest control and landscape management

Promote use of drought tolerant and native vegetation

Promote outreach messages to encourage appropriate watering/irrigation practices

Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.

Summary:

The Town of Hillsborough recognizes the importance of water conservation and continues to offer the following water conservation resources and programs:

- Water Efficient Landscape Classes: The Town partners with BAWSCA to host and advertise landscape classes that promote residential drought tolerant / native landscape design and maintenance.
- Automated Metering Infrastructure (AMI): The Town replaced its aging residential and commercial water meters with advanced meters that provide hourly measurements of water use and leak alerts when unusual water use (water leaks) is detected.
- WaterSmart Software: As a part of its AMI system, the Town provides all of its water customers access to WaterSmart, a customer service portal software tool that allows residents to log on and view their historical water use in hourly, daily, weekly, monthly and annual increments. This allows residents to gauge current water use as compared to historical, assess irrigation events by usage amounts and frequency, and set usage thresholds that send them alerts when water use increases significantly.
- Winter Irrigation Alerts: The Town uses its AMI system to provide its customers with wet weather irrigation alerts. These alerts go to customers who actively irrigate during wet weather events.
- Annual Environmental Faire: The Town hosts an annual environmental fair at which residents learn about the Town's new AMI system, WaterSmart, water conservation and best landscape management practices. Residents are provided access to free compost to improve soil health and water absorption during wet weather events.

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