Town of Moraga

TOWN MANAGER

September 15, 2012

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

Ms. Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Wolfe and Ms. Creedon:

Enclosed is the 2011 - 2012 Annual Report for the Town of Moraga, which is required by and in accordance with Provision C.16 in National Pollutant Discharge Elimination System (NPDES) Permit Number CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board and/or by Provision C.13 in NPDES Permit Number CA0083313 issued by the Central Valley Regional Water Quality Control Board.

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 assure that qualified personnel properly gathered and evaluated 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 known violations.

Very truly yours,

Jill Keimach
Town Manager

Enclosure

329 Rheem Boulevard • Moraga, CA 94556 • (925) 888-7022 • jkeimach@moraga.ca.us • www.moraga.ca.us

ATTACHMENT B

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Section 1 – Permittee Information

Background Information					
Permittee Name:	Town of Moraga				
Population:	16,016				
NPDES Permit No.:	CAS612008 (San Francisco Bay RWQCB Permit) and/or CA00883313 (Central Valley RWQCB Permit)				
Order Number:	R2-2009-0074 (San Francisco Bay RWQCB) and/or R5-2010-0102 (Central Valley RWQCB)				
Reporting Time Period (month/year):	July / 2011 through June / 2012				
Name of the Responsible Authority:	Jill Keimach			**Title:**	Town Manager
Mailing Address:	329 Rheem Boulevard				
City:	Moraga	**Zip Code:**	94556	**County:**	Contra Costa
Telephone Number:	925-888-7020		**Fax Number:**		925-376-5203
E-mail Address:	jkeimach@moraga.ca.us				
Name of the Designated Stormwater Management Program Contact (if different from above):	Edric Kwan		**Title:**	Public Works Director / Town Engineer	
Department:	Public Works / Engineering				
Mailing Address:	329 Rheem Boulevard				
City:	Moraga	**Zip Code:**	94556	**County:**	Contra Costa
Telephone Number:	925-888-7025		**Fax Number:**		925-376-5203
E-mail Address:	ekwan@moraga.ca.us				

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

The Town participates in County-wide programs including the Clean Water Program Municipal Operations Committee, Development Committee, and Management Committee.

C.2.a. ▶Street and Road Repair and Maintenance

Place an **X** in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and provide explanation in the comments section below:

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

Comments:

While no paving projects were performed this year, all contractors performing minor repair work, whether utility companies or Town-sponsored, were required to regularly sweep paving waste materials and spoils and to ensure that gutters and storm drains were protected from sediment or other pollution. The Town's inspector provided oversight to ensure compliance.

C.2.b. ▶Sidewalk/Plaza Maintenance and Pavement Washing

Place an **X** in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

X	Control of wash water from pavement washing, mobile cleaning, pressure wash operations at parking lots, garages, trash areas, gas station fueling areas, and sidewalk and plaza cleaning activities from polluting stormwater
X	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments:

The Town does not directly provide sidewalk or pavement washing, however our inspector monitors these activities throughout the Town and provides education, informational support, and/or enforcement as required.

C.2.c. ▶Bridge and Structure Maintenance and Graffiti Removal

Place an **X** in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of these BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

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

Comments:

The Town maintenance staff, which consists of four staff members, has training in capture and disposal methods for protection of storm water. The Town did not utilize contractors for bridge maintenance or graffiti removal.

C.2.d. ▶Stormwater Pump Stations

Does your municipality own stormwater pump stations:		**Yes**	**X**	**No**

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

Complete the following table for dry weather DO monitoring and inspection data for pump stations[1] (add more rows for additional pump stations). If a pump station is exempt from DO monitoring, explain why it is exempt.

Pump Station Name and Location	**First inspection Dry Weather DO Data**		**Second inspection Dry Weather DO Data**	
	Date	**mg/L**	**Date**	**mg/L**
None / not applicable	N/A	N/A	N/A	N/A

Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions:
None / not applicable

Summary:
Not applicable.

Attachments:
None / not applicable.

Complete the following table for wet weather inspection data for pump stations (add more rows for additional pump stations):

Pump Station Name and Location	**Date** (2x/year required)	**Presence of Trash** (Cubic Yards)	**Presence of Odor** (Yes or No)	**Presence of Color** (Yes or No)	**Presence of Turbidity** (Yes or No)	**Presence of Floating Hydrocarbons** (Yes or No)
None / not applicable	N/A	N/A	N/A	N/A	N/A	N/A

[1] DO monitoring is exempted where all discharge from a pump station remains in a stormwater collection system or infiltrates into a dry creek immediately downstream.

C.2.e. ▶ Rural Public Works Construction and Maintenance

Does your municipality own/maintain rural[2] roads:		**Yes**	**X**	**No**

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

Place an **X** in the boxes next to implemented BMPs to indicate that these BMPs were implemented in applicable instances. 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:

	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
	No impact to creek functions including migratory fish passage during construction of roads and culverts
	Inspection of rural roads for structural integrity and prevention of impact on water quality
	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion
	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
	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:
None / not applicable

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

C.2.f. ►Corporation Yard BMP Implementation

Place an **X** in the boxes below that apply to your corporations yard(s):

	We do not have a corporation yard
	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit
X	We have a current **Stormwater Pollution Prevention Plan (SWPPP)** for the Corporation Yard(s)

Place an **X** in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type **NA** in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:

x	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment
X	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system
N/A	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method
X	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used
X	Cover and/or berm outdoor storage areas containing waste pollutants

Comments:
The Corporation Yard for the Town is entirely paved with concrete, including drains that route all runoff into a bio-treatment basin. Vehicle and equipment washing and fueling is performed off-site.

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	**Inspection Date** (1x/year required)	**Inspection Findings/Results**	**Follow-up Actions**
331 Rheem (Corp. Yard)	7/8/11	No violations found.	None required.

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

C.3.b. ▶Green Streets Status Report

(All projects to be completed by December 1, 2014)

On an annual basis (if applicable), report on the status of any pilot green street projects within your jurisdiction. For each completed project, report the capital costs, operation and maintenance costs, legal and procedural arrangements in place to address operation and maintenance and its associated costs, and the sustainable landscape measures incorporated in the project including, if relevant, the score from the Bay-Friendly Landscape Scorecard.

Summary:

The C.3 New Development and Redevelopment section of the CCCWP's FY 11-12 Annual Report includes a description of activities conducted at the countywide and regional level.

C.3.b.v.(1) ▶Regulated Projects Reporting Table

Fill in attached table **C.3.b.v.(1)** or attach your own table including the same information.

C.3.iii(3)Low Impact Development Reporting

(For FY 11-12 Annual Report only) Report the method(s) of implementation of Provision C.3.c.i in the 2012 Annual Report. For specific tasks listed in Provision C.3.c.i. that are reported using the reporting tables required for Provision C.3.b.v, a reference to those tables is adequate.

The Moraga stormwater ordinance requires every application for a development project to be accompanied by a stormwater control plan that meets the criteria in the most recent version of the CCCWP Program Stormwater C.3 Guidebook. The Guidebook has been updated to incorporate the requirements of Provision C.3.c.i. See the New Development and Redevelopment section of the CCCWP's FY 2011-2012 Annual Report for details. Please see Table C.3.b.v. (1) for specific information on regulated projects approved during FY 11-12. Note that projects approved prior to December 1, 2011 were not required to fully implement the LID requirement in Provision C.3.c.i.

C.3.e.v. ▶Alternative or In-Lieu Compliance with Provision C.3.c.

(For FY 11-12 Annual Report only) Did your agency make any ordinance/legal authority and procedural changes to implement Provision C.3.e.?	X	**Yes.**		**No**

If yes, attach a copy of the ordinance/legal authority changes or provide a link to the document(s). Discuss any procedural changes made.

The Moraga stormwater ordinance requires every application for a development project to be accompanied by a stormwater control plan that meets the criteria in the most recent version of the CCCWP Stormwater C.3 Guidebook. The Guidebook has been updated to incorporate the requirements of Provision C.3.e. See the New Development and Redevelopment section of the CCCWP's FY 2011-2012 Annual Report for details.

(For FY 11-12 Annual Report and each Annual Report thereafter) Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?		**Yes**	X	**No**
Comments (optional): No comments.				

C.3.e.vi ► Special Projects Reporting

1. Has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		**Yes**	X	**No**
2. Has your agency granted final discretionary approval of a project identified as a Special Project in the March 15, 2012 report? If yes, include the project in both the C.3.b.v.(1) Table, and the C.3.e.vi. Table.		**Yes**	X	**No**

If you answered "Yes" to either question,

1) Complete Table C.3.e.vi below.
2) Attach narrative discussion of 100% LID Feasibility or Infeasibility for each project.

C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

(1) Fill in attached table **C.3.h.iv.(1)** or attach your own table including the same information.

(2) On an annual basis, 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:

Although the Town has required a specific maintenance agreement for all new stormwater treatment systems meeting the C.3 requirements, the Town's inspector visits all sites a minimum of once each year to ensure adequate maintenance. The Town only has a few systems installed and has found no problems with the installed systems to date.

(3) On an annual basis, 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 has limited experience with installed storm water treatment systems with the first such system installed in 2008. Thus far, all systems seem to be operating as designed and the Town has not identified any required changes in O&M procedures.

(4) During the reporting year, did your agency:				
• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?		**Yes**	X	**No**
• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls?		**Yes**	X	**No**
• Inspect at least 20 percent of the total number of installed vault-based systems?		**Yes**	X	**No**
If you answered "No" to any of the questions above, please explain: There were no newly installed treatment systems installed this year.				

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

Project Name Project No.	Project Location[9], Street Address	Name of Developer	Project Phase No.[10]	Project Type & Description[11]	Project Watershed[12]	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft^2)[13]	Total Replaced Impervious Surface Area (ft^2)[14]	Total Pre-Project Impervious Surface Area[15] (ft^2)	Total Post-Project Impervious Surface Area[16] (ft^2)
Private Projects											
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Public Projects											
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Comments: There were no new Regulated Projects during the reporting period.											

