Town of Moraga

329 Rheem Boulevard
Moraga, CA 94556
(925) 888-7050
www.moraga.ca.us

September 15, 2011

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 2010 - 2011 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

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Section **Page**

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 / 2010 through June / 2011					
Name of the Responsible Authority:	Jill Keimach			**Title:**	Town Manager	
Mailing Address:	329 Rheem Blvd.					
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):	Jill A. Mercurio	**Title:**	Public Works Director/Town Engineer			
Department:	Public Works/Engineering					
Mailing Address:	2100 Donald Dr.					
City:	Moraga	**Zip Code:**	94556	**County:**	Contra Costa	
Telephone Number:	925-888-7025	**Fax Number:**		925-376-2034		
E-mail Address:	jmercurio@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 Cleanwater 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: In our 2 paving projects, the Town required the contractors to regularly sweep up 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: Although the Town does not directly provide sidewalk or pavement washing, our inspector does monitor these types of activities around Town and provides education information and/or enforcement as needed.

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.
NA	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.

Comments: The Town maintenance crew consists of 4 people who have been trained in capture and disposal methods for protection of stormwater. 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):

Pump Station Name and Location	**First inspection Dry Weather DO Data**		**Second inspection Dry Weather DO Data**	
	Date	**mg/L**	**Date**	**mg/L**

Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions:

Summary:

Attachments:

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)

[1] Pump stations that pump stormwater into stormwater collection systems or infiltrate into a dry creek immediately downstream are exempt from DO monitoring.

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:

[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
NA	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 Town moved into our current Corp. Yard in May, 2010. The entire yard is paved with concrete with drains that route all runoff into a bio-treatment basin. Fueling and vehicle and equipment washing 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)	7/2/10	No violations found,	None required.

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

C.3.a. ►New Development and Redevelopment Performance Standard Implementation Summary Report

(For FY 10-11Annual Report only) Provide a brief summary of the methods of implementation of Provisions C.3.a.i.(1)-(8).

Summary:

- The Town of Moraga implements C.3 under Chapter 14.52 of its Municipal Code.
  - The Town requires proposed projects to be reviewed by the Design Review Board for consistency with the General Plan, and may also require review and approval by the Planning Commission and/or Town Council. Approved projects must submit detailed plans for review and abide by any "conditions of approval" required by the review body and included in the formal approval . Project review includes an initial assessment of the adequacy of stormwater management measures as a part of the CEQA determination. More detailed assessment of stormwater plans occurs at the plan review stage as a part of the grading permit process.
  - The Town's Engineering Inspector and Stormwater coordinator attend annual training sessions and participate in the County wide Cleanwater program. The Engineering and Planning departments collaborate on review and approval of all projects.
  - Both the Engineering and Planning departments encourage implementation of stormwater treatment for all building projects and include Engineering review of all remodeling projects involving a change in impervious surfaces.
  - The Town's Design Guidelines strongly encourage retention of natural topography, trees and the overall natural site amenities. Specific sections include guidelines for protection of existing creeks and waterways, retention of trees and other natural vegetation, inclusion of bio-filtration, and prevention of irrigation runoff into stormdrains. The guidelines also preclude use of any copper for roofing and require use of landscaping to address potential erosion. The Guidelines include references to the "Build it Green" approach to sustainable building methods and practices. These Design Guidelines are derived from the more general statements in the Town's General Plan which supports retention of natural vegetation, minimization of hardscape, and preservation of existing trees.

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:

Refer to the C.3 New Development and Redevelopment section of the countywide program's FY 10-11 Annual Report for a description of pilot green street project activities conducted at the countywide or 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.

The Town only had one application for a re-development project to replace an existing building. Although the site is quite large (a golf course), the specific area involved was a direct replacement for the existing clubhouse without adding any impervious surface.

C.3.c. Low Impact Development Reporting

The Town participates in the County-wide Cleanwater Program which has produced soil specifications for use in bio-treatment devices and continues to provide local developers with assistance in understanding and implementing LID designs for their projects.

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 stormwater 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.

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[3], Street Address**	**Name of Developer**	**Project Phase No.[4]**	**Project Type & Description[5]**	**Project Watershed[6]**	**Total Site Area** (Acres)	**Total Area of Land Disturbed** (Acres)	**Total New Impervious Surface Area** (ft^2)	**Total Replaced Impervious Surface Area** (ft^2)	**Total Pre-Project Impervious Surface Area[7]** (ft^2)	**Total Post-Project Impervious Surface Area[8]** (ft^2)
Private Projects											
Moraga Country Clubhouse replacement	1600 St. Andrews Dr. Moraga, CA	Moraga Country Club	NA	Re-Development: replacement of clubhouse	Laguna Creek/San Leandro Reservoir	1.59	0.46	0	20,000	20,000	20,000
Public Projects											
None											
Comments: Although the official approval date for the Moraga Country Club reflects 5/2010 which would not be during the FY 10-11, the final building plans and engineering review and approval occurred in FY 10-11.											

[3] Include cross streets
[4] 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".
[5] 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.
[6] State the watershed(s) in which the Regulated Project is located. Optional but recommended: Also state the downstream watershed(s)
[7] For redevelopment projects, state the pre-project impervious surface area.
[8] 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[9]	Application Final Approval Date[9]	Source Control Measures[10]	Site Design Measures[11]	Treatment Systems Approved[12]	Operation & Maintenance Responsibility Mechanism[13]	Hydraulic Sizing Criteria[14]	Alternative Compliance Measures[15/16]	Alternative Certification[17]	HM Controls[18/19]
Private Projects										
Moraga Country Clubhouse repl.	5/04/2010	5/20/2010	Covered trash enclosures	No added Impervious surface	3-bio-treatment basins	Country Club	C.3.d.(1)(b)	NA	NA	NR per C.3.B.ii.(1)(d)

Comments:
HM controls not required since the amount of impervious surface replaced was less than 1acre and less than 50% of the total project area. This project replaces the existing clubhouse and pool area. The landscaping is not changing, nor are parking lots. Some diversion of parking lot run-off to bio-retention basins was included.

