City of East Palo Alto

Fiscal Year 2012-2013 Annual Report

for the

Municipal Regional Permit for

National Pollutant Discharge Elimination System Permit

Order R2-2009-0074

CITY OF EAST PALO ALTO

OFFICE OF THE CITY MANAGER

2415 University Avenue • East Palo Alto, CA 94303

September 13, 2013

Ms. Sue Ma
California regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street Suite 1400
Oakland, CA 94612

Subject: Annual Report Fiscal Year 2012-2013 for Municipal Regional Permit for National Pollutant Discharge Elimination System Permit Order R2-2009-0074 City of East Palo Alto

Dear Mrs. Ma,

The enclosed report contains City of East Palo Alto's Annual Report for consideration of compliance with our MRP requirements as set forth in the above referenced permit.

I certify under penalty of law that this document and all attachments (submitted electronically) 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 person or persons who manage the system, or those persons directly responsible for gathering the information, the enclosed details are, 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.

The City remains committed to full compliance with the Municipal Regional Permit and is actively working to prevent pollutants from entering our storm water system. If you have any questions about our Clean Bay Program, please contact Ms. Michelle Daher at (650) 853-3197 or via email at mdaher@cityofepa.org .

Sincerely,

Kamal Fallaha

Kamal Fallaha, City Engineer

CITY OF EAST PALO ALTO
COMMUNITY DEVELOPMENT DEPARTMENT
1960 TATE STREET, EAST PALO ALTO, CA 94303
PHONE: 650-853-3189, FAX: 650-853-3179

Executive Summary

Date: September 11, 2013

To: San Francisco Regional Water Quality Control Board

From: John Doughty, Community Development Director

Re: 2012/2013 Annual National Pollution Discharge Elimination System Municipal Regional Permit Report

Dear Regional Board and Staff:

The City of East Palo Alto appreciates guidance from the Water Board as the Community Development Department (CDD) continues to actively improve the health of local waterways, while progressing towards full compliance with the National Pollution Discharge Elimination System Municipal Regional Permit through the Clean City, Clean Bay Program, and the Partnership in Pride Campaign. These ongoing efforts, under my direction, ensure the City of East Palo Alto is working with outside agencies and local partners to shape a dynamic and complete set of tools, employed to help improve the health of our residents, San Francisquito Creek and the San Francisco Bay.

Through the Clean City, Clean Bay Program, my staff collaborates with the San Mateo County Water Pollution Prevention Program, San Mateo County Environmental Health Department, the Santa Clara Valley Water District, the San Francisquito Creek Joint Powers Authority, the Water Board, other agencies, and all Divisions of CDD, to identify and reduce pollution potential, thereby improving the health of people and local waterways. Through this effort, we target specific ongoing stormwater impairment sources with methods that will cut recurrence. Program focal points during FY 12/13 included: responding to community complaints about potential stormwater impairment sources, reviewing and commenting on all new and redevelopment projects, inspecting local construction sites and businesses, updating the Enforcement Response Plan (ERP) and Business Inspection Plan (BIP), while working to engage the community in water quality improvement efforts. In addition, my staff has taken the time to help develop and implement the Regional "Be the Street" ad campaign and assisted in the ongoing effort to

develop a Bay Area regional brand for watershed protection. We will continue to support these, and other, efforts, and help in determining their efficacy.

The Partnership in Pride Campaign was established by my team to integrate local non-profits, leaders, residents, businesses, and agencies in a partnership dedicated to educating the public on watershed protections. A first step towards gaining voluntary compliance with the City's Stormwater Ordinance, the Campaign's goal is to reduce the incidence of escalating enforcement through public education and outreach, with a focus on civic pride, family health and safety. If voluntary compliance is unsuccessful, the City has support mechanisms to ensure compliance through the ERP and the Stormwater administrative penalty schedule. Partnership in Pride Campaign efforts conducted in FY 12/13 included: three "Make Your Own Reusable Bag" events, two "Be the Street" events, four citywide cleanup events, support of a summer-long volunteer cleanup effort, three outreach-focused tabling events, participation and outreach at local business district meetings, and a mass mail distribution of updated source control brochures sent to all residents, to name just a few.

While CDD continues to advance and execute the Clean City, Clean Bay Program and the Partnership in Pride Campaign, I appreciate the Water Board's approval to extend the deadline allowed for the City to respond to the Notice of Deficiency regarding ERP and BIP deficiencies, received during FY 11/12. By extending this deadline to September 16, 2013, the City was able to update our ERP and BIP in a synchronized manner with annual program adjustments and staffing constraints, allowing for cohesive inter-departmental collaboration on these vital compliance tools. It is my hope that the Water Board will consider aligning future NOD deadlines with Annual Report submittals, whenever possible, as this has ensured my staff can make adjustments corresponding with our City's staffing and scheduling limitations and take adequate time for interdepartmental coordination and review.

Sincerely,

John T. Doughty
Community Development Director

CC:
Magda Gonzales, City Manager
Matt Fabry, SMCWPPP

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ATTACHMENT B

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Section **Page**

Section 1 – Permittee Information

Background Information

Permittee Name:	City of East Palo Alto				
Population:	28,502				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2009-0074R				
Reporting Time Period (month/year):	July 2012 through June 2013				
Name of the Responsible Authority:	Kamal Fallaha			**Title:**	City Engineer
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	**Zip Code:**	94303	**County:**	San Mateo
Telephone Number:	650-853-3117	**Fax Number:**			
E-mail Address:	kfallaha@cityofepa.org				
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle Daher			**Title:**	Environmental Coordinator
Department:	Community Development Department				
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	**Zip Code:**	94025	**County:**	San Mateo
Telephone Number:	(650) 853-3197	**Fax Number:**			
E-mail Address:	mdaher@cityofepa.org				

Section 2 - Provision C.2 Reporting Municipal Operations

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

1) In FY 12/13, the City participated in the SMCWPPP Public Works Municipal Maintenance Subcommittee, 2) the May 23rd Municipal Maintenance Workshop, 3) the San Mateo County Integrated Pest Management training, 4) Construction Workshop. The city also provided training entitled "five minute BMPs" to municipal staff, along with pesticide applicators training and integrated pest management training

The City received a notice of deficiency for FY 11/12 annual report regarding the Corporation Yard inspection program as items indicated on the Inspection Report did not clearly state when the items that required remedy were corrected; a correction was provided to the Water Board explaining that all items were corrected during the inspection. Subsequently, the City has reduced the amount of containers stored at the Corporation Yard as the former residential drop-off services have been suspended. The most recent Corporation Yard Inspection indicated improvements to overall best management practices, with chemicals and gasoline containers clearly labeled and stockpiles covered.

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

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

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

Comments:

The City implemented best management practices for street and road repair work, typically conducting slurry seal and road patching, with contractors utilized for major roadway construction projects, with contractual requirements to implement CASQA approved best management practices.

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

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

Y	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
Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs

Comments: **The City rarely if ever conducts sidewalk and plaza maintenance and pavement washing, but when necessary, utilizes the City's vactor truck or wet vacuum to remove any wash water prior to it entering the City storm drain inlets or waterways.**

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

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

NA	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
Y	Control of discharges from graffiti removal activities
NA	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
Y	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
NA	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 City does not have any bridges that are directly over waterways or storm drains. The City does control discharges from graffiti removal activities and utilizes BASMAA Mobile Surface Cleaner Program to implement BMPs for graffiti removal.