[9] Include cross streets
[10] 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".
[11] 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.
[12] State the watershed(s) in which the Regulated Project is located. Optional but recommended: Also state the downstream watershed(s).
[13] All impervious surfaces added to any area of the site that was previously existing pervious surface.
[14] All impervious surfaces added to any area of the site that was previously existing impervious surface.
[15] For redevelopment projects, state the pre-project impervious surface area.
[16] For redevelopment projects, state the post-project impervious surface area.

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

Project Name Project No.	Application Deemed Complete Date[17]	Application Final Approval Date[17]	Source Control Measures[18]	Site Design Measures[19]	Treatment Systems Approved[20]	Operation & Maintenance Responsibility Mechanism[21]	Hydraulic Sizing Criteria[22]	Alternative Compliance Measures[23/24]	Alternative Certification[25]	HM Controls[26/27]
Private Projects										
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments:
There were no new Regulated Projects during the reporting period.

[17] For private projects, state project application deemed complete date and final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.
[18] 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.
[19] 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.
[20] 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.).
[21] 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.
[22] 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).
[23] 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.
[24] 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.
[25] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[26] If HM control is not required, state why not.
[27] 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), biodetention unit(s), regional detention basin, or in-stream control).

C.3.b.v.(1) ▶Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period										
Project Name Project No.	**Approval Date[28]**	**Date Construction Scheduled to Begin**	**Source Control Measures[29]**	**Site Design Measures[30]**	**Treatment Systems Approved[31]**	**Operation & Maintenance Responsibility Mechanism[32]**	**Hydraulic Sizing Criteria[33]**	**Alternative Compliance Measures[34/35]**	**Alternative Certification[36]**	**HM Controls[37/38]**
Public Projects										
None	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Comments:
There were no new Regulated Projects during the reporting period.

[28] For public projects, enter the plans and specifications approval date.
[29] 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.
[30] 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.
[31] 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.).
[32] 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.
[33] 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).
[34] 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.
[35] 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.
[36] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[37] If HM control is not required, state why not.
[38] 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), biodetention unit(s), regional detention basin, or in-stream control).

C.3.h.iv. ▶ Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

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

Name of Facility/Site Inspected	Address of Facility/Site Inspected	Newly Installed? (YES/NO)[39]	Party Responsible[40] For Maintenance	Date of Inspection	Type of Inspection[41]	Type of Treatment/HM Control(s) Inspected[42]	Inspection Findings or Results[43]	Enforcement Action Taken[44]	Comments/Follow-up
Country Club	1600 St. Andrews Drive, Moraga, CA	Yes	Property Owner	10/7/11	Routine	Bio-retention facility	Proper O&M	None	None
SMC	1928 St. Mary's Road, Moraga, CA	Yes	College	10/4/11	Routine	Bio-retention facility	Immediate maintenance / repair needed	Verbal warning with follow-up inspection	Re-inspected 10/7/11 and were in compliance.

[39] Indicate "YES" if the facility was installed within the reporting period, or "NO" if installed during a previous fiscal year.
[40] State the responsible operator for installed stormwater treatment systems and HM controls.
[41] State the type of inspection (e.g., 45-day, routine or scheduled, follow-up, etc.).
[42] State the type(s) of treatment systems inspected (e.g., bioretention facility, flow-through planter, infiltration basin, etc...) and the type(s) of HM controls inspected, and indicate whether the treatment system is an onsite, joint, or offsite system.
[43] State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).
[44] State the enforcement action(s) taken, if any, as appropriate and consistent with your municipality's Enforcement Response Plan.

C.3.e vi.Special Projects Reporting Table

Reporting Period – December 1, 2011 – June 30, 2012

Project Name & No.	Permittee	Address	Application Submittal Date[45]	Status[46]	Description[47]	Site Total Acreage	Density DU/Acre	Density FAR	Special Project Category[48]	LID Treatment Reduction Credit Available[49]	List of LID Stormwater Treatment Systems[50]	List of Non-LID Stormwater Treatment Systems[51]
No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects	No applicable projects

[45] Date that a planning application for the Special Project was submitted. If a planning application has not been submitted, include a projected application date.
[46] 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.
[47] Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.
[48] For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.
[49] 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.
[50] 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.
[51] 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.

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

Program Highlights

Provide background information, highlights, trends, etc.

The Town worked with Central Sanitary District (our contract inspection company) to update the target locations, and inspection frequencies and priorities. Central San conducted 36 inspections including repeat visits. The Town's inspector and storm water coordinator also attended inspection training and continued participation in the County-wide committees for inspections (MOC). Refer to the C.4. Industrial and Commercial Site Controls section of the CCCWP's FY 10-11 Annual Report for a description of activities of the countywide program and/or the BASMAA Municipal Operations Committee.

C.4.b.i. ► Business Inspection Plan

Do you have a Business Inspection Plan? [X] Yes [ ] No

If No, explain:
The Town's Business Inspection Plan continues to evolve as new needs and/or requirements are identified.

C.4.b.iii.(1) ► Potential Facilities List

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

See attached City Inventory for Commercial Facility Inspection Candidates (Attachment C.4.b.iii(1)).

C.4.b.iii.(2) ►Facilities Scheduled for Inspection

List below or attach your list of facilities scheduled for inspection during the current fiscal year.

See attached City Inventory for Commercial Facility Planned Inspections (Attachment C.4.b.iii(2)).

C.4.c.iii.(1) ►Facility Inspections

Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.

X	Permittee reports multiple discrete violations on a site as one violation.
	Permittee reports the total number of discrete violations on each site.

	Number	Percent
Number of businesses inspected	19	N/A
Total number of inspections conducted	36	N/A
Number of violations (excluding verbal warnings)	4	N/A
Sites inspected in violation	3	100%
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	3	100%

Comments:
Sites where no actual discharge is observed and verbal warnings are issued are not considered to be in violation. Sites where discharge has or is taking place are given written "notices of violation" and require follow-up. All violations were resolved within 10 days or otherwise deemed resolved in a longer but still timely manner.

C.4.c.iii.(2) ►Frequency and Types/Categories of Violations Observed

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

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	2
Potential discharge and other	2

Comments:
One or more discharges at a single site are counted as a single violation. In the discharge violation above, there was only a single discharge observed at the site, but the discharge recurred and earned additional NOVs.

C.4.c.iii.(2) ►Frequency and Type of Enforcement Conducted

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

	Enforcement Action (as listed in ERP)[46]	Number of Enforcement Actions Taken	% of Enforcement Actions Taken[47]
Level 1	Verbal Warning / Warning Notice or Education	0	0%
Level 2	Written Notice of Violation	4	100%
Level 3	Administrative Citation	0	0%
Level 4	Legal Action / Referral to State	0	0%
Total		4	100%

C.4.c.iii.(3) ►Types of Violations Noted by Business Category

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

Business Category[48]	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Commercial	0	0
Food Service	1	0
Gas Station	0	0
Permitted IU	2	0
Pool	0	0
School / College	0	0
Utility	1	0
Vehicle Service	0	0

C.4.c.iii.(4) ►Non-Filers

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

No industries were identified as non-filers during scheduled inspections during this fiscal year.

[46] Agencies to list specific enforcement actions as defined in their ERPs.
[47] Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.
[48] List your Program's standard business categories.

C.4.d.iii ▶ Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Commercial/Industrial Stormwater Inspection Training Workshop (Contra Costa County)	6/7/12	• Outline available through CWP	CCCSD-6	CCCSD-75%
CWEA Pretreatment, Pollution Prevention, and Stormwater Annual Conference	2/27 -29/12	• Stormwater BMPs • Inspector training sessions • Outreach	CCCSD-2	CCCSD-25%
Pacific Northwest CWA Annual Conference	9/18-19/11	• Stormwater BMPs • Inspector training sessions • Outreach	CCCSD-1	CCCSD-13%
CWEA – NRTC	9/21-23/11	• Stormwater education and outreach • Controlling Mobile Washers • Overview of Draft General Industrial Permit • Spill Estimation Methods	CCCSD-1	CCCSD-13%
Introduction to Criminal Environmental Investigations	9/27-29/11	• Investigation • Evidence • Case Development • Witness Training	CCCSD-1	CCCSD-13%
CWEA Annual Conference	4/19-20/12	• Inspector Training • Stormwater BMPs • Outreach	CCCSD-2	CCCSD-25%
Hazardous Materials Investigator Training	6/25-29/12	• Investigation • Evidence • Case Development • Interagency Coordination	CCCSD-1	CCCSD-13%

CCCSD = Central Contra Costa Sanitary District (Moraga contracts with CCCSD for Commercial / Industrial inspections)

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

Program Highlights

Provide background information, highlights, trends, etc.

The Town of Moraga conducts annual inspections and cleaning of drain inlets. These inspections and observation of key outfall areas aid in the detection of illicit discharge. The system has proved to be successful in identification of problem areas and detection of discharges. The Town also continues to participate in the County-wide Clean Water Program MOC Committee and Development Committees in addition to the Management Committee. Maps of the known portions of the Town's MS4 are currently available to the public either over-the-counter or in hard-copy by request.

Refer to the C.5 Illicit Discharge Detection and Elimination section of countywide program's FY 11-12 Annual Report for description of activities at the countywide or regional level.

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

List below or attach your complaint and spill response phone number and spill contact list.

Contact	Description	Phone Number
#1: 1-800-NO-DUMPING	County-wide contact number	1-800-NO-DUMPING
#2: Moraga Police Department	Police Interface for Dispatch	925-284-5010

C.5.d.iii ►Evaluation of Mobile Business Program

Describe implementation of minimum standards and BMPs for mobile businesses and your enforcement strategy. This may include participation in the BASMAA Mobile Surface Cleaners regional program or local activities.

Description:

The Town of Moraga does not directly engage or hire Mobile Surface Cleaners. The Town's inspector will respond to community reports or observations to provide guidance and education to Mobile Surface Cleaners. Please refer to the C.5 Illicit Discharge Detection and Elimination section of the CCCWP's FY 11-12 Annual Report for a description of efforts by CCCWP and the BASMAA Municipal Operations Committee to address mobile businesses.

C.5.e.iii ►Evaluation of Collection System Screening Program

Provide a summary or attach a summary of your collection screening program, a summary of problems found during collection system screening and any changes to the screening program this FY.