[9] For private projects, state project application deemed complete date and final discretionary approval date.
[10] 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.
[11] 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.
[12] 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.).
[13] 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.
[14] 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).
[15] 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.
[16] 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.
[17] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[18] If HM control is not required, state why not.
[19] 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.	Is Funding Committed?[20]	Date Construction Scheduled to Begin[20]	Source Control Measures[21]	Site Design Measures[22]	Treatment Systems Approved[23]	Operation & Maintenance Responsibility Mechanism[24]	Hydraulic Sizing Criteria[25]	Alternative Compliance Measures[26/27]	Alternative Certification[28]	HM Controls[29/30]
Public Projects										
None										

Comments:
No qualifying public projects were approved or undertaken during the reporting year.

[20] For public projects, enter "Yes" or "No" under "Is Funding Committed?" and enter a date under "Date Construction Scheduled to Begin".
[21] 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.
[22] 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.
[23] 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.).
[24] 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.
[25] 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).
[26] 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.
[27] 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.
[28] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[29] If HM control is not required, state why not.
[30] 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)[31]	Party Responsible[32] For Maintenance	Date of Inspection	Type of Inspection[33]	Type of Treatment/HM Control(s) Inspected[34]	Inspection Findings or Results[35]	Enforcement Action Taken[36]	Comments
Julianna Ct.	8 Julianna Ct.	No	Homeowner	3/22/11	Routine	Bio-retention facility	Proper O&M	None	
Fillipi Hall	St. Mary's College	No	College	2/07/11	Routine	Bio-treat./infiltration	Proper O&M	None	
Town Corp. Yard	331 Rheem Blvd.	Yes	Town	7/02/10	Routine	Bio-retention facility	Proper O&M	None	
Wang Res.	226 Rheem Blvd.	Yes	Builder	11/10/10	45 Day	Bio-retention facility	Immediate Maintenance/repair needed	Verbal warning with follow-up inspection	Re-inspected 11/15/10 and found improvement, re-inspected on 11/24/10 in compliance.
Kimberly	7 Kimberly	No	Homeowner	8/12/10	Routine	Bio-retention facility	Proper O&M	None	
1057 CP	1057 Camino Pablo	Yes	Builder	2/07/11	45 Day	Bio-retention facility	Proper O&M	None	
1065 CP	1065 Camino Pablo	Yes	Builder	2/07/11	45 Day	Bio-retention facility	Proper O&M	None	

[31] Indicate "YES" if the facility was installed within the reporting period, or "NO" if installed during a previous fiscal year.
[32] State the responsible operator for installed stormwater treatment systems and HM controls.
[33] State the type of inspection (e.g., 45-day, routine, follow-up, etc.).
[34] 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.
[35] State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).
[36] State the enforcement action(s) taken, if any, as appropriate and consistent with your municipality's Enforcement Response Plan.

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 33 inspections including repeat visits. The Town's inspector and stormwater coordinator also attended inspection training in February, 2011 and continued participation in the County-wide committees for inspections (MOC). Refer to the C.4. Industrial and Commercial Site Controls section of the Program'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:
Our Business Inspection Plan continues to evolve as new needs and/or requirements are identified, the most recent revision was 4/4/2011.

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.

St. Mary's College Offices and Extension Building	375 Rheem Blvd., Moraga	Commercial
Mondello Cucina Italia	337 Rheem Blvd., Moraga	Food Service
Michael's Ristorante	1375 Moraga Wy., Moraga	Food Service
Pennini's	1375 Moraga Wy., Moraga	Food Service
Cafe Terzetto	1419 Moraga Wy., Moraga	Food Service
Subway Sandwiches	396 Park Street, Moraga	Food Service
Moraga Ranch Swim Club	8 El Camino Flores, Moraga	Pool

Moraga County Club	1600 St. Andrews Dr., Moraga	Golf Course
Moraga Chevron	1455 Moraga Wy., Moraga	Gas Station
Moraga Tennis & Swim Club	1161 Larch Ave., Moraga	Pool

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

	Number	Percent
Number of businesses inspected (if known)	20	
Total number of inspections conducted	29	
Number of violations (excluding verbal warnings)	4	
Sites inspected in violation	4	
Violations[37] resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	3	

Comments: Sites where no actual discharge is observed and a 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.

One violation required repeated re-inspection and successive escalation to be resolved. St. Mary's College cafeteria is operated by a contractor under the college administration. The local staff was educated, the contractor was notified and the College administration involved in resolution.

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)	4
Potential discharge and other	0

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.

[37] 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.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)[38]	**Number of Enforcement Actions Taken**	**% of Enforcement Actions Taken[39]**
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[40]	**Number of Actual Discharge Violations**	**Number of Potential Discharge Violations**
Commercial	0	0
Food Service	0	0
Pool	0	0
Golf Course	0	0
Vehicle Service	0	0
Permitted IUs	4	0
Retail	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:

None to report.

[38] Agencies to list specific enforcement actions as defined in their ERPs.
[39] Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.
[40] 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	February 24, 2011	• Overview of Model Business Inspection Plan and Model Enforcement Response Plan. • Contra Costa Green Business Program • Sampling and Assessing NOI Facilities • Identifying Mercury, PCBs, and Copper in the Field • Stormwater Compliance and Case Studies • Sewer Overflows • Stormwater Compliance and Enforcement	TOM - 2 CCCSD-7	TOM-100% CCCSD-88%
CWP Priority Pollutant Workshop	July 22, 2010	• Priority Pollutant Identification and Control	CCCSD-7	CCCSD-88%
CWEA Pretreatment, Pollution Prevention, & Stormwater Annual Conf.	Feb. 28-March 2, 2011	• Stormwater BMPs • Inspector Training Sessions • Outreach	CCCSD-5	CCCSD-63%
Commercial/Industrial Stormwater Inspection Training Workshop	June 9, 2011	• Priority Pollutant Identification and Control • Inspector Training • Stormwater BMPs	NA	0
CWEA Annual Conference	April 13-15, 2011	• Stormwater BMPs • Outreach	CCCSD-1	CCCSD-13

TOM= Town of Moraga

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 Cleanwater 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 10-11 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	925-888-7055

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. Also, please see the County-wide Program's FY 10-11 Annual Report for a description of County-wide committees/work groups and BASMAA Municipal Operations Committee participation.

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 visits every drain inlet 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.

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	
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))	NA	NA

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 10-11).

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

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

No reported spills or discharges in FY 10-11.

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)
2	1	15
Comments: In addition to the 2 High Priority sites, the Town also inspected 2 other construction sites during the wet weather for a total of 13 additional, non-high priority site inspections.		