C.2.d. ►Stormwater Pump Stations

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

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

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

Pump Station Name and Location	**First inspection Dry Weather DO Data (Forebay)**		**Second inspection Dry Weather DO Data (Pumping active)**	
	Date	**mg/L**	**Date**	**mg/L**
O'Connor Pump Station	**06/10/2013**	**7.8**	**06/10/2013**	**8.5**
O'Connor Pump Station	**06/24/2013**	**7.1**	**06/24/2013**	**7.3**

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: **The City conducts two inspections annually on the single pump station serving the City of East Palo Alto. During this DO test, two DO tests are performed: 1)inside the forebay chamber prior to the pump action, and 2) at the pump discharge point once the pumps are activated.**

Attachments:

A, 06/10/13 and

B. 06/24/13

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)
O'Connor Pump station	**11/17/12**	**Yes~1**	**No**	**No**	**No**	**No**
O'Connor Pump station	**11/21/12**	**Yes~1.25**	**No**	**No**	**No**	**No**
O'Connor Pump station	**11/28/12**	**Yes~1.5**	**No**	**No**	**No**	**No**
O'Connor Pump station	**12/1/12**	**Yes~1.75**	**No**	**No**	**No**	**No**
O'Connor Pump station	**12/2/12**	**Yes~2.**	**No**	**No**	**Yes**	**No**
O'Connor Pump station	**12/3/12**	**Yes~2.25**	**No**	**No**	**Yes**	**No**
Pump Station Name and Location	**Date**	**Presence of**	**Presence of**	**Presence of**	**Presence of**	**Presence of**

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

	(2x/year required)	**Trash** (Cubic Yards)	**Odor** (Yes or No)	**Color** (Yes or No)	**Turbidity** (Yes or No)	**Floating Hydrocarbons** (Yes or No)
O'Connor Pump station	**12/23/12**	**Yes~2.5**	**No**	**No**	**Yes**	**No**
O'Connor Pump station	**12/25/12**	**Yes~2.75**	**No.**	**No**	**Yes-Minor**	**No**
O'Connor Pump station	**2/7/13**	**Yes~3**	**No**	**No**	**No**	**No**
O'Connor Pump station	**2/19/13**	**Yes~3**	**No**	**No**	**No**	**No**
O'Connor Pump station	**3/19/13**	**Yes~3**	**No**	**No**	**No**	**No**

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

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

Comments including listing increased maintenance in priority areas:
The City of East Palo Alto does not own or maintain any rural roadways.

[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 **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
X	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 City of East Palo Alto conducts one or two Corp Yard Inspections per year to determine whether BMPs are being implemented and to inspect for site housekeeping practices in alignment with MRP requirements.

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**
City of East Palo Alto Corp Yard 150 Tara Road	**October 9, 2012**	**A. Containers for Recycling required a tarp/cover at the time of the inspection. The site manager determined it is infeasible to continuously cover these very large bins and has subsequently shut down the recycling collection service that the City previously provided for residents. The bins are now smaller and only require closing the lids**	**No follow-up actions required. All items corrected at time of inspection. Additional actions (not required) included elimination of residential drop-off collection program.**

		that come with the smaller containers. **F. Hazardous waste was unlabeled and required labeling at the time of the inspection. City has subsequently stopped accepting hazardous waste from the public and now only accepts pre-labeled containers from San Mateo County Environmental Health inspectors who come out to the City to label illegally dumped hazardous waste which the City brings back to the Corp Yard to store until a large enough source is combined to warrant a trip to the County services for recycling. All hazardous waste is kept under a storage cover.** **G. Recycling bins and hazardous waste were difficult to cover at time of inspection due to large sized bins, as tarps blow around and result in difficulty for proper storage, although they were covered at the time of the inspection. Within one week of inspection, site manager removed these containers from site and eliminated this service to the public due to concerns about management issues on site—this was not a requirement, but rather a response to a long term problem of implementing BMPs.** **Stockpiles were covered during time of inspection.** **All items were corrected at the time of the inspection, with additional corrective actions taken to remove any potential pollution, as noted above.**	

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

C.3.b.v.(2)(a) ►Green Streets Status Report

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

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

Summary:

The C.3 New Development and Redevelopment section of the SMCWPPP FY 12-13 Annual Report includes a description of activities conducted at the countywide or regional level.

C.3.b.v.(2)(c) ►Summary of Green Street Projects Completed by January 1, 2013

(For FY 12-13 Annual Report only) Provide a summary of all green street projects completed by January 1, 2013.

Summary:

BASMAA has prepared a regional summary of all green street pilot projects. The Green Street Pilot Project Summary Report is being submitted by BASMAA, on behalf of the MRP permittees, in BASMAA's MRP FY 12-13 Regional Supplement – New Development and Redevelopment. The Green Streets Pilot Project Summary Report contains all of the required elements listed in Provision C.3.b.v.(2)(c) for all green street projects completed by January 1, 2013, as well as information on projects not yet completed.

C.3.b.v.(1) ►Regulated Projects Reporting

Fill in attached table **C.3.b.v.(1)** or attach your own table including the same information. **The city of East Palo Alto reviewed each new and redevelopment project proposal during in FY 12/13, to ensure compliance with the MRP, including capital projects.**

As applicable, the City approved several projects that fall under Regulated status, as indicated in the following form.

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

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

Comments (optional): **The City did not approve any in-lieu or alternative compliance projects in FY 12/13.**

C.3.e.vi ► Special Projects Reporting

1. Has your agency received, but not yet granted final discretionary approval of, a development permit application for a project that has been identified as a potential Special Project based on criteria listed in MRP Provision C.3.e.ii(2) for any of the three categories of Special Projects (Categories A, B or C)?		**Yes**	X	**No**
2. Has your agency granted final discretionary approval of a project identified as a Special Project in the March 15, 2013 report? If yes, include the project in both the C.3.b.v.(1) Table, and the C.3.e.vi. Table.		**Yes**	X	**No**

If you answered "Yes" to either question,

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

Guidance: The City did not approve special projects in FY 12/13.

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

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:

The City inspected several bio-based treatment facilities and one stormwater vault/proprietary device during FY 12/13, and conducted one installation inspection for several devices located at one project site.

(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 City has found that the O&M Inspection verification program is helpful to ensure biotreatment & proprietary systems are functioning and maintenance is kept up. Without the O&M Verification process, there is not a great deal of evidence that voluntary maintenance would occur. The city will continue to monitor and work with property sites to ensure maintenance is ongoing.** **In at least one location, ongoing site housekeeping issues have indicated that the business inspection plan is certainly a concurrent tool that helps staff identify sites that require immediate maintenance. For this site, it is likely that the following year the same site will be targeted for inspection once again, to insure ongoing maintenance has been conducted.**						
(4) During the reporting year, did your agency:						
• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?	X	**Yes**		**No**		**Not applicable. No new facilities were installed.**
• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls?[3]	X	**Yes**		**No**		**Not applicable. No treatment measures**
• Inspect at least 20 percent of the total number of installed vault-based systems?	X	**Yes**		**No**		**Not applicable. No vault systems.**
If you answered "No" to any of the questions above, please explain:						

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

On an annual basis, discuss the implementation of the requirements of Provision C.3.i, including ordinance revisions, permit conditions, development of standard specifications and/or guidance materials, and staff training.

Summary:

BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Co-permittees. We have modified local ordinances/policies/procedures and forms/checklists to require all applicable projects approved after December 1, 2012 to implement at least one of the site design measures listed in Provision C.3.i. We are using the following Program and BASMAA

[3] If there is only 1 treatment measure in the jurisdiction, the agency must inspect it every year.

products for C.3.i implementation: clustered impervious surfaces, strong recommendations for self-treating areas, planting interceptor trees and use of pervious pavement whenever possible. Incidence of voluntary compliance has been very high for all projects, even single family residential improvements, as 49% of the City is in designated flood zone, residential and business owners are compelled to reduce stormwater flow from their own sites for the greater good.

Furthermore, we utilize the following tools for encouraging modern techniques in developments.