Description:

The Town has approximately 1100 drain inlets (including approximately 50 located on private property) and 1 outfall. Our maintenance staff visits every drain inlet (located on public property) a minimum of once a year (primarily in the fall) for cleaning and inspection or as needed to respond to a complaint or request to retrieve lost items. Inlets with significant debris accumulation are scheduled for an additional visit. The Town has not observed major trash accumulation in the inlets but does clean out substantial organic debris (leaves, etc.) from the many trees along the streets. The level of debris accumulation is relatively unchanged from previous years. In FY 11-12, there were no reported illicit discharges.

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

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

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

Comments:

The Town may receive notice of a spill or discharge via the County dumping complaint line, the police department or directly to the Public Works department. When a complaint or notice is received, the Town's inspector will investigate and determine the best course of action. The volume of reports has been very small over the past year as noted in the data above (there were no reports of illicit discharges or spills in FY 11-12).

C.5.f.iii.(4) ►Summary of major types of discharges and complaints

Provide a narrative or attach a table and/or graph.

No spills or discharges were reported in FY 11-12.

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.1.a, b, c ►Site/Inspection Totals

Number of sites disturbing < 1 acre of soil requiring storm water runoff quality inspection (i.e. High Priority) (C.6.e.iii.1.a)	**Number of sites disturbing ≥ 1 acre of soil** (C.6.e.iii.1.b)	**Total number of storm water runoff quality inspections conducted** (C.6.e.iii.1.c)
0	0	0

Comments:
The Town inspected two non-high priority sites that are less than one acre, during wet weather, for a total of 19 site inspections at these two locations.

C.6.e.iii.1.d ►Construction Activities Storm Water Violations

BMP Category	**Number of Violations**[49]	**% of Total Violations**[50]
Erosion Control	0	0
Run-on and Run-off Control	0	0
Sediment Control	0	0
Active Treatment Systems	0	0
Good Site Management	0	0
Non Stormwater Management	0	0
Total	**0**	**100%**

[49] Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category.
[50] Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

C.6.e.iii.1.e ►Construction Related Storm Water Enforcement Actions

	Enforcement Action (as listed in ERP)[51]	Number Enforcement Actions Taken	% Enforcement Actions Taken[52]
Level 1	Verbal or written warning	0	0
Level 2	Notice of violation	0	0
Level 3	Administrative citation	0	0
Level 4	Legal action/referral to State	0	0
Total		**0**	**100%**

C.6.e.iii.1.f, g ►Illicit Discharges

	Number
Number of illicit discharges, actual and those inferred through evidence (C.6.e.iii.1.f)	0
Number of sites with discharges, actual and those inferred through evidence (C.6.e.iii.1.g)	0

C.6.e.iii.1.h, i ►Violation Correction Times

	Number	Percent
Violations fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	0	N/A[53]
Violations not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	0	N/A[54]
Total number of violations for the reporting year[55]	0	100%
Comments: The Town did not inspect any high priority sites or sites greater than one acre.		

[51] Agencies should list the specific enforcement actions as defined in their ERPs.
[52] Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.
[53] Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.
[54] Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.
[55] Total number of violations equals the number of initial enforcement actions (i.e. one violation issued for several problems during an inspection at a site). It does not equal the total number of enforcement actions because one violation issued at a site may have a second enforcement action for the same violation at the next inspection if it is not corrected.

C.6.e.iii.(2) ►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:

With fewer active projects than prior years, no clear trend has developed. Developers continue to need to be reminded about maintenance of erosion controls and good site management to avoid discharge off-site.

C.6.e.iii.(2) ►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 construction inspection program has successfully met the goals of the MRP in reducing or eliminating non-stormwater discharge. Although there is no established trend due to the low level of construction activity, we have been able to refine procedures and forms to ensure proper data collection. The Town continues to participate in the County-wide Clean Water program and provides feedback on the forms and procedures from a small agency's perspective by participating in the CCCWP's Development Committee. Please also refer to the C.6 Construction Site Control section of the CCCWP's FY 11-12 Annual Report for a description of activities at the countywide or regional level.

C.6.f ►Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
CESSWI Training for Inspector Certification	February 2-3, 2012	Topics covered include site safety, communication, documentation, inspector duties, and plan management.	1	50%

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

C.7.b.ii.1 ▶Advertising Campaign

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

Summary:

See the Fiscal Year 2011/12 Group Program Annual Report, Section C.7, for reporting on all public information and outreach activities conducted countywide and/or regionally.

C.7.b.iii.1 ▶Pre-Campaign Survey

(For the Annual Report following the precampaign survey) Summarize survey information such as sample size, type of survey (telephone survey, interviews etc.). Attach a survey report that includes the following information. If survey was done regionally, refer to a regional submittal that contains the following information:

Place an **X** in the appropriate box below:

	Survey report attached
X	Reference to regional submittal: See the Fiscal Year 2011/12 Group Program Annual Report, Section C.7, for a report summarizing the Pre-Campaign Trash Survey conducted by the Program on our behalf.

C.7.c ▶Media Relations

Summarize the media relations effort. Include the following details for each media pitch in the space below, AND/OR refer to a regional report that includes these details:

- Topic and content of pitch
- Medium (TV, radio, print, online)
- Date of publication/broadcast

Summary:

Given its limited resources, the Town of Moraga finds it more practical to participate in regional media efforts rather than more geographically limited ones. Therefore all of the Town's efforts for media relations efforts were through BASMAA and the CCCWP.

The following separate report developed by BASMAA summarizes media relations efforts conducted during FY 11-12:

• BASMAA Media Relations Final Report FY 11-12

This report and any other media relations efforts conducted countywide or regionally are included within the C.7 Public Information and Outreach section of CCCWP's FY 11-12 Annual Report."

C.7.d ▶Stormwater Point of Contact

Summary of any changes made during FY 11-12:
No Change.

C.7.e ▶Public Outreach 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

Event Details	**Description** (messages, audience)	**Evaluation of Effectiveness**
Provide event name, date, and location. Indicate if event is local, countywide or regional.	Identify type of event (e.g., school fair, 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: • Estimated overall attendance at the event. • Number of people that visited the booth, comparison with previous years • Number of brochures and giveaways distributed • Results of any spot surveys conducted
Community Faire in Moraga, May 12, 2012	This is information, "get-acquainted" type of event to introduce goods and services to the residents. Held at one of the two shopping centers, the attendance has grown over the past. Program materials were distributed and questions addressed.	Although attendance at the overall fair continues to grow, visits to the stormwater booth were limited. All of the program material and giveaways were handed out.
Pear Festival at Commons Park in Moraga, September 14, 2011	Public festival with informational booths, food and entertainment. Provided trash removal, Cleanwater program materials, and answered questions from residents.	This annual event is well attended by residents and visits to the stormwater information booth reflected a moderate level of interest. Over 100 giveaways with the program message were distributed.

Bringing Back the Natives Garden Tour, May 2012, Countywide	Tour to encourage landscaping using native plants, minimizing pesticide and fertilizer use, water conservation, mulching and composting, etc... for countywide residents.	See the Fiscal Year 2011/12 Group Program Annual Report, Section C.7, for further details regarding the effectiveness of this event.
Support Our Water our World (includes tabling / outreach events at stores)	See the Fiscal Year 2011/2012 Group Program Annual Report, Section C.7, for a detailed report.	
Support Community Event Outreach via bicycle with attached signage (20 events)	See the Fiscal Year 2011/2012 Group Program Annual Report, Section C.7, for a detailed report.	

C.7.f. ▶Watershed Stewardship Collaborative Efforts

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

Evaluate effectiveness by describing the following:

- Efforts undertaken
- Major accomplishments

Summary:

See the Fiscal Year 2011/12 Group Program Annual Report, Section C.7, for a detailed report on BASMAA and the Program's encouragement and support of various Watershed Stewardship Collaborative Efforts" on our behalf, which includes support of the Bay Friendly Landscape Coalition, support of the Urban Creeks Council, support and County-wide staff participation in the Contra Costa Watershed Forum and support of the California Product Stewardship Council.

C.7.g. ▶Citizen Involvement Events

List the types of events conducted (e.g., creek clean up, storm drain inlet marking, native gardening etc.). Use the following table for reporting and evaluating citizen involvement events.

Event Details	Description	Evaluation of effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional	Describe activity (e.g., creek clean-up, storm drain marking etc.)	Provide general staff feedback on the event. Provide other evaluation details such as: • Number of participants. Any change in participation from previous years. • Distance of creek or water body cleaned • Quantity of trash/recyclables collected (weight or volume). • Number of inlets marked. • Data trends
Support BASMAA Community Watershed Stewardship Grant Program.	See the Fiscal Year 2011/2012 Group Program Annual Report, Section C.7, for a detailed report.	

C.7.h. ▶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.

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.
Support "Mr. Funnelhead" school, city/county fair events and TV ads for all grade levels.	See the Fiscal Year 2011/2012 Group Program Annual Report, Section C.7, for a detailed report.		
Support O'Rorke, Inc. media relations campaign to middle	See the Fiscal Year 2011/2012 Group Program Annual Report, Section C.7, for a detailed report.		

and high school age children.	

Section 8 - Provision C.8 Water Quality Monitoring

C.8 ▶ Water Quality Monitoring

State below if information is reported in a separate regional report. Municipalities can also describe below any Water Quality Monitoring activities in which they participate directly, e.g. participation in RMP workgroups, fieldwork within their jurisdictions, etc.

Summary

The Town of Moraga is not participating in any water quality monitoring project, but supports the County-wide efforts. During FY 11-12, we contributed through the CCCWP to the BASMAA Regional Monitoring Coalition (RMC). In addition, we contributed financially to the Regional Monitoring Program for Water Quality in the San Francisco Estuary (RMP) and were represented at RMP committees and work groups. For additional information on monitoring activities conducted by the CCCWP, BASMAA RMC and the RMP, see the C.8 Water Quality Monitoring section of the CCCWP's FY 11-12 Annual Report.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.b ▶Implement IPM Policy or Ordinance

Report implementation of IPM BMPs by showing trends in quantities and types of pesticides used, and suggest reasons for increases in use of pesticides that threaten water quality, specifically organophosphates, pyrethroids, carbaryl, and fipronil. A separate report can be attached as evidence of your implementation.