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

BMP Category	**Number of Violations**[41]	**% of Total Violations**[42]
Erosion Control	2	13.3%
Run-on and Run-off Control	0	0%
Sediment Control	5	33.3%
Active Treatment Systems	0	0%
Good Site Management	2	13.3%
Non Stormwater Management	6	40%
Total	**15**	**100%**

[41] Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category.
[42] 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)[43]	Number Enforcement Actions Taken	% Enforcement Actions Taken[44]
Level 1	Verbal or written warning	2	100%
Level 2	Notice of violation	0	0
Level 3	Administrative citation	0	0
Level 4	Legal action/referral to State	0	0
Total		**2**	**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)	2
Number of sites with discharges, actual and those inferred through evidence (C.6.e.iii.1.g)	1

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)	2	100%
Violations not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	0	0%
Total number of violations for the reporting year[45]	2	100%

Comments:
The two observed violations were discharges contained on-site, after verbal warning, inspection conducted 5 days later found the problem corrected.

[43] Agencies should list the specific enforcement actions as defined in their ERPs.
[44] Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.
[45] 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 while also training our inspector (noted below). The Town continues to participate in the County-wide Cleanwater program and provides feedback on the forms and procedures from a small agency's perspective. Please also refer to the County Program Annual Report for activities at the County level supporting the program.

C.6.f ►Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Training to Become a Qualified SWPPP Developer (QSD)	February 28 – March 2, 2011	• Training Overview and Regulations • Erosion Processes and Sediment Control • SWPPP Implementation • Monitoring • Reporting • Project Planning and Site Assessment • SWPPP Development and PRDs • Project Closeout	2	100%
Training to Become a Qualified SWPPP Practitioner (QSP)	February 28 – March 1, 2011	• Training Overview and Regulations • Erosion Processes and Sediment Control • SWPPP Implementation • Monitoring • Reporting	2	100%

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 2010/11 Group Program Annual Report, Section C.7, for a summary of the Trash Campaign conducted by the Program on our behalf.

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:

- Summary of how the survey was implemented.
- Analysis of the survey results.
- Discussion of the outreach strategies based on the survey results.
- Discussion of planned or future advertising campaigns to influence awareness and behavior changes regarding trash/litter and pesticides.

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

	Survey report
X	Reference to regional submittal: attached See the Fiscal Year 2010/11 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 the County-wide Cleanwater Program in association with BASMAA. In Fiscal Year 2010/11, BASMAA conducted six media pitches on behalf of all Permittees. Please reference the BASMAA Media Relations Final Report for FY 10-11. It is included within the C.7 Public Information and Outreach section of Program's FY 10-11 Annual Report."

C.7.d ►Stormwater Point of Contact

Summary of Any Changes Made during FY 10-11:

No change.

C.7.e ►Public Outreach Events

The Town of Moraga has relatively few public events where public outreach materials may usefully be distributed. The Town takes advantage of other public events sponsored or taking place nearby to reach out to the general public. Due to population, the Town is required to participate in 3 events as described below.

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 14, 2011	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 25, 2010	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 2011, 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 2010/11 Group Program Annual Report, Section C.7, for further details regarding the effectiveness of this event.
Live Nation Anti-Litter Campaign, August 2010, Concord Pavilion	The message "Litter Travels But It Can Stop with You" was broadcast using a variety of means to concert goers. A booth with outreach information and education was provided where residents were encouraged to sign-up and participate in a creek clean-up event.	See the Fiscal Year 2010/11 Group Program Annual Report, Section C.7, for further details regarding the effectiveness of this event.

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 2010/11 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
Volunteer Creek Monitoring Program, Spring 2011, Alhambra, Walnut, Kirker, Marsh, Mount Diablo, Pinole and San Pablo Creeks.	The Program's Volunteer Creek Monitoring Program involves interested citizens and creek advocates to assist with creek bio-assessment monitoring.	See the Program's Fiscal Year 2010/11 Group Program Annual Report, Section C.8, for further details.
Volunteer Creek Cleanup activity, April 17, 2011 along the Moraga Commons Park portion of Laguna Creek.	A small team of Girl Scouts with adult leaders picked up trash along the creek-bank and walk-way.	Four volunteers from the Girl Scout spent a couple of hours picking up trash. The total was less than 3 cubic feet of trash from over 2,700 feet of creek bank and trail.

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 "Kids for the Bay", 4th and 5th grade classroom education, field trips and Watershed Action projects.	See the Fiscal Year 2010/11 Group Program Annual Report, Section C.7, for a detailed report.		
Support "Mr. Funnelhead" school, city/county fair events and TV ads.	See the Fiscal Year 2010/11 Group Program Annual Report, Section C.7, for a detailed report		
Support Newspapers in Education	See the Fiscal Year 2010/11 Group Program Annual Report, Section C.7, for a detailed report		

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 directly in any water quality monitoring project, but supports the County-wide efforts.

During FY 10-11, we contributed through the countywide Program 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 Program, BASMAA RMC and the RMP, see the C.8 Water Quality Monitoring section of the Program's FY 10-11 Annual Report and/or BASMAA's Regional Monitoring Report.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a ►Adopt an Integrated Pest Management (IPM) Policy or Ordinance

(Water Board staff requested resubmittal for FY 10-11) Attach a copy of your individual IPM ordinance or policy.	X	**Attached**		**Not attached,** explain below

If **Not attached**, explain:

Describe mechanism for adopting/formalizing IPM ordinance or policy (e.g., department head approval, integration into SOPs, staff training).

The Town's IPM policy was adopted by the Town Council in 2006 with an emphasis on reducing chemical controls, monitoring the effectiveness of control strategies and limited, closely scrutinized use of pesticides. The policy continues to evolve over time with the most recent addition of a section addressing structural pest control procedures. (See attachments C.9.a & C.9.a (2))

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. The Town's IPM policy restricts usage of most pesticides. In FY 09-10 and FY 10-11 only Roundup and Sluggo was used by employees and the only contract applicator used orange extract for treatment of termites.

Trends in Quantities and Types of Pesticides Used[46]

Pesticide Category and Specific Pesticide Used	**Amount**[47]				
	FY 09-10	**FY 10-11**	**FY 11-12**	**FY 12-13**	**FY 13-14**
Organophosphates	0	0			
Product or Pesticide Type A					
Product or Pesticide Type B					
Pyrethroids	0	0			
Product or Pesticide Type X					
Product or Pesticide Type Y					
Carbaryl	0	0			
Fipronil	0	0			

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

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:

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

If Not attached, explain:
The Town has not recently used a pesticide applicator. The only pest control contractor used orange extract to treat a termite infestation.