- BASMAA's site design fact sheets
- The SMCWPPP C.3 Regulated Projects Checklist
- C.3.i guidance provided by the SMCWPPP C.3 Stormwater Technical Guidance document Appendix L
- Two City staff members attended the May 22, 2013 New Development Workshop for small projects

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[10], Street Address	Name of Developer	Project Phase No.[11]	Project Type & Description[12]	Project Watershed[13]	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft^2)[14]	Total Replaced Impervious Surface Area (ft^2)[15]	Total Pre-Project Impervious Surface Area[16] (ft^2)	Total Post-Project Impervious Surface Area[17] (ft^2)
Private Projects											
1160 Weeks Street	**1160 Weeks Street**	**NHA Investments**	**Not Phased**	**Four unit residential subdivision**	**San Francisquito Creek via Runnymede Drainage Channel (closed system as of this date— stormwater does not leave Weeks Street)**	**27,065.58**	**0.621 acres**	**13,733.62 square feet** **<6,246.70 housing and driveway square feet self-treating>** **Total Regulated Area : 7,486 square feet uncovered parking**	**0/ NONE**	**0/NONE**	**13,733.62 square feet** **<6,246.70 housing and driveway square feet self-treating>** **Total Regulated Area: 7,486 square feet uncovered parking**
Public Projects											
No Regulated Projects Approved FY 12/13	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY	None approved this FY

[10] Include cross streets
[11] 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".
[12] 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.
[13] State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.
[14] All impervious surfaces added to any area of the site that was previously existing pervious surface.
[15] All impervious surfaces added to any area of the site that was previously existing impervious surface.
[16] For redevelopment projects, state the pre-project impervious surface area.
[17] 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 (private projects)										
Project Name Project No.	Application Deemed Complete Date[18]	Application Final Approval Date[19]	Source Control Measures[20]	Site Design Measures[21]	Treatment Systems Approved[22]	Type of Operation & Maintenance Responsibility Mechanism[23]	Hydraulic Sizing Criteria[24]	Alternative Compliance Measures[25/26]	Alternative Certification[27]	HM Controls[28/29]
Private Projects										
1160 Weeks Street	June 24, 2013	June 24, 2013	Clustered impervious surface areas, covered trash containers, disconnected downspouts	Pervious pavement, self-retaining areas.	Bioretention area in parking area	O&M is in the CC&R's and will be the responsibility of each home owner on the subdivision.	Volume based sizing (applicant used 90% total runoff for 100 year event=2.92 inches/hour), oversized to treat the driveway/parking area).	None	None	None

Comments:

Although many project plans were reviewed and submitted for consideration, a single project was deemed complete during FY 12/13.

[18] For private projects, state project application deemed complete date. If the project did not go through discretionary review, report the building permit issuance date.

[19] For private projects, state project application final discretionary approval date. If the project did not go through discretionary review, report the building permit issuance date.

[20] 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.

[21] 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.

[22] 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.).

[23] 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.

[24] 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).

[25] 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.

[26] 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.

[27] Note whether a third party was used to certify the project design complies with Provision C.3.d.

[28] If HM control is not required, state why not.

[29] 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 (public projects)										
Project Name Project No.	**Approval Date[30]**	**Date Construction Scheduled to Begin**	**Source Control Measures[31]**	**Site Design Measures[32]**	**Treatment Systems Approved[33]**	**Operation & Maintenance Responsibility Mechanism[34]**	**Hydraulic Sizing Criteria[35]**	**Alternative Compliance Measures[36/37]**	**Alternative Certification[38]**	**HM Controls[39/40]**
Public Projects										
None approved this FY	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**	**None approved this FY**

Comments:

No Regulated projects were approved during FY 12/13

[30] For public projects, enter the plans and specifications approval date.
[31] 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.
[32] 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.
[33] 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.).
[34] List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc…) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.
[35] 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).
[36] 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.
[37] 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.
[38] Note whether a third party was used to certify the project design complies with Provision C.3.d.
[39] If HM control is not required, state why not.
[40] 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. ►Table of 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)[41]	Party Responsible[42] For Maintenance	Date of Inspection	Type of Inspection[43]	Type of Treatment/HM Control(s) Inspected[44]	Inspection Findings or Results[45]	Enforcement Action Taken[46]	Comments/Follow-up
Fire Station 2	2290 University Ave	Yes	Menlo Park Fire Protection District	June 6, 2013	Installation	Storm tank detention basin, Contech Stormfilter, sand and grease interceptor, sewer/sanitary switch valve for washdown activities, biotreatment areas	Installed well. Very light litter on site—removed at time of inspection. No issues found.	None. Not required	Annual maintenance
Cummings Park/ Firehouse grill	1765 e. Bayshore Rd	No	Ehab Youusef via Leticia Jensen (Firehouse Grill)	April 18, 2013	Annual	Kristar media filter device Trench Drain Stormdrain Inlet	Site was cleaned prior to inspection. Previous business inspection revealed poor site housekeeping which required follow-up inspection. All issues resolved prior to this stormwater treatment facility inspection.	None. Not required.	Annual inspection required for FY 13/14 due to issues of site housekeeping during FY 12/13.
La Estrellita	2387 University Ave	No	Hector Cornelio	June 17, 2013	Bioswales	4 (four) vegetated swales	Site was maintained. Requested owner remove filter fabric from storm drain inlets at time of inspection and pick up litter around the site.	None.	Annual inspection due to heavy traffic (ped. litter & debris) & filter fabric in storm drains.

[41] Indicate "YES" if the facility was installed within the reporting period, or "NO" if installed during a previous fiscal year.
[42] State the responsible operator for installed stormwater treatment systems and HM controls.
[43] State the type of inspection (e.g., 45-day, routine or scheduled, follow-up, etc.).
[44] 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.
[45] State the inspection findings or results (e.g., proper installation, improper installation, proper O&M, immediate maintenance needed, etc.).
[46] State the enforcement action(s) taken, if any.

C.3.e.vi.Special Projects Reporting Table Reporting Period – January 1 – June 30, 2013												
Project Name & No.	Permittee	Address	Application Submittal Date[47]	Status[48]	Description[49]	Site Total Acreage	Density DU/Acre	Density FAR	Special Project Category[50]	LID Treatment Reduction Credit Available[51]	List of LID Stormwater Treatment Systems[52]	List of Non-LID Stormwater Treatment Systems[53]
No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013	No Special Projects were Approved between Jan.1-June 30, 2013

[47] Date that a planning application for the Special Project was submitted.
[48] Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.
[49] Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.
[50] For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.
[51] For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.
[52]**:** List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.
[53] List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

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

Program Highlights

Provide background information, highlights, trends, etc.

City of East Palo Alto Program Highlights: 1) updating business inspection plans, facilities lists, and inspection frequencies and priorities; 2) updated Enforcement Response Plan, 3) conducting increasing numbers of complaint-based inspections; 4) conducted training for local businesses and municipal maintenance division; 5) participating in the Commercial, Industrial and Illicit Discharge (CII) Subcommittee; and 5) obtained training through the CII Inspectors Training (SMCWPPP); 6) Established the Partnership in Pride Campaign to encourage local partnership in waterquality improvements as a pre-enforcement tool to gain voluntary compliance through education/outreach.

Refer to the C.4. Industrial and Commercial Site Controls section of the SMCWPPP FY 12-13 Annual Report (if applicable) for a description of activities of SMCWPPP and/or the BASMAA Municipal Operations Committee.

The City updated the BIP and ERP based on an NOD received for these two plans. The City took months to replace these documents, ensuring that they are adequately updated so as to be dynamic tools that can be continuously referred to in the field. The final documents were a collaborative effort between the City Attorney's office, Building Department, Code Enforcement office, and Community Development Department and align with all the appropriate authorities and enforcement plans with these departments.

C.4.b.i. ► Business Inspection Plan

Do you have a Business Inspection Plan?	X	Yes		No

If No, explain:

C.4.b.iii.(1) ► Potential Facilities List San Mateo County Environmental Health has identified for Haz Mat and Food Inspections, including Stormwater

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.