Trends in Quantities and Types of Pesticides Used[56]

Pesticide Category and Specific Pesticide Used	Amount[57]				
	FY 09-10	FY 10-11	FY 11-12	FY 12-13	FY 13-14
Organophosphates	0	0	0		
Pyrethroids	0	0	0		
Carbaryl	0	0	0		
Fipronil	0	0	0		

C.9.c ▶Train Municipal Employees

Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	4
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years.	4
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within the last three years.	100%

C.9.d ▶Require Contractors to Implement IPM

Did your municipality contract with any pesticide service provider in the reporting year?		Yes	X	No

If yes, attach one of the following:

N/A	Contract specifications that require adherence to your IPM policy and standard operating procedures, OR
N/A	Copy(ies) of the contractors' IPM certification(s) or equivalent, OR
N/A	Equivalent documentation.

If **Not attached**, explain:

[56] Includes all municipal structural and landscape pesticide usage by employees and contractors.
[57] Weight or volume of the product or preferably its active ingredient, using same units for the product each year.

The Town has not recently used a pesticide applicator. The only pest control contractor used orange extract to treat for termites.

C.9.e ▶Track and Participate in Relevant Regulatory Processes

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

Summary:

During FY 11-12, we participated in regulatory processes related to pesticides through contributions to the CCCWP, BASMAA and CASQA. For additional information, see the Regional Pollutants of Concern Report submitted by BASMAA on behalf of all MRP Permittees.

C.9.f ▶Interface with County Agricultural Commissioners

Did your municipal staff observe any improper pesticide usage or evidence of improper usage (e.g., pesticides in storm drain systems, along street curbs, or in receiving waters) during this fiscal year?		**Yes**	X	**No**

If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary.

C.9.h.ii ▶ 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 the C.9 Pesticides Toxicity Control section of CCCWP's FY 11-12 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

C.9.h.vi ▶ 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); **OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary:

See the C.9 Pesticides Toxicity Control section of CCCWP's FY 11-12 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use.

Response to Water Board Staff Comments on Section 9, Provision C.9, of FY 10-11 Annual Report

The Town of Moraga did not receive a comment letter.

Section 10 - Provision C.10 Trash Load Reduction

C.10.a.i ►Short-Term Trash Loading Reduction Plan

(For FY 10-11 Annual Report only) Provide description of actions/tasks initiated/conducted/completed in developing a Short-Term Trash Loading Reduction Plan (due February 1, 2012).

Description:

Our Short Term Trash Loading Reduction Plan was submitted to the Water Board on February 1, 2012. See the C.10 Trash Load Reduction section of CCCWP's FY 11-12 Annual Report for information on countywide and regional activities conducted on behalf of co-permittees.

C.10.a.ii ►Baseline Trash Load and Trash Load Reduction Tracking Method

(For FY 10-11 Annual Report only) Provide description of actions/tasks initiated/conducted/completed to gather trash loading data and in developing a Baseline Trash Load and Trash Load Reduction Tracking Method (due February 1, 2012).

Description:

The Baseline Trash Load and Trash Load Reduction Tracking Method was submitted to the Water Board on February 1, 2012. See the C.10 Trash Load Reduction section of CCCWP's FY 11-12 Annual Report for information on countywide and regional activities conducted on behalf of co-permittees.

C.10.a.iii ►Minimum Full Trash Capture

(For FY 10-11 Annual Report and Each Annual Report Thereafter) Provide description of actions/tasks initiated/conducted/completed in implementing Minimum Full Trash Capture Devices (due July 1, 2014) within individual jurisdictions. Include information on Full Trash Capture Devices installed under the Bay-area Wide Trash Capture Demonstration Project administered by San Francisco Estuary Partnership and an estimate of the total land area that is planned for treatment by July 1, 2014.

Description:

See the C.10 Trash Load Reduction section of the CCCWP's FY 11-12 Annual Report for information on countywide and regional activities conducted on behalf of co-permittees. Additionally, the Town has signed an agreement to install 31 trash capture devices by the end of September, 2012.

C.10.b.iii ►Trash Hot Spot Assessment

(For FY 10-11 Annual Report and Each Annual Report Thereafter) Provide volume of material removed from each Trash Hot Spot cleanup, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources to the extent possible.

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

Trash Hot Spot	Cleanup Date	Volume of Material Removed	Dominant Type of Trash	Trash Sources (where possible)
Moraga Creek	12/20/11	40 gallons	Bottles (plastic or glass), paper and cardboard, other plastic products, and golf or tennis balls.	Unknown

C.10.d ►Summary of Trash Reduction Actions and Loads Reduced

Provide a summary of trash load reduction actions (i.e., control measures and best management practices) implemented within your jurisdictional boundaries during the reporting period to achieve a 40% trash load reduction goal by July 1, 2014. For those actions implemented in FY 2011-12, include brief descriptions of levels of implementation and the total trash loads and dominant types of trash removed from each action.

Trash Load Reduction Action	Summary Description of Action Implemented in FY 11-12	Estimated Trash Load Removed in FY 11-12 (Gallons)[58]	Estimated Percent Reduction as of FY 11-12 [58]	Estimated Dominant Types of Trash Removed in FY 11-12
Existing Enhanced Street Sweeping				
Single-Use Carryout Bag Policies				
Polystyrene Foam Food Service Ware Policies				
Public Education and Outreach Programs				
Activities to Reduce Trash from Uncovered Loads				
Anti-littering and Illegal Dumping Enforcement Activities				
Improved Trash Bins/Container Management				

[58] The estimated load removed and percent reduction in FY 11-12 is consistent with assumptions described in the Trash Load Reduction Tracking Method Technical Report (version 1.0) submitted to the Water Board on February 1, 2012. In the future, load reductions reported in Annual Reports may be adjusted based on revisions to the tracking methodology.

C.10.d ▶Summary of Trash Reduction Actions and Loads Reduced

Provide a summary of trash load reduction actions (i.e., control measures and best management practices) implemented within your jurisdictional boundaries during the reporting period to achieve a 40% trash load reduction goal by July 1, 2014. For those actions implemented in FY 2011-12, include brief descriptions of levels of implementation and the total trash loads and dominant types of trash removed from each action.

Trash Load Reduction Action	Summary Description of Action Implemented in FY 11-12	Estimated Trash Load Removed in FY 11-12 (Gallons)[58]	Estimated Percent Reduction as of FY 11-12 [58]	Estimated Dominant Types of Trash Removed in FY 11-12
Single-use Food and Beverage Ware Ordinance				
On-land Trash Cleanups				
Additional Enhanced Street Sweeping (Beyond Existing Enhanced)				
Partial-Capture Treatment Devices				
Enhanced Storm Drain Inlet Maintenance				
Full-Capture Treatment Devices				
Creek/Channel/Shoreline Cleanups				
Total Estimated Trash Load Removed (Gallons) in FY 2011-12				
Baseline Trash Load Estimate (Gallons)				
Total Percentage Reduction in FY 2011-12 (Compared to Baseline Trash Load)				

10 Information

C.10.d ▶Summary of Trash Reduction Actions and Loads Reduced (Addendum)

Provide a summary of trash load reduction actions (i.e., control measures and best management practices) implemented within your jurisdictional boundaries during the reporting period to achieve a 40% trash load reduction goal by July 1, 2014. For those actions implemented in FY 2011-12, include brief descriptions of levels of implementation and the total trash loads and dominant types of trash removed from each action.

New or Enhanced Trash Load Reduction Action	Description of New or Enhanced Action Implemented in FY 11-12	Estimated Trash Load Removed in FY 11-12 (Gallons)[59]	Estimated Percent Reduction as of FY 11-12[58]	Estimated Dominant Types of Trash Removed in FY 11-12
Public Education and Outreach Programs	**The Town of Moraga participates in a number of outreach events. The Town supports the BASMAA effort. The Town also does outreach at the Community Faire, the Pear Festival and partners with the City of Lafayette at the Lafayette Art and Wine Festival**	**386**	**8%**	**All types of trash**
Activities to Reduce Trash from Uncovered Loads	**The Town of Moraga actively enforces the vehicle code relating to uncovered load provisions**	**193**	**4%**	**All types of trash**
On-land Trash Cleanups	**The Town of Moraga has a roadside cleanup program implemented by Town staff with jail trustees providing the labor. Ten events were conducted in FY 2011-12**	**2,130**	**44.2%**	**Plastic bags wrappers and cigarette butts**
Enhanced Storm Drain Inlet Maintenance	**The Town has committed to increasing the inlet cleaning in the retail commercial area to 3 x per year. This program has not yet commenced and currently is a once per year.**	**0**	**0**	**N/A**
Full-Capture Treatment Devices	**The Town has joined in the ABAG demonstration project. The Town has contracted to install 28 devices during FY 2012-13**	**0**	**0**	**N/A**
Creek/Channel/Shoreline Cleanups	**The Town conducted its annual Hot Spot cleanup in December**	**40**	**0.8%**	**Paper, wrappers, bottles, broken glass, and cigarette butts**

[59]The estimated load removed and percent reduction in FY 11-12 is consistent with assumptions described in the Trash Load Reduction Tracking Method Technical Report (version 1.0) submitted to the Water Board on February 1, 2012. In the future, load reductions reported in Annual Reports may be adjusted based on revisions to the tracking methodology.

10 Information

C.10.d ▶Summary of Trash Reduction Actions and Loads Reduced (Addendum)

Provide a summary of trash load reduction actions (i.e., control measures and best management practices) implemented within your jurisdictional boundaries during the reporting period to achieve a 40% trash load reduction goal by July 1, 2014. For those actions implemented in FY 2011-12, include brief descriptions of levels of implementation and the total trash loads and dominant types of trash removed from each action.