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 10-11, we participated in regulatory processes related to pesticides through contributions to the countywide Program, 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 Program's FY 10-11 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 Program's FY 10-11 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.

Section 10 - Provision C.10 Trash Load Reduction

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

Provide description of actions/tasks initiated/conducted/completed in developing a Short-Term Trash Loading Reduction Plan (due February 1, 2012).

Description:

See the C.10 Trash Load Reduction section of Program's FY 10-11 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:

See the C.10 Trash Load Reduction section of Program's FY 10-11 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 Bay-area Wide Trash Capture Demonstration Project administered by San Francisco Estuary Partnership.

Description:

See the C.10 Trash Load Reduction section of Program's FY 10-11 Annual Report for information on countywide and regional activities conducted on behalf of co-permittees. The Town has received a grant from the SFEP to install trash capture devices and the selection process is just beginning.

C.10.b.iii ►Trash Hot Spot Assessment

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)
Conducted and reported during FY 09-10.				

C.10.d ►Summary of Trash Load Reduction Actions

Provide summary of new trash load reduction actions or increased levels of implementation of existing actions that were implemented after adoption of the MRP (control measures and best management practices) including the types of actions and levels of implementation, and the total trash loads and dominant types of trash removed from each type of action.

Suggested trash load reduction actions to track and report may include:

- Anti-litter Campaigns
- Anti-litter/Dumping Enforcement Activities
- Curbside Recycling Programs
- Education and Outreach Efforts
- Free Trash Pickup/Drop-off Days
- County HHW Program Activities
- Improved Trash Bin Management
- Inspection/Maintenance of Storm Drain Outfalls
- Litter Pickup and Control
- Removal of Homeless Encampments
- Solid Waste Recycling Efforts
- Source Controls/Bans/Prohibitions
- Storm Drain Operation and Maintenance
- Storm Drain Signage/Marking
- Street Sweeping Activities
- Trash Removal from Receptacles
- Volunteer Creek Cleanups

Type of Trash Load Reduction Action	Date of First Implementation	Level of Implementation (specify if level was increased after MRP adoption)	Total Trash Load Removed by Action	Dominant Types of Trash Removed by Action
-The Town continues regular inspection of the streets looking for and picking up trash. The Town also regularly maintains trash receptacles in several public areas known for trash (high school bus stop, shopping centers, etc.). **-Regional efforts provide curb-side recycling for all residents and businesses in Town.** **-As noted previously, the Town cleans and inspects 100% of drain inlets each year, and revisits any that indicate significant trash. All Town stormdrains are marked for "no-dumping".** **-The Town also supports Regional education and outreach efforts against littering.** **"Trash loads removed" were not tracked for all trash load reduction actions this fiscal year. Once the Trash Load Reduction Tracking Method is developed (see Provision C.10.a.ii), trash loads removed will be documented for each load reduction action. See the Program's FY10-11 Annual Report for schedule."**	On-going	Level has been maintained since the MRP was adopted.	Approximately 350 - 30 gallon trash bags of trash per year.	Not sorted.

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 10-11 Program Annual Report for a list of mercury collection and recycling efforts conducted countywide 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.

Amount collected:

Not all mercury and PCB load reduction actions were tracked using "loads removed" methods this fiscal year. In the Program's FY 09-10 Annual Report and/or the BASMAA Regional POC Report, an initial Mercury and PCB Load Reduction Tracking Method was presented (see Provision C.11.g). Based on Water Board staff comments, a revised method will be presented in the Program's FY 10-11 Annual Report and/or the BASMAA Regional POC Report. Based on this methodology, loads removed via the collection/recycling of mercury-containing products will be documented beginning in FY 11-12.

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 Program and regional accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of Program's FY 10-11 Annual Report and/or the BASMAA Regional POC Report.

Section 12 - Provision C.12 PCBs Controls

C.12.a.i,iii ►Municipal Inspectors Training

(For FY 09-10 Annual Report only) List below or attach description of results of training municipal industrial inspectors to identify, in the course of their existing inspections, PCBs or PCB-containing equipment.

Description:

In FY 09-10, inspector training materials were developed by BASMAA and provided in the FY 09-10 BASMAA Regional POC Report. A description of efforts to train municipal industrial inspectors was provided in FY 09-10 permittee and/or Program Annual Reports.

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 10-11 Program Annual Report for a description of training provided countywide and/or regionally.

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 Program and regional accomplishments for these sub-provisions are included within the C.12 PCB Controls section of Program's FY 10-11 Annual Report and/or the BASMAA Regional POC Report.

Section 13 - Provision C.13 Copper Controls

C.13.a.i and iii ► Legal Authority: Architectural Copper

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:				

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

Do you have adequate legal authority to prohibit discharges to storm drains from pools, spas, and fountains that contain copper-based chemicals?	X	**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 countywide Program's participation with the Brake Pad Partnership (BPP) is included within the C.13 Copper Controls section of Program's FY 10-11 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

Revised. Description reads "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 the countywide Program and/or regional efforts to develop regional studies to reduce copper pollutant impact uncertainties is included within the C.13 Copper Controls section of Program's FY 10-11 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

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

Summary

A summary of the countywide Program 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 Program's FY 10-11 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:				

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 Program's FY 10-11 Annual Report for more detail.

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[48] (NTU)	Implemented BMPs & Corrective Actions
Not Applicable										

[48] Monitor the receiving water for turbidity if necessary and feasible. Include data in this column if available.

C.15.b.iii.(2) ►Unplanned Discharges of the Potable Water System[49]

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)[50]	pH (standard units) [52]	Discharge Turbidity (Visual) [52],	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time[51]	Inspector arrival time	Responding crew arrival time
Not Applicable														

[49] This table contains all of the unplanned discharges that occurred in this FY.
[50] 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.
[51]. 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.