Priority Level	Facility Name	Address	Business Category
Med	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive
Med	ACE FIRE EQUIPMENT & SVC CO INC	1870 BAYSHORE	industrial
Med	AUTOZONE #3302	2160 UNIVERSITY AVE	hazmat
Med	Carlos Auto	350 Demeter St #4B	automotive
Med	CARNICERIA RODRIGUEZ	2398 UNIVERSITY AVENUE	food
Med	CASE FURNITURE	2526 PULGAS AVENUE	hazmat
Med	Catered Too	325 Demeter Street	food
Med	CAVALLINO RAMPANTE LTD. (DBA)	1880 W BAYSHORE ROAD	industrial
High	CEO STEEL FABRICATION, INC	2530 PULGAS AVENUE	hazmat
Med	CESAR CHAVEZ ACADEMY	2350 RALMAR	food
Med	COSTANO ELEMENTARY SCHOOL	2695 FORDHAM	food
Med	E PALO ALTO SHELL	2194 UNIVERSITY	hazmat
Med	EL SABOR MICHOCANO	2398 UNIVERSITY	food
High	EPA CORP YARD	150 Tara road	hazmat
Med	EPA Fish 'n Chicken	2150 University Ave	food
Med	Four Seasons Hotel	2050 University Ave	food
Med	GARDEN SUPER MARKET	1933 PULGAS AVENUE	food
Med	HOME DEPOT #6603	1781 EAST BAYSHORE ROAD	nursery
High	INFINITY SALVAGE	2091 BAY ROAD	automotive
Med	Izzy's Brooklyn Bagels	2220 B University Ave	food
Med	J.D.P. RECYCLING	2535 PULGAS AVE	recycling
Med	C.S. TRUCKING	2535 PULGAS AVENUE	automotive
Med	JUST LUNCH	1950 UNIVERSITY	food
Med	LA ESTRELLITA MARKET	2387 UNIVERSITY AVENUE	food
Med	LA TIENDITA SUPERMARKET	510 O'CONNOR STREET	food

Priority Level	Facility Name	Address	Business Category
Med	LAS ADELITA'S RESTAURANT	2373 UNIVERSITY AVENUE	food
Med	LEE'S BACKHOE SERVICE	1800 BAY ROAD	automotive
Med	LLANOS AUTO REPAIR	1849 BAY Road	automotive
Med	LOS ROBLES MAGNET ACADEMY	2450 RALMAR	food
Med	NEWBRIDGE MARKET	922 NEWBRIDGE STREET	food
Med	OAKWOOD MARKET	2106 OAKWOOD DRIVE	food
Med	OCEANNA CAFÉ	1781 BAYSHORE	food
Med	ONE STOP MARKET	1493 EAST BAYSHORE ROAD	food
Med	OUR COMMON GROUND, INC.	2560 PULGAS AVE	nursery
Med	PAL MARKET, INC.	2398 UNIVERSITY AVENUE	food
High	PITCHER DRILLING	218 DEMETER STREET	industrial
Med	SF SOUP CO	2050 University Ave	food
Med	STARBUCKS COFFEE CO 5977	1765 E BAYSHORE ROAD	food
Med	TACO BELL PIZZA HUT EXPRESS	1701 EAST BAYSHORE ROAD STORE#20635	food
Med	Taqueria La Cazuela	2386 Clarke Ave	food
Med	Taqueria Los Temos	1491 East Bayshore Road	food
Med	THREE BROTHERS TACOS	2220 UNIVERSITY AVENUE	food
Med	THREE BROTHERS TACO'S TRUCK #2	2220 UNIVERSITY AVENUE	food
High	TORRES PRINTEX	1175 WEEKS	Light industrial
Med	TOU BAR EQUIPMENT COMPANY INC.	2535 PULGAS AVENUE	automotive
Med	Touchatt Trucking	2535 PULGAS	automotive
Med	HEW DRILLING COMPANY	1045 WEEKS	Light industrial
Med	2 LOPEZ TRUCKING, INC	865 WEEKS STREET	automotive
Med	7-ELEVEN #2230-14336E	77 NEWELL ROAD	food
Med	ASPIRE EAST PALO ALTO CHARTER SCHOOL	1286 RUNNYMEDE	food
Med	BRENTWOOD SCHOOL	2086 CLARKE	food
Med	CAL-SPRAY, INC.	1905 BAY ROAD	Light Industrial
Med	CHEVRON CONV. STORE #1706	2101 UNIVERSITY AVE	Food
Med	COLLECTIVE ROOTS	1425 BAY ROAD	nursery
Med	COOLEY AVENUE MARKET	2235 COOLEY AVENUE	food

Priority Level	Facility Name	Address	Business Category
Med	EASTSIDE COLLEGE CAFETERIA	1043 MYRTLE	food
Med	EAST SIDE MARKET	2368 CLARKE AVE	food
Med	EAST PALO ALTO SENIOR CENTER	560 bell st	food
Med	EMMANUEL BAKERY & PIZZERIA	1489 EAST BAYSHORE ROAD	food
Med	GLOBAL STEEL FABRICATION, INC	255 DEMETER	Light Industrial
Med	IKEA US WEST INC-347	1700 EAST BAYSHORE ROAD	retail
Med	WBSD ILLINOIS PURDUE PUMP STA	335 DEMETER	Light industrial
Med	MCDONALDS RESTAURANT	1721 BAYSHORE	food
Med	MCDONALDS RESTAURANT	2401 UNIVERSITY	food
Med	OCONNOR PUMP STATION	1180 OCONNOR	industrial
Med	OFFICE DEPOT #00978	1761 EAST BAYSHORE ROAD	retail
Med	PARKING CO OF AMERICA	160 DEMETER	automotive
Med	PG&E COOLEY LANDING SUBSTATION	2000 BAY	industrial
Med	RAVENSWOOD CITY SCHOOL DIST	2160 EUCLID	hazmat
Med	RAVENSWOOD CHILD DEVELOPMENT CT	951 OCONNOR	food
Med	RONALD MCNAIR SCHOOL	2033 PULGAS	food
Med	TOGO'S/BASKIN ROBBINS	1741 EAST BAYSHORE ROAD	food
Med	WELLS REIT II-UNIVERSITY CIRCLE	1900 UNIVERSITY	food
Med	Bay Area Seafood Inc	2520 Pulgas Ave	food
Med	Charlie's Market	1441 E Bayshore Rd	food
Med	COUNTRY TIME MARKET	2200 UNIVERSITY AVENUE	food
Med	EL JAROCHO TAQUERIA	2395 UNIVERSITY AVE	food
Med	JAMBA JUICE #1131	1765 E BAYSHORE ROAD	food
Med	RANCHO GRANDE SUPERMARKET	2148 UNIVERSITY AVENUE	food
Med	Menlo Food Corp	175 Demeter	food
Med	MI PUEBLO FOOD CENTER #15	1731 E BAYSHORE ROAD	food

C.4.b.iii.(1) ► Potential Facilities List City of East Palo Alto Environmental Health has identified as having reasonable potential for stormwater impairment.

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.