New or Enhanced Trash Load Reduction Action	Description of New or Enhanced Action Implemented in FY 11-12	Estimated Trash Load Removed in FY 11-12 (Gallons)[59]	Estimated Percent Reduction as of FY 11-12[58]	Estimated Dominant Types of Trash Removed in FY 11-12
Preliminary Estimate of Trash Load Removed (Gallons) in FY 2011-12		**2,748**		
Preliminary Baseline Trash Load Estimate (Gallons)		**4,820**		
Total Percentage Reduction in FY 2011-12 (Compared to Baseline Trash Load)		**57.0%**		

Section 11 - Provision C.11 Mercury Controls

C.11.a.i ►Mercury Recycling Efforts
List below or attach lists of efforts to promote, facilitate, and/or participate in collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs).
Refer to FY 11-12 CCCWP Annual Report for a list of mercury collection and recycling efforts conducted county-wide and regionally.

C.11.a.ii ►Mercury Collection
Provide an estimate of the mass of mercury collected through these efforts, or provide a reference to a report containing this estimate.
Please refer to the FY 11-12 Countywide Program Annual Report for an estimate of the mass of mercury collected through collection and recycling efforts in the Countywide Program area.

C.11.b ►Monitor Methylmercury C.11.c ►Pilot Projects to Investigate and Abate Mercury Sources in Drainages C.11.d ►Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices C.11.e ►Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit C.11.f ►Diversion of Dry Weather and First Flush Flows to POTWs C.11.g ►Monitor Stormwater Mercury Pollutant Loads and Loads Reduced C.11.h ►Fate and Transport Study of Mercury in Urban Runoff C.11.i ►Development of a Risk Reduction Program Implemented Throughout the Region C.11.j ►Develop Allocation Sharing Scheme with Caltrans
State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.
Summary A summary of countywide and regional accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of CCCWP's FY 11-12 Annual Report and/or the BASMAA Regional POC Report.

Section 12 - Provision C.12 PCBs Controls

C.12.a.ii,iii ►Ongoing Training

(For FY 10-11 Annual Report and Each Annual Report Thereafter) List below or attach description of ongoing training development and inspections for PCB identification, including documentation and referral to appropriate regulatory agencies (e.g. county health departments, Department of Toxic Substances Control, California Department of Public Health, and the Water Board) as necessary.

Description:

See the FY 11-12 CCCWP Annual Report for a description of training provided countywide and/or regionally, and report on any local training efforts, if applicable.

C.12.b ►Conduct Pilot Projects to Evaluate Managing PCB-Containing Materials and Wastes during Building Demolition and Renovation Activities
C.12.c ►Pilot Projects to Investigate and Abate On-land Locations with Elevated PCB Concentrations .
C.12.d ►Conduct Pilot Projects to Evaluate and Enhance Municipal Sediment Removal and Management Practices
C.12.e ►Conduct Pilot Projects to Evaluate On-Site Stormwater Treatment via Retrofit
C.12.f ►Diversion of Dry Weather and First Flush Flows to POTWs
C.12.g ►Monitor Stormwater PCB Pollutant Loads and Loads Reduced
C.12.h ►Fate and Transport Study of PCBs In Urban Runoff
C.12.i ►Development of a Risk Reduction Program Implemented Throughout the Region

State below if information is reported in a separate regional report. Municipalities that participate directly in regional activities to can provide descriptions below.

Summary

A summary of countywide and regional accomplishments for these sub-provisions are included within the C.12 PCB Controls section of CCCWP's FY 11-12 Annual Report and/or the BASMAA Regional POC Report.

Section 13 - Provision C.13 Copper Controls

C.13.a. iii.(1) ► Legal Authority: Architectural Copper

(For FY 10-11 Annual Report only) Do you have adequate legal authority to prohibit discharge of wastewater to storm drains generated from the installation, cleaning, treating, and washing of the surface of copper architectural features, including copper roofs to storm drains?	X	Yes		No

If **No**, explain and provide schedule for obtaining authority within 1 year.
Not applicable.

C.13.a.iii.(2) ►Training, Permitting and Enforcement Activities

***(FY 11-12 Annual Report and each Annual Report thereafter)* Provide summaries of activities implemented to manage waste generated from** cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction including. :

- Development of BMPs on how to manage the water during and post construction
- Requiring the use of appropriate BMPs when issuing building permits
- Educating installers and operators on appropriate BMPs
- Enforcement actions taken again noncompliance

The Town contracts out its duties relating to the Building Department to the County of Contra Costa. The Town does, however, have an ordinance (Moraga Municipal Code Chapter 13.04) relating to Storm Water Management and Discharge Control.

The County's Stormwater Management and Discharge Control Ordinance (§1014) provides sufficient authority to prohibit the discharge of any type of pollutant to the County's storm drain system, including wastewater generated from installation, cleaning, treating, and washing of the surface of copper architectural features. Any illicit discharge related to architectural copper would be enforced in accordance with the County's Enforcement response Plan. The Stormwater Management and Discharge Control Ordinance also requires regulated projects to implement a Stormwater Control Plan in accordance with the most recent iteration of the Stormwater C.3 Guidebook, which includes among the Source Control Measures that must be implemented avoidance of copper architectural features.

The County's Building Code (Title 7) incorporates the 2010 California Green Building Standards Code (California Code of Regulations, Title 24, Part 11). The Debris Recovery Ordinance (§418-14) ensures that wastes related to any use of architectural copper are recycled or disposed of at an appropriate facility.

The County distributes outreach materials related to architectural copper that discourage its use and recommend BMPs to minimize water pollution related to maintenance of existing architectural copper features.

C.13.b. iii. ▶ Legal Authority: Pools, Spas, and Fountains

(For FY10-11 Annual Report only) Do you have adequate legal authority to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals?		**Yes**		**No**
If **No**, explain and provide schedule for obtaining authority within 1 year:				

C.13.c ▶Vehicle Brake Pads

Reported in a separate regional report.

A summary of the CCCWP's participation with the Brake Pad Partnership (BPP) is included within the C.13 Copper Controls section of CCCWP's FY 11-12 Annual Report and/or the BASMAA Regional POC Report.

C.13.d.iii ▶Industrial Sources Copper Reduction Results

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

Summary

The Town of Moraga has very limited commercial/retail and no industrial facilities that would be identified as users or sources of copper. Therefore, no facilities were scheduled for inspection based on this type of activity.

C.13.e ▶Studies to Reduce Copper Pollutant Impact Uncertainties

Report on progress of studies being conducted countywide or regionally to reduce copper pollutant impact uncertainties. State below if information is reported in a separate regional report.

Summary

A summary of the countywide and/or regional efforts to develop regional studies to reduce copper pollutant impact uncertainties is included within the C.13 Copper Controls section of the CCCWP's FY 11-12 Annual Report and/or BASMAA Regional POC Report.

Section 14 - Provision C.14 PBDE, Legacy Pesticides and Selenium Controls

C.14.a ▶Control Programs for PBDEs, Legacy Pesticides and Selenium Controls

Report on progress of studies being conducted countywide or regionally to characterize the distribution and pathways of PBDEs, legacy pesticides, and selenium. State below if information is reported in a separate regional report.

Summary

A summary of countywide and regional efforts related to the Control Program for PBDEs, Legacy Pesticides and Selenium is included within the C.14 PBDE, Legacy Pesticides and Selenium section of the CCCWP's FY 11-12 Annual Report and/or BASMAA Regional POC Report.

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

C.15.b.iii.(1), C.15.b.iii.(2) ► Planned and Unplanned Discharges of Potable Water

Is your agency a water purveyor?		Yes	X	No
If **No**, skip to C.15.b.vi.(2):				
If **Yes**, Complete the attached reporting tables or attach your own table with the same information. Provide any clarifying comments below.				
Comments: Not applicable.				

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 supports use of less toxic pest control measures and models its own IPM policy for other agencies. The Town supports use of native and drought tolerant vegetation through the "Bringing Back the Natives" effort and in all new development approval processes as described in C.3.a above. The Town also actively responds to all complaints of illicit discharges. Refer to the C.3 New Development and Redevelopment, C.7. Public Information and Outreach and C.9. Pesticide Toxicity Control sections of the CCCWP's FY 11-12 Annual Report for additional information on BMPs promoted countywide.

C.15.b.iii.(1) ►Planned Discharges of the Potable Water System

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity[60] (NTU)	Implemented BMPs & Corrective Actions
Not applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

C.15.b.iii.(2) ►Unplanned Discharges of the Potable Water System[61]

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Discharge Duration (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)[62]	pH (standard units) [52]	Discharge Turbidity (Visual) [52],	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time[63]	Inspector arrival time	Responding crew arrival time
Not applicable	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

[60] Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.
[61] This table contains all of the unplanned discharges that occurred in this FY.
[62] Monitoring data is only required for 10% of the unplanned discharges. If you monitored more than 10% of your unplanned discharges, report all of the data collected.
[63], Notification to Water Board staff is required for unplanned discharges where the chlorine residual is >0.05 mg/L and total volume is ≥ 50,000 gallons. Notification to State Office of Emergency Services is required after becoming aware of aquatic impacts as a result of unplanned discharge or when the discharge might endanger or compromise public health and safety.

Attachment C.3.e.v

BEFORE THE TOWN COUNCIL OF THE TOWN OF MORAGA

In the matter of:

Amending by deletion and replacement, Chapter 13.04 of the Town of Moraga Municipal Code regarding Storm Water Management	)))	**ORDINANCE NO. 204**

THE TOWN COUNCIL OF THE TOWN OF MORAGA DOES HEREBY ORDAIN:

SECTION 1. Title 13, Chapter 13.04, entitled "Storm Water Management" of the Town of Moraga Municipal Code is hereby repealed.