Clean Water Inspections
Fiscal Year 2010-11

Annual Report
7/1/2010-6/30/2011

Type	Facility Name	Address	STW City	Inspector	Date	Inspection Type	Billing Type	Enforcement?
Assisted Living	Rheem Valley Convalescent Hospital	348 RHEEM Blvd	Moraga	C. Henry	8/17/2010	Reinspected	Add-on	None
Commercial	Longs Drugs	580 MORAGA Road	Moraga	C. Henry	10/21/2010	Closed	Add-on	None
Commercial	Moraga Wine & Spirits	1437 MORAGA Way	Moraga	J. Olympia	1/31/2011	Reinspected	Add-on	None
Food Service	Gourmet Bistro Café	484 CENTER Street	Moraga	C. Henry	8/24/2010	Closed	Add-on	None
Food Service	Little Hearty Noodle	578 CENTER Street	Moraga	C. Henry	8/27/2010	Initial	Add-on	None
Food Service	Mandarin Flower	581 MORAGA Road	Moraga	J. Olympia	3/29/2011	Closed	Add-on	None
Food Service	Ranch House Cafe	1012 SCHOOL Street	Moraga	J. Olympia	2/10/2011	Reinspected	Add-on	None
Food Service	Round Table Pizza	361 RHEEM Blvd	Moraga	C. Henry	7/20/2010	Enforcement F/	Targeted	None
Food Service	Round Table Pizza	361 RHEEM Blvd	Moraga	C. Henry	6/28/2011	Reinspected	Add-on	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	1/21/2011			NOV
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	1/21/2011	Reinspected	Call-out	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	1/26/2011	Enforcement F/	Targeted	None
Food Service	Sodexo (working inside St. Mary's Colle	1928 ST MARYS Road	Moraga	J. Ortega	2/6/2011	Reinspected	Call-out	None
Food Service	Starbuck's	500 MORAGA Road	Moraga	J. Olympia	3/10/2011	Reinspected	Add-on	None
Food Service	The Pasta Stop	578 CENTER Street	Moraga	C. Henry	8/24/2010	Closed	Add-on	None
Gas Station	Moraga Auto Care, Inc.	1135 MORAGA Way	Moraga	C. Henry	8/24/2010	Reinspected	Add-on	None
Laboratory	BPR Health International	1036 COUNTRY CLUB Drive	Moraga	J. Olympia	1/28/2011	Closed	Add-on	None
Permitted IU	Acalanes Union High School District	310 MORAGA Road	Moraga	C. Henry	2/3/2011	Initial	Add-on	None
Permitted IU	Captain Vineyards	1969 JOSEPH Drive	Moraga	J. Olympia	3/9/2011	Reinspected	Add-on	None
Permitted IU	Parkmon Vineyards	55 LAIRD Drive	Moraga	J. Olympia	3/15/2011	Partial	Add-on	None
Permitted IU	Parkmon Vineyards	55 LAIRD Drive	Moraga	J. Olympia	6/28/2011	Follow-up	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	10/20/2010	Reinspected	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	10/29/2010			NOV
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	11/3/2010	Enforcement F/	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	11/4/2010	Enforcement F/	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/20/2011	Enforcement F/	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/21/2011			NOV
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/21/2011	Reinspected	Add-on	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/26/2011	Enforcement F/	Targeted	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	1/26/2011			NOV
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	2/6/2011	Reinspected	Call-out	None
Permitted IU	St. Mary's College	1928 ST MARYS Road	Moraga	J. Ortega	2/6/2011	Enforcement F/	Targeted	None

Clean Water Inspections
Fiscal Year 2010-11

Annual Report
7/1/2010-6/30/2011

Type	Facility Name	Address	STW City	Inspector	Date	Inspection Type	Billing Type	Enforcement?
Residential	Residential Call-out	311 LAKEFIELD Place	Moraga	J. Olympia	1/18/2011	Initial	Call-out	None
Retail	CVS Pharmacy	1480 MORAGA Road D	Moraga	C. Henry	10/21/2010	Initial	Add-on	None
Retail	CVS Pharmacy	580 CENTER Street	Moraga	C. Henry	10/21/2010	Initial	Add-on	None
Retail	Rite Aid #6600	1441 MORAGA Road	Moraga	C. Henry	10/21/2010	Closed	Add-on	None
School/College	Saklan Valley School	1678 SCHOOL Street	Moraga	C. Henry	12/9/2010	Initial	Add-on	None
Vehicle Service	Moraga Auto Care & Service	1135 MORAGA Way	Moraga	C. Henry	8/24/2010	Initial	Add-on	None
Vehicle Service	Moraga Motors	530 MORAGA Road	Moraga	J. Olympia	1/10/2011	Reinspected	Add-on	None

Total number of Initial Inspections and Reinspections: 20

Total number of Follow-up, Enforcement Follow-up, Surveillance and Partial inspections: 9

Total number of NOVs issued: 4

Total number of WNs issued: 0

Town of Moraga
IPM Policy

Integrated Pest Management

Integrated pest management is an ecosystem-based strategy that focuses on long-term prevention of pests or their damage through a combination of techniques such as biological control, habitat manipulation, modification of cultural practices, and use of resistant varieties. Least toxic pesticides are used only after monitoring indicates they are needed according to the established guidelines in this policy.

COMPONENTS OF AN IPM, LEAST TOXIC PROGRAM:

1. Monitoring to determine pest population levels and identify decisions and practices that could affect pest populations.
2. Setting of injury and action levels to determine when vegetation or a pest population at a specific site cause(s) unacceptable economic or medical damage wherein corrective action should be taken
3. Eliminating pest habitats to deter pest populations and minimize pest infestations.
4. Utilizing pest prevention methods, such as structural modification, and/or employing progressive non-chemical methods
5. Employing as a last resort pesticides from the approved list, and, if demonstrated to be necessary, pesticides from the limited use list.
6. Evaluation of the success of the IPM program and it practices

PEST DEFINITION

For the purposes of this Policy, a "pest" is defined as an insect, weed, rodent or other animal, or fungus

PESTICIDE DEFINITION

For the purpose of this Policy, "Pesticide" means pesticide as defined in Section 12753 of Chapter 2 of Division 7 of the California Food and Agricultural Code, but does not include antimicrobial agents as defined by Section 21F.2(a) of the Administrative Code.

CONSTRUCTION/REMODELING

When designing new construction, reconstruction, or replacement of fences on Town maintained property, the IPM Coordinator and the Town Engineer will consider alternative designs for fencing, entrances, landscaping, etc. that would make implementing IPM more feasible.