Priority Level	Facility Name	Facility address	Type of Business	Year of Inspection	Last Inspection
HIGH	El Jarocho	2393 University Ave	food/stormwater	2013/2014	3/29/2012
High	A'S TOWING	1885 BAY ROAD	automotive	2013/2014	11/7/2012
High	Alfredo's carpet cleaners	831 Weeks st	Painting	2013/2014	5/31/2012
High	Bridge Property Management	1969 Tate Street	residential high density apartments	2013/2014	4/2/2013
High	CS Trucking	2535 Pulgas Ave	trucking	2013/2014	10/3/2012
HIGH	Firehouse Grill	1765 E. Bayshore Rd	food (stormwater issues)	2013/2014	4/8/2013
High	La Estrellita	2387 University Ave	food/stormwater	2013/2014	07/20/12, 3/29/2013,
High	Light Tree Apartments	1805 E. Bayshore Rd	apartments	2013/2014	7/15/2013
High	Menlo Food Corp	175 Demeter	Referred CEH	2013/2014	6/20/2012
High	Mi Pueblo	1731 E. Bayshore	food/stormwater	2013/2014	5/14/2012
High	Mikes Trucking	2527 Hazelwood Wy	automotive	2013/2014	03/14/2012,
High	Palo Alto Concrete	1923 Pulgas	construction	2013/2014	10/8/2012, 10/14/2012
High	Rainer's Service Station	1905 East Bayshore Road	tires	2013/2014	5/31/2012
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2013/2014	11/30/2012
High	SPECIALTY TOWING AND RECOVERY INC	2666 MIDDLEFIELD RD #B	towing	2013/2014	10/2/2012
High	Starbucks	1745 E Bayshore	food (stormwater issues)	2013/2014	5/16/2013
HIGH	SUNRISE ENTERPRISE 87, INC	264 TARA ST	towing	2013/2014	6/20/2012, 10/02/2012

HIGH	Toubar Equipment, CS Trucking, JDP recycling	2535 Pulgas Ave	automotive	2013/2014	6/5/2012
HIGH	WOODLAND ARMS APARTMENTS EQR	466 O'Keefe mike Riley 566-2013	residential high density apartments	2013/2014	5/28/2013
HIGH	Winston Taylor Concrete	1195 Garden	construction	2013/2014	10/03/2012
Priority Level	Facility Name	Facility address	Type of Business	Year of Inspection	Last Inspection
High	Oasis Painting	2374 Palo Verde Ave	HOME BASED BUSINESS	2013/2014	5/24/2012
Medium	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive	2013/2014	6/5/2012
Medium	A-1 Auto	2526 PULGAS	automotive, towing	2013/2014	6/5/2012
Medium	Ana's Party Store	910 Newbridge St	retail	2013/2014	
Medium	ARTEAGA AUTO CLEANING AND DETALLING	867 Weeks St	mobile auto	2013/2014	
Medium	Carlos Auto	350 Demeter	automotive	2013/2014	1/29/2013
Medium	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2013/2014	Prior to Oct 1, 2013
Medium	Global Steel	255 Demeter	Industrial	2013/2014	11/30/2012
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	possible 2013/2014 new location	5/31/2012
Medium	JAT TRUCK #1	1244 LAUREL AVENUE	mobile auto	2013/2014	
Medium	JBR Taxi Cab	1885 East Bayshore Road #99	automotive	2013/2014	

Medium	LA FAMILIA DISCOUNT	1803 BAY ROAD	retail	2013/2014	
Medium	Las Aldelitas	2373 university Ave	food/stormwater	2013/2014	3/29/2013
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2012/2013	2013/2014
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2013/2014	
Medium	PUBLIC STORAGE INC.	1961 E. BAYSHORE RD	storage	2013/2014	
Priority Level	**Facility Name**	**Facility address**	**Type of Business**	**Year of Inspection**	**Last Inspection**
Medium	RE Bormann's Steel C	2450 Pulgas Ave	Industrial	2013/2014	June 25,2012
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2013/2014	
Medium	SPORT AUTHORITY	1775 EAST BAYSHORE RD	retail	2013/2014	
Low	MONTEREY APARTMENTS	1838 W. BAYSHORE STREET	apartments	tbd	
Low	COLONIAL APARTMENTS	1483 VIA CONTENTA CT.	apartments	tbd	
Low	EUCLID AVENUE APARTMENTS	1910-1950 EUCLID AVE	apartments	tbd	
Low	LEITRIM HOUSE APARTMENTS	275 EAST O'KEEFE STREET	apartments	tbd	
Low	WOODLAND ARMS APARTMENTS	1717 WOODLAND AVE	apartments	tbd	
Low	PARK APARTMENTS	280 EAST O'KEEFE STREET #D	apartments	tbd	
Low	RUNNYMEDE GARDENS	2301 COOLEY AVENUE	apartments	tbd	
Low	TRADEWINDS APARTMENTS	C/O BRUCE SWENSON	apartments	tbd	

C.4.b.iii.(2) ►Facilities Scheduled for Inspection San Mateo County Environmental Health Proposed Inspections in EPA for FY 13/14

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

Priority Level	Facility Name	Address	Business Category
Med	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive
Med	ACE FIRE EQUIPMENT & SVC CO INC	1870 BAYSHORE	industrial
Med	AUTOZONE #3302	2160 UNIVERSITY AVE	hazmat
Med	Carlos Auto	350 Demeter St #4B	automotive
Med	CARNICERIA RODRIGUEZ	2398 UNIVERSITY AVENUE	food
Med	CASE FURNITURE	2526 PULGAS AVENUE	hazmat
Med	Catered Too	325 Demeter Street	food
Med	CAVALLINO RAMPANTE LTD. (DBA)	1880 W BAYSHORE ROAD	industrial
High	CEO STEEL FABRICATION, INC	2530 PULGAS AVENUE	hazmat
Med	CESAR CHAVEZ ACADEMY	2350 RALMAR	food
Med	COSTANO ELEMENTARY SCHOOL	2695 FORDHAM	food
Med	E PALO ALTO SHELL	2194 UNIVERSITY	hazmat
Med	EL SABOR MICHOCANO	2398 UNIVERSITY	food
High	EPA CORP YARD	150 Tara road	hazmat
Med	EPA Fish 'n Chicken	2150 University Ave	food

Priority Level	Facility Name	Address	Business Category
Med	Four Seasons Hotel	2050 University Ave	food
Med	GARDEN SUPER MARKET	1933 PULGAS AVENUE	food
Med	HOME DEPOT #6603	1781 EAST BAYSHORE ROAD	nursery
High	INFINITY SALVAGE	2091 BAY ROAD	automotive
Med	Izzy's Brooklyn Bagels	2220 B University Ave	food
Med	J.D.P. RECYCLING	2535 PULGAS AVE	recycling
Med	C.S. TRUCKING	2535 PULGAS AVENUE	automotive
Med	JUST LUNCH	1950 UNIVERSITY	food
Med	LA ESTRELLITA MARKET	2387 UNIVERSITY AVENUE	food
Med	LA TIENDITA SUPERMARKET	510 O'CONNOR STREET	food
Med	LAS ADELITA'S RESTAURANT	2373 UNIVERSITY AVENUE	food
Med	LEE'S BACKHOE SERVICE	1800 BAY ROAD	automotive
Med	LLANOS AUTO REPAIR	1849 BAY Road	automotive
Med	LOS ROBLES MAGNET ACADEMY	2450 RALMAR	food
Med	NEWBRIDGE MARKET	922 NEWBRIDGE STREET	food
Med	OAKWOOD MARKET	2106 OAKWOOD DRIVE	food
Med	OCEANNA CAFE	1781 BAYSHORE	food
Med	ONE STOP MARKET	1493 EAST	food

		BAYSHORE ROAD	
Priority Level	**Facility Name**	**Address**	**Business Category**
Med	OUR COMMON GROUND, INC.	2560 PULGAS AVE	nursery
Med	PAL MARKET, INC.	2398 UNIVERSITY AVENUE	food
High	PITCHER DRILLING	218 DEMETER STREET	industrial
Med	SF SOUP CO	2050 University Ave	food
Med	STARBUCKS COFFEE CO 5977	1765 E BAYSHORE ROAD	food
Med	TACO BELL PIZZA HUT EXPRESS	1701 EAST BAYSHORE ROAD STORE#20635	food
Med	Taqueria La Cazuela	2386 Clarke Ave	food
Med	Taqueria Los Temos	1491 East Bayshore Road	food
Med	THREE BROTHERS TACOS	2220 UNIVERSITY AVENUE	food
Med	THREE BROTHERS TACO'S TRUCK #2	2220 UNIVERSITY AVENUE	food
High	TORRES PRINTEX	1175 WEEKS	Light industrial
Med	TOU BAR EQUIPMENT COMPANY INC.	2535 PULGAS AVENUE	automotive
Med	Touchatt Trucking	2535 PULGAS	automotive

C.4.b.iii.(2) ►Facilities Scheduled for Inspection East Palo Alto Environmental Health Proposed Inspections for FY 13/14