SECTION 2. Title 13, Chapter 13.04, entitled "Stormwater Management and Discharge Control" is hereby added to Title 13 (Public Services) of the Town of Moraga Municipal Code to read as follows:

Chapter 13.04
STORMWATER MANAGEMENT AND DISCHARGE CONTROL

Sections:

13.04.010 Intent and Purpose.
13.04.020 Definitions.
13.04.030 Responsibility for Administration.
13.04.040 Construction and Application.
13.04.050 Stormwater Control Plan Required.
13.04.060 Prohibited Discharges.
13.04.070 Discharge in Violation of NPDES Permit.
13.04.080 Unlawful Discharge and Unlawful Connections.
13.04.090 Best Management Practices and Standards.
13.04.100 Compliance Certificates for Stormwater Management Facilities.
13.04.110 Authority to Inspect.
13.04.120 Violations Constituting Misdemeanors.
13.04.130 Penalty for Violation.
13.04.140 Continuing Violation.
13.04.150 Concealment.
13.40.160 Acts Potentially Resulting in Violation of the Federal Clean Water Act or Porter-Cologne Act.
13.40.170 Violations Deemed a Nuisance.
13.04.180 Civil Actions.
13.04.190 Remedies Not Exclusive.
13.04.200 Notice of Violation.
13.04.210 Judicial Review.

13.04.010 Intent and Purpose.

(a) The intent of this chapter is to protect and enhance the water quality in the Town of Moraga's watercourses pursuant to, and consistent with the Porter-Cologne Water Quality Control Act (Water Code section 13000 et seq.) and the Federal Clean Water Act (33 U.S.C. section 1251 et seq.).

(b) This chapter also carries out the conditions in the Town's National Pollutant Discharge Elimination System (NPDES) permit that require effective February 15, 2005 implementation of appropriate source control and site design measures and stormwater treatment measures for projects that create or replace one acre or more of impervious surface, and that effective August 15, 2006 reduce the threshold to projects that create or replace 10,000 square feet or more of impervious surface.

(c) It is the purpose of the Town Council in enacting this chapter to protect the health, safety and general welfare of the Town of Moraga's citizens by:

(1) minimizing non-stormwater discharges, whose pollutants would otherwise degrade the water quality of local streams, to the stormwater system.

(2) minimizing increases in nonpoint source pollution caused by stormwater runoff from development that would otherwise degrade local water quality.

(3) controlling the discharge to the Town's stormwater system from spills, dumping or disposal of materials other than stormwater.

(4) reducing stormwater run-off rates and volumes and nonpoint source pollution whenever possible, through stormwater management controls and ensuring that these management controls are properly maintained and pose no threat to public safety.

13.04.020 Definitions.

The following words and phrases when used in this chapter shall be as defined herein. Words and phrases in this chapter and not otherwise defined shall be interpreted as defined in the regulations issued by the U.S. Environmental Protection Agency to implement the provisions of the Federal Clean Water Act, and as defined by the State Water Resources Control Board to implement the Porter-Cologne Act:

(a) ***Best management practices or "BMP"*** are structural devices, measures, stormwater management facilities or activities that help to meet development runoff requirements at the premises. BMP also include schedules of activities, prohibitions or practices, general good housekeeping, pollution prevention practices, maintenance procedures and other management practices, to prevent or reduce the discharge of pollutants directly or indirectly to watercourses, water bodies, and wetlands.

(b) ***Town's NPDES permit*** shall mean the NPDES permit issued to the Town of Moraga, Permit No. CAS0029912, and any subsequent amendment, reissuance or successor to this NPDES permit.

(c) ***Development runoff requirements*** shall mean the provisions in the Town's NPDES permit that contain performance standards to address both the construction and post-construction phase impacts of new projects and redeveloped projects on stormwater quality. In the Town's 1999 NPDES permit these requirements are in section C. 3.

(d) ***Enforcement officer or Officer*** shall mean those individuals designated by the Town Manager to act as authorized enforcement officers.

(e) ***Guidebook*** shall mean the most recent version of the Contra Costa Clean Water Program Stormwater C. 3. Guidebook.

(f) ***Non-stormwater discharge*** is any addition of any pollutant to the Town's stormwater system, except discharges pursuant to a NPDES permit, or discharges further exempted in Section 13.04.060(c) and (d) of this chapter.

(g) ***Pollutant*** shall mean any material other than stormwater including, but not limited to, petroleum products or by-products, solid waste, incinerator residue, sewage, sewage sludge, heat, chemical waste, biological materials, radioactive materials, wrecked or discarded equipment, rock, sand, soil and industrial, municipal or agricultural waste discharged into the water or stormwater system.

(h) ***Premises*** shall mean any building, structure, facility, or installation, (including a building's grounds or other appurtenances), and adjacent sidewalks and parking strips.

(i) ***Responsible person*** shall mean the owner or occupant of any premises or who engages in any activity from which there is or may be a non-stormwater discharge or any person who releases pollutants to the Town's stormwater system.

(j) ***Stormwater*** shall mean flow on the surface of the ground resulting from precipitation.

(k) ***Stormwater management facility*** shall mean any device designated to detain, retain, filter, or infiltrate stormwater.

(l) ***Stormwater control plan*** shall mean a plan that meets those criteria contained in the most recent version of the Contra Costa Clean Water Program Stormwater C. 3. Guidebook.

(m) ***Stormwater system*** is that system of facilities by which stormwater may be conveyed to any stream, watercourse, other body of water or wetlands, including flood

control channels, any roads with drainage systems, Town streets, catch basins, curbs, gutters, ditches, improved channels, storm drains or storm drain system, which are not part of a Publicly Owned Treatment Works ("POTW") as that term is defined in 40 CFR section 122.2.

(n) ***Town Engineer*** shall mean the Town Engineer of the Town of Moraga or his or her designee.

13.04. 030 Responsibility for Administration.

The Town Manager or his designee shall administer this chapter for the Town.

13.04.040 Construction and Application.

This chapter shall be construed consistent with the requirements of the Federal Clean Water Act and amendments thereto or applicable implementing regulations and the Town's NPDES permit.

13.04.050 Stormwater Control Plan Required.

(a) Every application for a development project, including but not limited to a rezoning, tentative map, parcel map, conditional use permit, variance, site development permit, design review, or building permit that is subject to the development runoff requirements in the Town's NPDES permit shall be accompanied by a stormwater control plan that meets the criteria in the most recent version of the Contra Costa Clean Water Program Stormwater C. 3. Guidebook.

Effective February 15, 2005 this requirement shall apply to:

(A) all developments that create one acre (43,560 square feet) or more of impervious surface. Excluded from this category is the construction of one single family home, which is not part of a larger plan of development, with appropriate pollutant source control and site design measures, and using landscaping to appropriately treat runoff from roof and house-associated impervious surfaces.

(B) streets and road projects that create one acre (43,560 square feet) or more of new impervious surface. Excluded from this category are sidewalks, bicycle lanes, trails, bridge accessories, guardrails, and landscape features.

(C) projects on previously developed sites that result in the addition or replacement of a combined total of one acre (43,560 square feet) or more of impervious surface. Excluded from this category are interior remodels and routine maintenance or repair. Excluded routine maintenance and repair includes roof or exterior surface replacement, pavement resurfacing, repaving and road pavement structural section rehabilitation within the existing footprint, and any other reconstruction work within a public street or road right-of-way where both sides of that right-of-way are developed.

Effective August 15, 2006 this requirement shall apply to:

(A) all developments that create 10,000 square feet or more of impervious surface. Excluded from this category is the construction of one single family home, which is not part of a larger plan of development, with appropriate pollutant source control and site design measures, and using landscaping to appropriately treat runoff from roof and house-associated impervious surfaces.

(B) streets and road projects that create 10,000 square feet or more of new impervious surface. Excluded from this category are sidewalks, bicycle lanes, trails, bridge accessories, guardrails, and landscape features.

(C) projects on previously developed sites that result in the addition or replacement of a combined total of 10,000 square feet or more of impervious surface. Excluded from this category are interior remodels and routine maintenance or repair. Excluded routine maintenance and repair includes roof or exterior surface replacement, pavement resurfacing, repaving and road pavement structural section rehabilitation within the existing footprint, and any other reconstruction work within a public street or road right-of-way where both sides of that right-of-way are developed.

(a) Subsections (a)(1) and (a)(2) shall be interpreted in a manner that is consistent with the development runoff requirements and exclusions in the Town's NPDES permit.

(b) Implementation of an approved stormwater control plan and submittal of an approved stormwater control operation and maintenance plan by the applicant shall be a condition precedent to the issuance of a certificate of occupancy for a project subject to this section.

(c) All stormwater management facilities shall be designed in a manner to minimize the need for maintenance and reduce the chances of failure. Design guidelines are outlined in the guidebook.

(d) All stormwater management facilities shall be maintained according to the guidebook and the approved stormwater control operation and maintenance plan. The person(s) or organization(s) responsible for maintenance shall be designated in the plan. Unless a different time period is provided for in the plan, those responsible for maintenance shall inspect the stormwater management facility at least annually. The plan shall also describe how the maintenance costs will be funded. Upon the failure of a responsible person to maintain a stormwater management facility in accordance with this chapter or the plan, the Town may perform the maintenance and recover its costs from the responsible person as provided in sections 13.04.170 and 13.04.180.

(e) For access to stormwater management facilities for inspections and maintenance, recorded covenants or easements shall be provided by the property owner for access by the Town, the Contra Costa Mosquito and Vector Control District, and the Regional Water Quality Control Board.

13.04.060. Prohibited Discharges.

(a) The release of non-stormwater discharges to the Town stormwater system is prohibited.

(b) The discharge of stormwater from premises or an activity that causes or contributes to a violation of receiving water limitations in the Town's NPDES permit is prohibited.

(c) The following discharges are exempt from the prohibition set forth in subsection (a) above:

(1) any discharge in compliance with a NPDES permit issued to the discharger.

(2) flows from riparian habitats and wetlands, diverted stream flows, springs, rising groundwater and uncontaminated groundwater infiltration.

(d) The following discharges are exempt from the prohibitions set forth in subsection (a) above if the Regional Water Quality Control Board approves the exempted category under section C. 11. of the Town's NPDES permit: uncontaminated pumped groundwater, foundation drains, water from crawl space pumps, footing drains, air conditioning condensate, irrigation water, landscape irrigation, lawn or garden watering, planned and unplanned discharges from potable water sources, water line and hydrant flushing, individual residential car washing, discharges or flows from emergency fire fighting activities, and dechlorinated swimming pool discharges.