DESIGNATION OF INTEGRATED PEST MANAGEMENT COORDINATION:

The Parks/Public Works Superintendent shall be the Integrated Pest Management Coordinator. The IPM coordinator will be primarily responsible for implementing the IPM policy and coordinating efforts to adopt IPM techniques. The IPM coordinator will communicate goals and guidelines to the Town Manager, staff, and personnel. The IPM coordinator will ensure that staff is trained and that pesticide use is tracked to ensure related information is available to the public.

EDUCATION AND TRAINING OF IPM COORDINATOR AND PESTICIDE APPLICATORS:

Everyone who works with or is potentially exposed to hazardous materials will receive training in Integrated Pest Management, Hazard Communication Standards and the safe use of those hazardous materials in their workplace by their administrator/supervisor or designee.

EDUCATION AND TRAINING OF STAFF, ADMINISTRATIVE PERSONNEL:

Education and training of appointed personnel is critical to the success of the IPM program. Appropriate staff will be educated on the least toxic IPM practices and procedures. Understanding of the objectives of the program will be updated periodically and reviewed. Education will include formal classroom training, on-site, and informal meetings for those employees responsible for providing pest control at least once per year. Training will be verbal and in person. No pesticides may be used at Town sites, except in accordance with the Town's printed IPM policy.

IPM APPLICATIONS AND GUIDELINES:

Only persons specifically authorized by the IPM Coordinator as Pesticide Applicators will be permitted to bring or use pesticides on Town property. Use of pesticides by pesticide applicators is limited to those products on the Approved Use or Limited Use Products List. Pesticide applicators must follow regulations and label precautions. Applicators will have training in IPM and must comply with the Town's IPM policy.

METHODS AND PRODUCT SELECTION AND PRODUCT USE APPROVAL:

It is the policy of the Town to use least-toxic IPM principles to manage pest populations. Except for pesticides granted an emergency exemption for the protection of public health, the Town will not use any products on the banned use product list. If it is determined that an EPA registered pesticide must be used, then, the least-hazardous material will be chosen.

Products will be divided into three classifications: Approved Use List, Limited Use List, and Banned Use List. If the use of a material not on either the Approved Use List or the Limited Use List is deemed necessary, the IPM Coordinator may apply for an emergency exemption.

Approved Use Products List

The IPM Coordinator shall maintain a list of all pesticides that have been approved for use by the Town Council, along with any restrictions for such use. This list shall be referred to as the Approved Use Products List.

The Approved List shall include, but not be limited to:

- Insecticides, rodenticide baits and traps
- Caulking agents and crack sealants
- Borates, silicates and diatomaceous earth
- Soap based products
- Natural products on the FIFRA's 23 (b) list (40 CFR part 152.25 (g) (1))*
- Natural products on the California Certified Organic Farmers' organic list
- EPA GRAS-generally recognized as safe products pursuant to federal EPA
- Cryogenics, electronic products, heat and light
- Biological controls such as parasites and predators
- Physical barriers
- Roundup**
- Sluggo
- Pheromones and attractants for traps

* **Explanation of FIFRA and 40 CFR** is included at the end of the policy.
** **Roundup**: Roundup may be applied on the medians, fence lines, undeveloped areas of the parks, and invasive species control in our open spaces. Any other use of Roundup will require the approval of the Town Manager.

Limited Products List

The IPM Coordinator may submit a written recommendation to the Town Manager for approval, that a particular pesticide(s) not on the Approved List be approved for use for a specific purpose. Limited use products may not be pesticides on the Banned Use Products List. The request must be reviewed by the Town Manager and signed by the IPM Coordinator. The Town Manager may grant a limited use exemption upon a finding that the Town Department or pesticide applicator has:

1. Identified a compelling need to use the pesticide
2. Made a good faith effort to find alternatives to the particular pesticide
3. Demonstrated that effective, economic alternatives to the particular pesticide do not exist for the particular use
4. Develop a reasonable plan for investigating alternatives to the pesticide in question during the exemption period.

The Town Manager may grant permission to use Roundup for right-of-way areas required by the Fire Marshall for fuel management should the cost of manually cutting back these areas become too costly. The use of Roundup on right-of-ways must also go through steps 1-4 in the Limited Products List.

The limited-use product will be allowed to be used for a short and defined exemption period, not to exceed 3 months.

Banned Use Products List:

The following high health-risk pest management products are completely banned from use on Town property:

1. Pesticides linked to cancer (U.S.E.P.A Class A, B, and C carcinogens and chemicals known to the State of California to cause cancer under Proposition 65)
2. Pesticides that cause birth defects, reproductive or developmental harm (identified by the U.S.E.P.A or known to the State of California under Proposition 65 as reproductive or developmental toxins).
3. Pesticides classified as Toxicity Category I and Category II by the U.S.E.P.A., Carbonate and organophosphate pesticides.
4. Foggers. bombs, fumigants or sprays that contain pesticides identified by the State of California as potentially hazardous to human health (CFR 6198.5)
5. Pesticides that interfere with human hormones

NOTIFICATION OF PESTICIDE APPLICATIONS:

The general public will be notified via post signs 72 hours prior to any pesticide application. The sign remains posted for a minimum of 72 hours after the application. Town staff or the pesticide applicator will make every effort to post signs at all usual public and employee entry points to the area where the pesticide is applied.

Additionally, information will be posted on the Town's website 72 hours prior to application and a minimum of 72 hours after application.

Notification will include:

1. The product name, EPA Registration # and active ingredient(s)
2. Intended areas and dates of application
3. Contact name and phone number for more information

PEST CONTROL AND RECORD KEEPING OF PESTICIDE APPLICATIONS

The Town shall maintain records of all pesticide applications to Town Property at the Park/Public Works office for a period of four (4) years, and shall make the information available to the public, upon request.

Each application record shall include the following information:

1 Name of the entity responsible
2 Specific site of the application

3 The target pest
4 The date the pesticide was used and re-entry period if applicable
5 Schedule, timing, and conditions
6 The name of the active ingredient of the pesticide(s) to be applied and EPA registration number and amount used
7 The pesticide signal word
8 Prevention and other non-chemical methods of control used.

EMERGENCY EXEMPTION PROCESS:

The IPM Coordinator will make a recommendation to the Town Manager to allow staff, or an outside landscape contractor to apply a pesticide not on the Approved Use List or Limited Use List based upon a finding that the protection of public health requires the use of that pesticide due to an emergency. The Town Manager intends that such exemptions shall be granted on a per-case basis and shall apply to a specific pest problem for a limited time, with selection of pesticides conforming to the spirit and intent of this policy as is deemed practicable. To the greatest extent practicable, the notification requirements apply in an emergency situation.