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

Priority Level	Facility Name	Facility address	Type of Business	Year of Inspection	Last Inspection
HIGH	El Jarocho	2393 University Ave	food/stormwater	2013/2014	3/29/2012
High	A'S TOWING	1885 BAY ROAD	automotive	2013/2014	11/7/2012
High	Alfredo's carpet cleaners	831 Weeks st	Painting	2013/2014	5/31/2012
High	Bridge Property Management	1969 Tate Street	residential high density apartments	2013/2014	4/2/2013
High	CS Trucking	2535 Pulgas Ave	trucking	2013/2014	10/3/2012
HIGH	Firehouse Grill	1765 E. Bayshore Rd	food (stormwater issues)	2013/2014	4/8/2013
High	La Estrellita	2387 University Ave	food/stormwater	2013/2014	07/20/12, 3/29/2013,
High	Light Tree Apartments	1805 E. Bayshore Rd	apartments	2013/2014	7/15/2013
High	Menlo Food Corp	175 Demeter	Referred CEH	2013/2014	6/20/2012
High	Mi Pueblo	1731 E. Bayshore	food/stormwater	2013/2014	5/14/2012
High	Mikes Trucking	2527 Hazelwood Wy	automotive	2013/2014	03/14/2012,
High	Palo Alto Concrete	1923 Pulgas	construction	2013/2014	10/8/2012, 10/14/2012
High	Rainer's Service Station	1905 East Bayshore Road	tires	2013/2014	5/31/2012
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2013/2014	11/30/2012
High	SPECIALTY TOWING AND RECOVERY INC	2666 MIDDLEFIELD RD #B	towing	2013/2014	10/2/2012

Priority Level	Facility Name	Facility address	Type of Business	Year of Inspection	Last Inspection
High	Starbucks	1745 E Bayshore	food (stormwater issues)	2013/2014	5/16/2013
HIGH	SUNRISE ENTERPRISE 87, INC	264 TARA ST	towing	2013/2014	6/20/2012, 10/02/2012
HIGH	Toubar Equipment, CS Trucking, JDP recycling	2535 Pulgas Ave	automotive	2013/2014	6/5/2012
HIGH	WOODLAND ARMS APARTMENTS EQR	466 O'Keefe mike Riley 566-2013	residential high density apartments	2013/2014	5/28/2013
HIGH	Winston Taylor Concrete	1195 Garden	construction	2013/2014	10/03/2012
High	Oasis Painting	2374 Palo Verde Ave	HOME BASED BUSINESS	2013/2014	5/24/2012
Medium	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive	2013/2014	6/5/2012
Medium	A-1 Auto	2526 PULGAS	automotive, towing	2013/2014	6/5/2012
Medium	Ana's Party Store	910 Newbridge St	retail	2013/2014	
Medium	ARTEAGA AUTO CLEANING AND DETALLING	867 Weeks St	mobile auto	2013/2014	
Medium	Carlos Auto	350 Demeter	automotive	2013/2014	1/29/2013

Priority Level	Facility Name	Facility address	Type of Business	Year of Inspection	Last Inspection
Medium	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2013/2014	Prior to Oct 1, 2013
Medium	Global Steel	255 Demeter	Industrial	2013/2014	11/30/2012
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	possible 2013/2014 new location	5/31/2012
Medium	JAT TRUCK #1	1244 LAUREL AVENUE	mobile auto	2013/2014	
Medium	JBR Taxi Cab	1885 East Bayshore Road #99	automotive	2013/2014	
Medium	LA FAMILIA DISCOUNT	1803 BAY ROAD	retail	2013/2014	
Medium	Las Aldelitas	2373 university Ave	food/stormwater	2013/2014	3/29/2013
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2012/2013	2013/2014
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2013/2014	
Medium	PUBLIC STORAGE INC.	1961 E. BAYSHORE RD	storage	2013/2014	
Medium	RE Bormann's Steel C	2450 Pulgas Ave	Industrial	2013/2014	June 25,2012
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2013/2014	
Medium	SPORT AUTHORITY	1775 EAST BAYSHORE RD	retail	2013/2014	

C.4.c.iii.(1) ►Facility Inspections—County Environmental Health Conducted Inspections

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

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

	Number	Percent
Number of businesses inspected	19	
Total number of inspections conducted	23	
Number of violations (excluding verbal warnings)	0	
Sites inspected in violation	0	0%
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	0	0%

Comments:

The City has an ongoing Memorandum of Understanding with SMCEH to conduct health/food and hazardous waste facility inspections of East Palo Alto businesses. The SMCEH utilizes the City's ERP when necessary for stormwater violations, but typically relies on health/food and hazardous waste authority to gain compliance, for related actions.

1) All violations from a single site for a particular incident are reported as one violation.

2) County Environmental Health (CEH): Food and Haz Mat program inspectors conduct routine Stormwater inspections at inventoried sites based on High, Medium, and Low priorities. If a violation or discharge is observed, a description of the violation is noted on the Inspection Report form, including comments and/or requirements that the facility must complete to clear the violation. If the violation is not cleared at the time of the inspection, a copy of the Inspection Report form is given to a stormwater technician for follow up.

All violations were resolved within the recommended 10 day follow up period.

C.4.c.iii.(1) ►Facility Inspections—EPA Environmental Health Conducted Inspections

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

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

	Number	Percent
Number of businesses inspected	31	
Total number of inspections conducted	45	
Number of violations (excluding verbal warnings)	8	
Sites inspected in violation	8	26%
Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner	8	100%

Comments:

The City's has reported as follows:

1) **Sites with more than one violation are counted as a single violation**
2) **Stormwater inspections became more frequently based on complaints as business owners and residents become more aware of stormwater protections. While the County did not report finding many actual discharges, this is likely due to the City responding to local complaints.**
3) **The City will conduct annual follow-up inspections for businesses that have been reported by the City as out of compliance during FY 12/13 until the business has not had any further violations.**
4) **All violations were resolved within the recommended 10 day follow up period, or as a rare exception, provided with additional time to remedy large issues of site housekeeping, when it has been determined that stormwater impairment is unlikely to occur.**

C.4.c.iii.(2) ►Frequency and Types/Categories of Violations Observed-- EPA Environmental Health Conducted Inspections

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)	8
Potential discharge and other	11

Comments: **Eight actual discharges were identified (with pollutants having reached the gutter/street or SDI) during FY 13/14, all were resolved in an immediate manner, and included escalated enforcement to ensure immediate compliance.**

C.4.c.iii.(2) ►Frequency and Type of Enforcement Conducted — EPA Environmental Health Conducted Inspections

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

	Enforcement Action (as listed in ERP)[48]	Number of Enforcement Actions Taken	% of Enforcement Actions Taken[49]
Level 1	Verbal Warning/Written Notice—Return to Compliance Notice Issued	11	58%
Level 2	Warning Notice of Violation	5	26%
Level 3	Notice to Comply, Compliance meeting, Compliance Agreement, and or Stop Work Orders	3	16%
Level 4	Administrative Order/ Order of Determination/ Legal Action	0	0%
Total		19	100%

C.4.c.iii.(3) ►Types of Violations Noted by Business Category— EPA Environmental Health Conducted Inspections

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

Business Category[50]	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Automotive	0	6
Mobile Business/Home Based	2	2
Light Industrial	1	1
Food/health/Restaurant or Market	2	1
Apartment Complex (or their contractor)	2	0
Nursery	0	1
Ranch	1	0
Total	8	11

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

C.4.c.iii.(4) ►Non-Filers

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

No Businesses were identified as non-filers, although several were referred to County environmental Health to obtain permit coverage for food/haz waste.

C.4.d.iii ►Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Illicit Discharge Inspection Workshop	April 24, 2013	Regulatory refresher, mobile cleaning of parking garages, table top exercise for illicit discharge scenarios	2	100%

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

Program Highlights

Provide background information, highlights, trends, etc.