13.04.070 Discharge in Violation of NPDES Permit.

Any discharge that would result in or contribute to a violation of the Town's NPDES permit either separately considered or when combined with other discharges, is prohibited. Liability for any such discharge shall be the responsibility of the person causing or responsible for the discharge, and such person shall defend, indemnify and hold harmless the Town in any administrative or judicial enforcement action relating to such discharge.

13.04.080 Unlawful Discharge and Unlawful Connections.

(a) It is unlawful to establish, use, maintain or continue unauthorized drainage connections to the Town's stormwater system, and to commence or continue any unauthorized discharges to the Town's stormwater system.

(b) No discharge shall cause the following conditions, create a nuisance or adversely affect beneficial uses of waters of the State:

(1) floating, suspended or deposited macroscopic matter or foam;

(2) bottom deposits or aquatic growth;

(3) alterations of temperature, sediment load, nutrient load, or dissolved oxygen, which cause significant adverse impacts to native aquatic biota;

(4) visible, floating, suspended or deposited oil or products of petroleum origin; or,

(5) substances present in concentrations or quantities which cause deleterious effects on aquatic biota, wildlife or waterfowl, or which render any of these unfit for human consumption.

13.04.090 Best Management Practices and Standards.

(a) ***Generally.*** Any person owning or operating premises that may contribute pollutants to the Town's stormwater system shall undertake all practicable best management practices to reduce the potential for pollutants entering the system. Examples of such premises include, but are not limited to, parking lots, gasoline stations, industrial facilities, and other commercial enterprises.

(b) ***Litter.*** No person shall throw, deposit, leave, keep or permit to be thrown, deposited, placed, left or maintained, any refuse, rubbish, garbage or other discarded or abandoned objects, articles or other litter in or upon any street, alley, sidewalk, business place, creek, stormwater system, fountain, pool, lake, stream, river or any other body of water, or upon any public or private parcel of land so that the same might become a pollutant, except in containers or in lawfully established waste disposal facilities.

(c) ***Sidewalks.*** The occupant or tenant, or in the absence of occupant or tenant, the owner or proprietor of any real property in front of which there is a paved sidewalk shall maintain said sidewalk free of dirt or litter to the maximum extent practicable. Sweepings from the sidewalk shall not be swept or otherwise made or allowed to go into the gutter or roadway, but shall be disposed of in receptacles maintained as required for the disposal of solid waste.

(d) ***Parking Lots, Paved Areas and Related Stormwater Systems.*** Persons owning, operating or maintaining a paved parking lot, the paved areas of a gasoline station, a paved private street or road, and related stormwater systems shall clean those premises as frequently and thoroughly as practicable in a manner that does not result in the discharge of pollutants to the Town's stormwater system.

(e) ***Construction Activities.*** All construction shall conform to the requirements of the CASQA Stormwater Best Management Practices Handbooks for Construction Activities and New Development and Redevelopment, the ABAG Manual of Standards for Erosion & Sediment Control Measures, the Town's grading and erosion control ordinance and other generally accepted engineering practices for erosion control as required by the Town Engineer when undertaking construction activities. The Town Engineer may establish controls on the rate of stormwater runoff from new developments and redevelopment as may be appropriate to minimize the discharge and transport of pollutants.

(f) ***Notification of Intent and Compliance with General Permits.*** Each discharger associated with construction activity or other discharger described in any general stormwater permit addressing discharges, as may be adopted by the United States Environmental Protection Agency, the State Water Resources Control Board, or the California Regional Water Quality Control Board, San Francisco Bay Region, shall provide the Town Engineer with the notice of intent, comply with and undertake all other activities required by any general stormwater permit applicable to such dischargers. Each discharger identified in an individual NPDES permit relating to stormwater discharges shall comply with and undertake all activities required by the permit.

(g) ***Development Runoff Requirements.*** For each new development and redevelopment project subject to the development runoff requirements, every applicant will submit a stormwater control plan and implement conditions of approval that reduce stormwater pollutant discharges through the construction, operation and maintenance of treatment measures and other appropriate source control and site design measures. Similarly, increases in runoff volume and flows shall be managed in accordance with the development runoff requirements.

(h) ***Compliance with Best Management Practices.*** Where best management practices guidelines or requirements have been adopted by any federal, state, regional, Town or county agency, for any activity, or operation of premises which may cause or contribute to non-stormwater discharges, every person undertaking such activity, operation or owning and operating such premises shall comply with such guidelines or requirements.

(i) ***Stormwater Pollution Prevention Plan.*** The Town Engineer may require any business or utility in the Town that is engaged in activities that may result in non-stormwater discharges or runoff pollutants to develop and implement a stormwater pollution prevention plan, which must include an employee training program. Business activities which may require a stormwater pollution prevention plan include maintenance, storage, manufacturing, assembly, equipment operations, vehicle loading, fueling, vehicle maintenance, food handling or processing, or cleanup procedures which is carried out partially or wholly out of doors.

(j) ***Coordination with Hazardous Material Release Response and Inventory Plans.*** Any business subject to the Hazardous Material Release Response and Inventory Plan, Division 20, chapter 6.95 of the California Health and Safety Code (commencing with section 25500), shall include, in that Plan, provision for compliance with this chapter, including the prohibitions of non-stormwater discharges and the requirement to reduce release of pollutants to the maximum extent practicable.

13.04.100 Compliance Certificates for Stormwater Management Facilities.

(a) Every person who owns, leases or operates any premises containing a stormwater management facility or facilities is required to obtain annually a valid operation and maintenance certificate of compliance certifying to the inspection of and the proper operation and maintenance of the treatment measures and other appropriate source control and site design measures. Each responsible person subject to this requirement shall request an inspection from the Town every 12 months. Upon the filing of such request, and the payment of a fee covering the cost of inspection, the Town shall inspect the property and shall either issue such certificate upon a determination by the inspector that all treatment measures and other appropriate source control and site design measures have been properly maintained and are in good condition, or shall issue a conditional certificate noting deficiencies that must be corrected within a time indicated on the certificate, or shall deny the certificate. A certificate shall be valid for one year from the date of issuance. The Town Council may by resolution establish the fee for the inspection and certificate.

(b) In lieu of a Town inspection, such person may arrange for an inspection from a private company authorized to conduct inspections by the Town. Such company shall use a Town-approved inspection form that shall be executed under penalty of perjury.

Should such inspection form establish that the treatment measures and other appropriate source control and site design measures have been properly maintained and are in good condition, the Town may issue an operation and maintenance certificate of compliance or the Town may at its cost re-inspect the property and proceed as described in subsection (a). The filing of a false inspection report shall be a misdemeanor.

13.04.110 Authority to Inspect.

(a) ***Generally.*** Routine or scheduled inspections shall be based upon as reasonable a selection process as may be deemed necessary to carry out the intent of this chapter, including, but not limited to, random sampling or sampling in areas with evidence of stormwater contamination, evidence of the discharge of non-stormwater to the stormwater system, or similar activities. Inspections may also be conducted in conjunction with routine or scheduled inspections conducted by other public agencies or special district, including but not limited to the Central Contra Costa Sanitary District, the Contra Costa County Fire Protection District, County Environmental Health Department, the Contra Costa Mosquito and Vector Control District, or the Regional Water Quality Control Board.

(b) ***Authority to Sample and Establish Sampling Devices.*** With the consent of the owner or occupant, or pursuant to a search or inspection warrant, any officer may establish on any property such devices as are necessary to conduct sampling or metering operations. During all authorized inspections, the officer may take any sample deemed necessary to aid in the pursuit of the inquiry or in the recordation of the activities on site.

(c) ***Notification of Spills.*** All persons in charge of the premises or responsible for emergency response for the premises have a responsibility to train premises' personnel and maintain notification procedures to ensure that immediate notification is provided to the Town of any suspected, confirmed or unconfirmed release of pollutants creating a risk of non-stormwater discharge into the Town stormwater system.

As soon as any person in charge of the premises or responsible for emergency response for the premises has knowledge of any suspected, confirmed or unconfirmed release of non-stormwater discharge entering the Town stormwater system, such person shall take all necessary steps to ensure the detection and containment and clean up of such release and shall notify the Town of the occurrence by telephoning the Town Engineer. This notification requirement is in addition to and not in lieu of other required notifications.

(d) ***Requirement to Test or Monitor.*** Any officer may require that any person engaged in any activity or owning or operating any premises that may cause or contribute to non-stormwater discharges, undertake such monitoring activities or analysis and furnish such reports as the officer may specify. The burden, including costs of these activities, analysis and reports shall bear a reasonable relationship to the need for the monitoring, analysis and reports and the benefits to be obtained. The recipient of such request shall undertake and provide the monitoring, analysis and reports required.

13.04.120 Violations Constituting Misdemeanors.

The violation of any provision of this chapter, or failure to comply with any of the mandatory requirements of this article shall constitute a misdemeanor, except that notwithstanding any other provisions of this article, any violation constituting a misdemeanor under this chapter may, at the discretion of the officer or Town attorney, be charged and prosecuted as an infraction.

13.04.130 Penalty for Violation.

(a) Upon conviction of a misdemeanor, a person shall be subject to payment of a fine, or imprisonment, or both, not to exceed the limits set forth in California Government Code section 36901.

(b) Upon conviction of an infraction, a person shall be subject to payment of a fine, not to exceed the limits set forth in California Government Code section 36900.

13.04.140 Continuing Violation.

Every day that any violation of this chapter shall continue shall constitute a separate offense.

13.04.150 Concealment.

Concealing, aiding or abetting a violation of any provision of this chapter shall constitute a violation of such provision.

13.40.160 Acts Potentially Resulting in Violation of the Federal Clean Water Act or Porter-Cologne Act.

Any person who violates any provision of this chapter, or the provisions of any permit issued pursuant to this chapter, or who releases a non-stormwater discharge, or who violates any cease and desist order, prohibition or effluent limitation, may also be in violation of the Federal Clean Water Act or the Porter-Cologne Act and may be subject to the enforcement provisions of those acts, including civil and criminal penalties. Any enforcement actions authorized pursuant to this chapter may also include notice to the violator of such potential liability pursuant to federal or state law.