Attachment C.9.a (2)

STRUCTURAL IPM OPERATING PROCEDURES FOR THE TOWN OF MORAGA

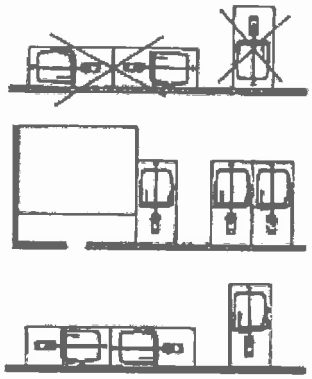
The best method of ridding any building of pest is to prevent the build from being infested before it becomes an issue. Below is a list of preventative maintenance measures that will help stop insect and rodents before they enter the buildings.

1. Caulk or patch around windows, water pipes and electrical lines that enter into structure. Make sure patch is smooth so rodents don't have anything to pull on.
2. Patch holes in siding that may allow insects and rodents to enter building
3. Inspect attic space during the day and look for daylight coming through holes in the roof and patch.
4. Inspect under eves for holes and patch. (access point for squirrels)
5. Install or repair window screens.
6. Exterior garbage cans should have lids to prevent rodents and insects access to can.
7. Empty interior garbage cans on a daily basis or as often as possible.
8. Store all food items in proper containers. Never leave food out over night.
9. Send annual memos to building occupants explaining the necessity to store food in the proper containers and not to leave food out over night.
10. Cut tree branches back at least 3 feet from buildings to prevent rodents from entering roof space.
11. Avoid planting nut or seed or fruit baring trees near building. (food source for rodents)
12. Remove dead or dying trees near buildings. Dead trees serve as a nesting area for animals, rodents and insects.
13. Avoid placing bird feeders near building. (food source for squirrels)
14. Remove all shrub trimmings and tree trimmings near buildings. (squirrels will gnaw on debris during the winter)
15. Cut down high grasses around buildings. High grass will attract mice.
16. Never stack wood or debris against builds. Rodents like to nest in wood and debris piles.
17. Keep exterior doors closed as often as possible.
18. Ensure all roof vent and foundation vents are intact.
19. Check buildings for water damage inside walls and floor. (breeding ground for silver fish)
20. Make sure there is no standing water around the buildings. (buckets of water, ect.)
21. Contact Contra Costa Vector Control and ensure adequate coverage of exterior pest is in place. (Bait stations are placed for rats and standing water near buildings is being sprayed for mosquitoes) *Keep in mind that Vector Control does not remove bees or yellow jackets.*

TOWN OF MORAGA METHODS OF EXTERMINATION FOR RATS AND MICE

1 to 3 Rats and or Mice

1. Confirm all preventative maintenance measures are in place.
2. Track droppings and urine trails to find access point.
3. Find food source, if any and remove.
4. Place wooden or eclectic traps near access point.
5. Document the number of traps and the location.
6. If evidence of rodent persists or increases after 3 to 5 days, inform immediate supervisor and request the use of poison.



Example of how and how not to place wooden rat and mouse traps.

3 or more

3 or more rats and or mice are considered an infestation, due to their rapid breeding habits.(*The current IPM agreement with the Town requires an approval from the Town Manager or acting T.M. for the use of poison*) **We shall only use poison bait blocks until further notice**.

NEVER LEAVE BOLCKS OUT DURING THE DAY WHEN PUBLIC IS PRESENT.

WEEKENDS WHEN FACILITY IS NOT IN USE AND LOCKED DOWN IS THE

ONLY EXCEPTION TO THIS RULE. ONLY INSTALL WHEN FACILITY IS

COMPLETELY VACANT. REMOVE BLOCKS THE FOLLOWING MORNING

BEFORE THE FACILITY IS OPEN INFORM STAFF OF USE OF POISON

Handling and installation instructions for Bait Blocks

Inform Town Manager of the infestation and request the use of poison. Only use ready to use bait blocks with hole drilled through the long side of the block. Follow instructions below for handling and installing bait blocks:

1. Always use disposable gloves when handling blocks.
2. Only install blocks after buildings operation hours are over and building is empty. (you may have to train janitor of how to install blocks or change your work schedule accordingly)
3. Locate area where rodents are gnawing or nesting and install bait block.
4. Place a 2 ½ inch screw through the hole in the bait block and screw block approximately 1 inch off the floor into the wall.
5. Place sign on the wall above the block reading: RODENT BLOCK DO NOT TOUCH
6. Dispose of gloves
7. Inspect blocks the following morning for evidence of gnawing and vacuum up any residual bait block crumbs.
8. Remove blocks
9. Repeat steps 1-8 until rodents have been eradicated. (Keep in mind rodents do not die instantaneously and they will search for water before dyeing).
10. Search for rodent carcasses. (remember your rodent problem will become an insect problem if you don't locate and remove carcasses)
11. If evidence of rodents persists, request the use of an exterminator, with the Town Managers approval.

Squirrels

1 to 3 Squirrels	Spread Habanera sauce on the area where the squirrel is attempting to enter building. This may deter the squirrels. Squirrels will attempt to enter builds underneath the eves. Where the exterior walls meet the roof line. Check if preventative maintenance measures are in place. If the squirrels have already entered the building, place a radio in the attic space and this may scare them away. Squirrels are active during the day. Mainly in the mornings to exit the build and forage for food and in the evenings when returning. Watch for squirrels exiting the building in the morning and block off hole. Keep in mind if the squirrel has babies the mother will more than likely chew another hole in the building to access babies or the babies will die in the attic. Squirrels are very hard to trap and there are no registered poisons currently available. Trapping and relocating is illegal in most states. If squirrel infestation persist or increases, request the use of a trapper or exterminator, with the Town Managers approval.
3 or more	Hire a licensed professional to remove squirrels **Performance Pest Management** **(877)-592-9041** **Wild Animal Removal Services (888)-488-7720**

MOSQUITOES *(interior infestation only)*

1 to 3 Mosquitoes

1. Ensure that preventative maintenance measures are in place. Screens are covering windows and doors aren't being left open. Mosquitoes are most active during the morning and dust.
2. Call Vector control and ensure they are spraying stagnate water ways near builds. There are very few methods of ridding a buildings of mosquitoes. The best method is to treat them outdoors before they enter the building.
3. If the mosquitoes have entered the building, place garlic cloves in the rooms with the worst infestation.
4. If this method is unsuccessful, buy a Mega – Catch Mosquito Trap. (safe for indoor use) CITRONELLA CANDELS ARE NOT SAFE FOR INDOOR USE.