During FY 12/13, the city of East palo Alto enhanced the Illicit Discharge Detection & Elimination program through the following efforts:

1) **Implementation of the EPA collection system screening program; 2) participation in the Commercial, Industrial and Illicit Discharge (CII) Subcommittee; and 3) participation or attendance at the SMCWPPP April 24th Illicit Discharge Inspector Training Workshop, and 4) continuation of the EPA Illegal Dumping Task Force, which included the installation of a camera at a local illegal dumping hot spot.**
2) **For further information, please see the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 12-13 Annual Report for a 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
Gloria Galindo	Illegal Dumping and Illicit Discharges—Right of Way	650-853-5916
Jerome Calubaquib	Code Enforcement--all	650-853-5942
Michelle Daher	Environmental Health Compliance	650-853-3197

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 City of EPA currently addresses mobile businesses at the point of business license application, by providing the applicant with an overview of the Partnership in Pride program, and educating businesses on BMPs for their particular business and including Partnership in Pride on the Business License itself, indicating the business is participating in the Clean City, Clean Bay Program.
the City also actively observes local businesses and responds to complaints/observations of illicit discharges or illegal dumping and requires the BMPs recommended by the BASMAA Mobile Surface Cleaners Program, etc.).
The City of EPA does not hire Mobile Surface Cleaners.

For further information, please see the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 12-13 Annual Report (if applicable) for a description of efforts by the Commercial, Industrial and Illicit Discharge (CII) Subcommittee and the BASMAA Municipal Operations Committee to address mobile businesses.

The mobile business requirements apply to all mobile businesses, not just the ones hired by the municipality. Be sure to demonstrate your

understanding by distinguishing between the two suggested topics above (i.e. internal municipal practices and service area outreach/enforcement).

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 City of East Palo Alto accepted ownership of the local stormdrain system in 2005. A comprehensive stormdrain analysis has not occurred since acceptance of the responsibility. During FY 12/13, the City has pursued updating the Stormwater Master Plan, which has included a complete investigation of the City's stormwater system, including videos and maps that indicate where the "hot spots" of debris located in the stormwater inlets and drain network are located. Furthermore, the City has a process of maintaining the stormdrain system following these priorities:**

1) **Maintenance of all full-trash capture devices**
2) **Maintenance of the City's Pump Station**
3) **Maintenance of any area that has been reported as a potential illicit discharge/illegal dumping within the system**
4) **Clean out of all spots identified as priorities in the Stormdrain Master Plan (according to budgetary constraints)**
5) **Follow Stormdrain Master Plan (when finalized)**
6) **Work with residential/business complaints and Code Enforcement to identify sites where illegal dumping has occurred; respond within 24 hours with debris removal**
7) **Provide outreach to the community about appropriate solid waste/hazardous waste disposal**

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))		
Discharges reaching storm drains and/or receiving waters (C.5.f.iii.(2))	2	
Discharges resolved in a timely manner (C.5.f.iii.(3))		100%

Comments:

Guidance: A majority of the spills/discharges are associated with illegal dumping, which the City has a robust program to address. Of all complaints, target issues include the illegal dumping of furniture such as mattresses and couches, of which the fire retardants (typically PBDE's) have been identified as a potential for stormwater impairment, and hazardous wastes such as tires, oil and paint (which are an obvious stormwater quality impairment issue). There were also issues of sanitary discharge where in one case, a resident had a sanitary line breakage that resulted in a direct discharge (and subsequent lien on the property for repair and cleanup), as well as an incident of a home-based business reportedly dumping the carpet cleaning waste into the stormdrain (which was unsubstantiated) Of actual discharges, many complaints of illicit discharge have been, upon inspection, associated with home-based businesses and reported as such (in section c.4). All illegal dumping/illicit discharge issues are to be resolved in a timely manner, and more optimistically, with a response time of 24 hours of initial observation/report.

C.5.f.iii.(4) ►Summary of major types of discharges and complaints	
Provide a narrative or attach a table and/or graph.	
Mattresses	216
Couches	155
Trash	95
Illegal Dumping of trash	91
Tires	45
Oil and/or Paint	7
Sanitary discharge	2
Other (Wood/wooden furniture)	85
Totals	**696**

Section 6 – Provision C.6 Construction Site Controls

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

Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (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 (include only High Priority Site and sites disturbing 1 acre or more) (C.6.e.iii.1.c)
#	#	#
8	**2**	**15**

Comments:

1) **Due to the sensitivity of San Francisquito Creek to sediment impairment, the City considers all grading and active construction sites as high priority during FY 12/13 and requiring inspections**
2) **Only on sites that either disturb more than one acre (regardless of compliance efforts required) or sites that are actively in construction and require documentation of verbal or written notices of necessary improvements and/or enforcement actions are reported here.**

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

- A majority of construction site inspections occurred for Capital Improvement Projects under City permit, by city contractors, with contractual obligations to meet CASQA standards for stormwater compliance
- During FY 12/13, no violations were found with construction inspections.
- A majority of verbal warnings were remedied at the time of inspection or within 24 hours, and prior to any illicit discharge.
- Instances of discharge into the Streets were remedied with street sweepers prior to a rain event through voluntary comliance.
- In one case, a water main broke during construction but the stormdrain system was adequately protected, resulting in no violations as the storm drain had been disconnected from the main system and the affected system was vactored out after the incident.

BMP Category	Number of Violations[51] excluding Verbal Warnings	% of Total Violations[52]
Erosion Control	0	0
Run-on and Run-off Control	0	0
Sediment Control	0	0
Active Treatment Systems	0	0
Good Site Management	0	0
Non Stormwater Management	1	100
Total[53]		100%

[51] Count one violation in a category for each site and inspection regardless of how many violations/problems occurred in the BMP category. For example, if during one inspection at a site, there are 2 erosion control violations, only 1 violation would be counted for this table.

[52] Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

[53] The total number of violations may count more than one violation per inspection, since some inspections may result in violations in more than one category. For example, during one inspection of a site, there may have been both an erosion control violation and a sediment control violation. For this reason, the total number of violations in this table may not match the total number of enforcement actions reported in Table C6.e.iii.1.e.

Permittee Name: City of East Palo Alto

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

- The City of East Palo Alto is 2.5 square miles in size, which makes it easy to work directly with construction site managers on a one-on-one basis from the time of permit application, on through to finalization of the project;
- Very few construction projects were active during FY 12/13;
- A majority of construction site inspections occurred for Capital Improvement Projects under City permit, by city contractors, with contractual obligations to meet CASQA standards for stormwater compliance;
- During FY 12/13, no violations were found with construction inspections;
- A majority of verbal warnings were remedied at the time of inspection or within 24 hours, and prior to any illicit discharge;
- Instances of discharge into the Streets were remedied with street sweepers prior to a rain event through voluntary compliance;
- In one case, a water main broke during construction but the stormdrain system was adequately protected, resulting in no violations as the storm drain had been disconnected from the main system and the affected system was vactored out after the incident;
- As such, no enforcement actions were required during FY 12/13.

	Enforcement Action (as listed in ERP)[54]	Number Enforcement Actions Issued	% Enforcement Actions Issued[55]
Level 1[56]	Verbal Warning/Written Notice—Return to Compliance Notice Issued	5	83
Level 2	Warning Notice of Violation	1	17
Level 3	Notice to Comply, Compliance meeting, Compliance Agreement, and or Stop Work Orders	0	0
Level 4	Administrative Order/ Order of Determination/ Legal Action	0	0
Total			100%

[54] Agencies should list the specific enforcement actions as defined in their ERPs.
[55] Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.
[56] For example, Enforcement Level 1 may be Verbal Warning.