13.40.170 Violations Deemed a.

In addition to the penalties provided herein, any condition caused or permitted to exist in violation of any of the provisions of this chapter is a threat to the public health, safety and welfare. Such condition is hereby declared and deemed to be a nuisance, which may be abated as provided in Chapter 7.16 of Title 17 (Section 7.16.010 Through 7.16.130) of this Code including the assessment of the costs of abatement which may be collected at the same time and in the same manner as ordinary municipal taxes as provided by Government Code section 38773.5, and by civil action to abate, enjoin or otherwise compel the cessation of such nuisance by the Town Attorney.

13.04.180 Civil Actions.

(a) In addition to any other remedies provided in this chapter, any violation of this chapter may be enforced by civil action brought by the Town. In any such action, the Town may seek, as appropriate, any and all of the following remedies:

(1) a temporary restraining order, preliminary injunction and permanent injunction;

(2) an action for an unlawful business practice pursuant to Business and Professions Code section 17206;

(b) In addition any person violating this chapter shall be liable for:

(1) reimbursement for the costs of any investigation, inspection or monitoring which led to the discovery of the violation;

(2) costs incurred in removing, correcting, or terminating the adverse effect(s) resulting from the violation;

(3) compensatory damages for the loss of, or destruction to, water quality, wildlife, fish or aquatic life. Costs and damages under this subsection shall be paid to the Town and shall be used exclusively for costs associated with monitoring and establishing a stormwater discharge pollution control system and implementing or enforcing the provisions of this chapter;

(4) the cost of maintenance and repair of any BMP or stormwater management facility that is not maintained in accordance with the guidebook or the stormwater control plan;

(5) the reasonable costs of preparing and bringing administrative action under this chapter.

13.04.190 Remedies Not Exclusive.

The remedies identified in this chapter are in addition to, and do not supersede or limit, any and all other remedies, administrative, civil or criminal. The remedies provided for herein shall be cumulative and not exclusive.

13.04.200 Notice of Violation.

Any person required to perform monitoring, analysis, reporting or corrective activity by any officer may be informed of such decision, in writing, by a notice of violation. Any person aggrieved by the decision of the officer, may file a written appeal of the notice of violation to the Town Engineer within 10 (ten) days following the date of the notice of violation. Upon receipt of such request, the Town Engineer shall request a report and recommendation from the officer and shall set the matter for hearing at the earliest practical date. At said hearing, the Town Engineer may hear additional evidence, and may reject, affirm or modify the officer's decision. Any decision of the Town Engineer shall be subject to review in accordance with Chapter 1.16 of the Moraga Municipal Code.

13.04.210 Judicial Review.

The provisions of Code of Civil Procedure section 1094.5 are applicable to judicial review of determinations made by the Town Engineer pursuant to this chapter.

SECTION 3. Severability.

If any provision of this Ordinance or the application thereof to any person or circumstances is held invalid, such invalidity shall not affect other provisions or applications of the Ordinance. To this end, the provisions of this Ordinance are

severable. This Town Council hereby declares that it would have adopted the Ordinance irrespective of the invalidity of any particular portion thereof.

SECTION 4. Publication.

Within fifteen (15) days after its final passage, the Town Clerk shall cause this ordinance to be published in accordance with Section 36933 of the California Government Code.

SECTION 5. Effective Date.

This ordinance becomes effective thirty (30) days after its final passage and adoption.

The foregoing Ordinance was introduced at a regular meeting of the Town Council held on December 8, 2004 and was adopted and ordered published at a regular meeting of the Town Council on January 10, 2005 by the following vote:

AYES:	Mayor Majchrzak; Vice Mayor Kamey and Councilmembers Bird; Deschambault and Metcalf
NOES:	None
ABSTAIN:	None
ABSENT:	None

Mike Majchrzak, Mayor

ATTEST:

Jeannine A. Gregory, Town Clerk

Attachment C.4.b.iii(1)

Clean Water Inspections
Fiscal Year 2011-12

Annual Report
7/1/2011-6/30/2012

Type	Facility Name	Address	STW City	Inspector	Date	Inspection Type	Billing Type	Enforcement?
Commercial	Advanced Mobile Solutions	375 RHEEM Blvd	Moraga	J. Olympia	8/30/2011	Closed	Add-on	None
Food Service	Kirin Sushi	356 PARK Street	Moraga	J. Olympia	1/18/2012	Initial	Add-on	None
Food Service	Michaels's Ristorante	1375 MORAGA Way A	Moraga	J. Olympia	8/26/2011	Reinspected	Add-on	None
Food Service	Mondello Cucina Italia	337 RHEEM Blvd	Moraga	J. Olympia	8/30/2011	Closed	Add-on	None
Food Service	Pennini's	1375 MORAGA Way D	Moraga	J. Olympia	8/26/2011	Reinspected	Add-on	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	10/4/2011	Reinspected	Call-out	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	10/13/2011	Follow-up	Targeted	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	10/26/2011	Enforcement F/	Targeted	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	10/26/2011			NOV
Food Service	Subway Sandwiches	396 PARK Street	Moraga	J. Olympia	9/6/2011	Reinspected	Add-on	None
Food Service	Terzetto Cuisine Café	1419 MORAGA Way	Moraga	J. Olympia	8/31/2011	Reinspected	Add-on	None
Food Service	The Red Chopstick	581 MORAGA Road	Moraga	J. Olympia	10/20/2011	Initial	Add-on	None
Food Service	The Red Chopstick	581 MORAGA Road	Moraga	J. Olympia	6/15/2012	Closed	Add-on	None
Gas Station	Abe's Moraga Shell	1405 MORAGA Way	Moraga	J. Olympia	3/6/2012	Closed	Add-on	None
Gas Station	Moraga Chevron/Lamorinda Auto Care	1455 MORAGA Way	Moraga	J. Olympia	10/31/2011	Reinspected	Add-on	None
Permitted IU	Acalanes Union High School District	310 MORAGA Road	Moraga	C. Henry	2/23/2012	Reinspected	Add-on	None
Permitted IU	Captain Vineyards	1969 JOSEPH Drive	Moraga	J. Olympia	3/22/2012	Reinspected	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	10/4/2011	Reinspected	Call-out	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	10/26/2011	Enforcement F/	Targeted	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	10/26/2011			NOV
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	11/4/2011	Reinspected	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/12/2012	Follow-up	Targeted	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	4/23/2012	Reinspected	Call-out	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	4/24/2012	Enforcement F/	Targeted	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	4/24/2012	Follow-up	Targeted	NOV
Pool	Moraga Ranch Swim Club	8 EL CAMINO FLORES	Moraga	J. Olympia	11/17/2011	Initial	Add-on	None
School/College	Saint Mary's College Rheem Campus	380 RHEEM Blvd	Moraga	J. Olympia	8/30/2011	Reinspected	Add-on	None
School/College	Saint Mary's College Rheem Campus	380 RHEEM Blvd	Moraga	J. Ortega	4/24/2012	Reinspected	Call-out	None
School/College	Saint Mary's College Rheem Campus	380 RHEEM Blvd	Moraga	J. Ortega	5/1/2012	Follow-up	Targeted	None
School/College	Saint Mary's College Rheem Campus	380 RHEEM Blvd	Moraga	J. Ortega	5/7/2012	Follow-up	Targeted	None
Utility	PG&E working at St. Mary's College (R	380 RHEEM Blvd	Moraga	J. Ortega	4/24/2012	Initial	Call-out	None
Utility	PG&E working at St. Mary's College (R	380 RHEEM Blvd	Moraga	J. Ortega	5/1/2012	Follow-up	Targeted	None

7/20/2012

Clean Water Inspections
Fiscal Year 2011-12

Annual Report
7/1/2011-6/30/2012

Type	Facility Name	Address	STW City	Inspector	Date	Inspection Type	Billing Type	Enforcement?
Utility	PG&E working at St. Mary's College (R	380 RHEEM Blvd	Moraga	J. Ortega	5/7/2012	Enforcement F/	Targeted	None
Utility	PG&E working at St. Mary's College (R	380 RHEEM Blvd	Moraga	J. Ortega	5/7/2012	Follow-up	Targeted	NOV
Vehicle Service	Autohaus Stuttgart	383 RHEEM Blvd	Moraga	J. Olympia	9/22/2011	Reinspected	Add-on	None
Vehicle Service	Rheem Valley Auto Center	455 CENTER Street	Moraga	J. Olympia	2/10/2012	Reinspected	Add-on	None

Total number of Initial Inspections and Reinspections: 19

Total number of Follow-up, Enforcement Follow-up, Surveillance, Consultation and Partial inspections: 11

Total number of closed or moved Inspections: 4

Total number of NOVs issued: 4

Total number of WNs issued: 0

7/20/2012

Attachment C.4.b.iii(2)

Planned Inspections for Moraga
(7/1/2012 to 6/30/2013)

Name	Address	Facility Type
Loard's Ice Cream	1480 MORAGA Road	Food Service
Moraga Band Shell Snack Bar	1425 ST MARYS Road	Food Service
New Dehli Bistro	484 CENTER Ave	Food Service
Moraga Produce	576 CENTER Street	Grocery Store
Shish Kabob Show	376 PARK Street	Food Service
Tangelo	384 PARK Street	Food Service
Moraga Beacon	425 MORAGA Road	Gas Station
Rheem Valley Cleaners	568 CENTER Street	Dry Cleaner
Home Goods	590 MORAGA Road	Retail
Ristorante Amoroma	360 PARK Street	Food Service
Lamorinda Food & Gas	1410 MORAGA Road	Vehicle Service
Moraga Country Club	1600 ST ANDREWS Drive	Golf Course

Subtotal: 12

Enforcement Reinspections

Sodexo (St. Mary's College Cafeteria)	1928 ST MARYS Road	Food Service
PG&E (St. Mary's College- Reheem Campus)	380 RHEEM Blvd	Utility

Subtotal: 2

Permitted IUs

Acalanes Union High School District	310 MORAGA Road	Permitted IU
Captain Vineyards	1969 JOSEPH Drive	Permitted IU
Parkmon Vineyards	55 LAIRD Drive	Permitted IU
St. Mary's College	1928 ST MARYS Road	Permitted IU

Subtotal: 4

Total Planned Inspections: 18

Total Annual Goal= 16