3 or more

Request the use of an exterminator with the Town Managers approval.

Silverfish

1 to 10	Silverfish tend to dwell in attics, base boards, in cracks or in areas where books or fabrics are being stored. Silverfish can only survive in temperatures of 70-80 degrees with a relative humidity of 75-95 percent. They eat paper, glue and human food crumbs. They especially like cereals. There are very few methods of removing or exterminating Silverfish. The best defense against the Silverfish is to ensure all preventative maintenance measures are in place. Check the room for any water damage and repair. Check the room for evidence of any human food crumbs and remind tenants that they need to clean up after eating and store food properly. Inspect fabrics that have been stored for a long period of time. Try to store plans, book and fabrics in cool dry area. If you encounter an infestation of Silverfish in books or in fabrics, take the items and place in a sealed plastic bag and store in a refrigerator for 2 to 3 days until they are all dead. If encountering an area that consistently shows evidence of Silverfish, you may have to buy a dehumidifier and place near infestation.
10 or more	Request the use of an exterminator, with Town Managers approval.

Yellow jackets and Wasps *(Interior infestation only)*

1 to 3	Both species feed on protein. (meat) A yellow jacket nest can harbor up to 1,500 to 15,000 yelllow jackets. Wasp nests can harbor up to 15 to 200 wasps. Yellow jackets can nest underground or above in the eaves of buildings or from tree branches. Wasps tend to make their nests above ground in eaves or in a attic spaces.Yellow jackets make their nests out of fiber and saliva, where wasps make theirs primarily out of mud. Typicaly yellow jackets do not nest indoors, but it can happen. *If an indoor infestation occurs, feel for soft spots in the wall. Yellow jackets will use the wall boards for nesting material. When encoutering a wall infestation*, **do not attempt to remove them. Contact immediate supervisor and request the use of an exterminator.** The best method to stop yellow jackets from entering a building is to place lure traps at least 50' away from building. Do not palce any closer. You do not want to entice them in to the building. If encountering yellow jackets flying around inside a building, open a window or a door. **Do not attempt to kill with fly swatter.** Yellow jacket are very aggressive and swatting at them may cause them to retaliate.
3 or more	Request the use of an exterminator, with the Town Managers approval.

Flies

	Flies breed in animal waste or decaying organic material from which they can pick up bacteria and viruses that may cause human diseases.
1 to 3	As always the best method of stopping a fly infestation in a building is to stop them before they enter. Ensure that all preventative maintenance measures are in place. Make sure that interior garbage cans are empted daily. Make sure food isn't being left out and ensure window screens are intact and in place. Search building for dead animal carcasses. If all preventative measures are in place and flies infestation persists, follow these steps.
	Hang fly paper from the ceiling of the room with the worst infestation.
	If fly paper doesn't work. Hang citrus smelling pomanders or branches of pine in the room. The smell may drive the flies out.
3 to 6	Purchase inverted cone traps and place in room with infestation.
6 or more	Seek permission to use exterminator, with Town Managers approval.

BEES *(interior infestation only)*

1 to 3

Bees typically nest outdoors. On rare occasions they have been found inside of structures nesting in the walls. Their storage of honey invites other bees, wasps, beetles and moths. If encountering a nest inside of a wall, it is important to remove them as quickly as possible. Humans can be allergic to bee stings and on rare occasions cause serious health risks. If encountering a nest inside a wall, follow these steps:

1. Remove all occupants from the room.
2. Lock building or room and do not allow access.
3. Inform building supervisor or recreation leader.
4. Request permission from the Town Manager to contract a bee keeper or an exterminator.
5. Document the day's events. (Where the nest was found, time, date and what action was taken.

If a building occupant has been stung , remove the stinger quickly. Either brush the stinger off or scape.It doesn't matter how it is removed, just as long as it is remove as quickly as possible.

Termites

Termites thrive in warm humid areas. Basements and crawl spaces are especially attractive to termites.Termites look like winged ants before they enter a building. When inspecting buildings, look for darkening or blistering wood. You will usually see wings lying around on windowsills or what looks to be sawdust. You will also see small holes in the wood.

It is almost impossible to stop termites from entering a building, but you can slow them down by making sure that all roof and foundation vents are intact and seal any cracks in basement subfloors. Hire a licensed contractor to annual spray around buildings. As per our IPM agreement we shall use the least toxic product available. Ask the contractor to use an orange rind based product when initially treating for termites. If infestation persists or increases. Seek approval from the Town Manager to use a more lethal product.

Ants

There are 12,000 different types of ants. The Argentine ant is most common in Northern California. Some queen Argentine ants can live for many years having millions of babies. Ants do not cause any serious health risks, but they can contaminate food with their waste.

Ants are simply everywhere, but they are relatively easy to get rid of. There are several non-toxic methods of removing ants from a building. With that being said, there are very few occasions that will call for the use of poison. *When encountering an infestation of ants on a Friday with a wedding the following day, call your immediate supervisor and explain the situation and request the use of poison. If encountering an infestation that persists for over a week, call your immediate supervisor and explain the situation.*

Follow these steps when dealing with ants inside a building:

1. Find the food source and remove.
2. Follow the trail of ants to where they are entering the building.
3. Choose a mixture of the following products to remove ants.
   A. Fill a squirt bottle with 1/3 water, 1/3 Windex and 1/3 Ivory dish soap. **OR**
   B. Fill a squirt bottle half way with water and fill the rest with white vinegar.
4. Liberally apply your product to the hole where ants are entering building.
5. Wet down your sponge or mop with your product and wipe the ants up. (Ants lay down an alkaline trail when search for food. This enables them to follow an exact trail to their food source and it also allows the other ant to find the food easily. Wiping their trail away confuses them and they will stop following the same trail to find their food.)
6. After the ants have been cleaned up. Lay down a small pile of black pepper or cinnamon in front of their access hole.(ants do not like pepper or cinnamon and they should stop accessing the hole)
7. Repeat steps 1-6 for 2 to 3 days until ants are gone.