C.6.e.iii.1.f, g ►Illicit Discharges

- Very few construction projects were active during FY 12/13
- A majority of construction site inspections occurred for Capital Improvement Projects under City permit, by city contractors, with contractual obligations to meet CASQA standards for stormwater compliance
- During FY 12/13, no violations were found with construction inspections.
- A majority of verbal warnings were remedied at the time of inspection or within 24 hours, and prior to any illicit discharge.
- Instances of discharge into the Streets were remedied with street sweepers prior to a rain event through voluntary compliance.
- In one case, a water main broke during construction but the stormdrain system was adequately protected, resulting in no violations as the storm drain had been disconnected from the main system and the affected system was vactored out after the incident.
- No Illicit Discharges occurred during FY 12/13

	Number
Number of illicit discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.f)	0
Number of sites with discharges, actual and those inferred through evidence at high priority sites and sites that disturb 1 acre or more of land (C.6.e.iii.1.g)	0

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

	Number	Percent
Violations (excluding verbal warnings) fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	N/A	%[57]
Violations (excluding verbal warnings) not fully corrected within 30 days after violations are discovered (C.6.e.iii.1.i)	N/A	%[58]
Total number of violations (excluding verbal warnings) for the reporting year[59]	N/A	100%

Comments:

- Very few construction projects were active during FY 12/13
- A majority of construction site inspections occurred for Capital Improvement Projects under City permit, by city contractors, with contractual obligations to meet CASQA standards for stormwater compliance
- During FY 12/13, no violations were found with construction inspections.
- A majority of verbal warnings were remedied at the time of inspection or within 24 hours, and prior to any illicit discharge with voluntary

[57] Calculated as number of violations fully corrected in a timely period after the violations are discovered divided by the total number of violations for the reporting year.
[58] Calculated as number of violations not fully corrected within 30 days after the violations are discovered divided by the total number of violations for the reporting year.
[59] The total number of violations reported in the table of Violation Correction Times equals the number of initial enforcement actions. I.e., This assumes one violation is issued for several problems during an inspection at a site. The total number of violations in the table of Violation Correction Times may 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.

compliance.

- Instances of discharge into the Streets were remedied with street sweepers prior to a rain event.
- In one case, a water main broke during construction but the stormdrain system was adequately protected, resulting in no violations as the storm drain had been disconnected from the main system and the affected system was vactored out after the incident.

No Violations occurred during FY 12/13

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: **The construction inspection data being reported this FY12/13 reveals that the City has a very active inspection team that is consistently checking on the various sites under construction, partnering with the site managers to ensure stormwater impairment does not occur. While this trend may be simply due to the reduced number of active construction sites, it is the hope of the East Palo Alto Construction Inspection team that we continue to see these trends of voluntary compliance with no stormwater quality impairments.**

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 evaluation of the EPA Construction Inspection program indicates that the program is very effective. With the increasing permits and plan reviews , it is assumed that FY13/14 will have a more robust inspection year than FY12/13 and may result in less complete compliance although the hope is that the City will be able to continue to work directly and partner closely with construction site managers to continue to receive full compliance with no violations.

C.6.f ►Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
SCMWPPP Stormwater Training for Construction Site Inspectors Workshop	April 11. 2013	BMPs, Construction General Permit	2	100%
In house weekly training meetings with construction inspector	Ongoing	As needed, CIP project inspection, private site inspection, construction inspection reporting, etc.	2	100%

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

C.7.a ►Storm Drain Inlet Marking (existing storm drains)

(For FY 12-13 Annual Report only) Report prior years' estimated annual percentages of municipality maintained storm drain inlet markings inspected and maintained as legible with a no dumping message or equivalent. At least 80% of municipality-maintained storm drain inlet markings shall be inspected and maintained at least once per 5-year permit term.

Summary:

The City had a significant stormdrain marking project in 2009/2010 to install "No dumping, drains to Bay" markings on 70% of the City's stormdrain system. Subsequently, the City installs 5% (or roughly 20-30) of the roughly 500 stormdrain inlet markings annually to comply with this requirement.

Estimated annual percentage of stenciled municipality storm drain inlets that were inspected and maintained as legible:

2009-10: 70%
2010-11: 5%_
2011-12: 5%
2012-13: 5%

C.7.a ►Storm Drain Inlet Marking (newly-constructed, privately-maintained streets)

(For FY 12-13 Annual Report only) Report prior years' annual number of projects accepted after inlet markings were verified. For newly-approved, privately-maintained streets, permittees shall require inlet marking by the project developer upon construction and maintenance of markings through the development maintenance entity. Markings shall be verified prior to acceptance of the project.

Summary:

Numbers of privately maintained new construction streets:

2009-10: 0 projects
2010-11: 0 projects
2011-12: 0 projects
2012-13: 0 projects

The City of East Palo Alto has approved plans for privately maintained streets for future construction. The City has conditions of approval that require all newly constructed stormdrains to be verified that markings have been installed and maintained. Prior to "occupancy", the project shall have these inlets verified as appropriately installed.

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:

The following separate report developed by BASMAA summarizes the activities of the Regional Youth Litter Campaign for which the City of East Palo Alto was an active member and hosted two Be the Street Litter events during FY 2012/13:

- **BASMAA Be the Street Youth Litter Campaign Report**
  - **May 24, 2013: Make your own reusable bag event**
  - **June 30, 2013: City's 30th Anniversary Event**

C.7.b.iii.1 ►Pre-Campaign Survey

(For the Annual Report following the pre-campaign 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:

The following separate report developed by BASMAA summarizes any pre-campaign survey conducted in FY 12-13:

- **BASMAA Be the Street Youth Litter Campaign Report**

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

	Survey report attached
X	**Reference to regional submittal:**

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:

The City of East Palo Alto provides ongoing outreach via email list serves and the City's Environmental Health Facebook page at https://www.facebook.com/pages/The-City-of-East-Palo-Alto-Community-Health-and-Environment/112259492170496?ref=hl

for a majority of all BASMAA and Flowstobay efforts that are reported on within this report.

The following separate report developed by BASMAA summarizes media relations efforts conducted regionally during FY 12-13:

• BASMAA Media Relations Final Report FY 12-13

This report and any other media relations efforts conducted countywide is included within the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report.

C.7.d ►Stormwater Point of Contact

Provide details of website or phone number used as the point of contact. Report on how the point of contact is publicized and maintained. If any change occurs in this contact, report in a subsequent Annual Report.

The City of East Palo Alto provides the SMCWPPP point of contact through the City's website, the Facebook account, and a door-to-door mailing for Household Hazardous Waste and Bulky Item Pickup delivered to each residential address. In addition, the SMCWPPP initial points of contact have not changed, however, social media points of contact have been established in addition to the original website and phone number. A summary of efforts conducted by SMCWPPP to publicize stormwater points of contact (e.g. program website, hotline, outreach materials, and social media, etc.) is included within the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report."SMCWPPP.

C.7.e ►Public Outreach Events

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed.

Use the following table for reporting and evaluating public outreach events .

The following outreach events were conducted on a countywide level by SMCWPPP and are described in detail in the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report:

- California Coastal Cleanup Day in San Mateo County, September 15, 2012, for which the City hosted their own sites.
- San Mateo County Fair, June 8-16, 2013, promoted by the City through a email list-serve and online on the City's facebook page as well as through the distribution of flyers throughout the community at the City's library, YMCA and City office buildings.

Event Details	**Description** (messages, audience)	Evaluation of Effectiveness
September 15, 2012: Coastal Cleanup Day	City Cleanup Event in conjunction with Santa Clara Valley Water District	○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal In addition to the volunteer cleanup efforts that were conducted by over 50 volunteers, the items listed above were available for residents

		to take with them. Residents enjoyed obtaining the information. The biggest success for encouraging EPA residents participation was having the local leaders at the event.
December 23, 2012 through January 4, 2012: City Emergency Flood Event	December 23, 2012, residents were flooded with the overtopping of a levy separating residents from the San Francisquito Creek. During the Cleanup, the City took the opportunity to distribute information about how to dispose of hazards waste, household trash, and other debris through a mass mailing and at the Corporation Yard as residents came to pick up sand bags.	○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal Over 100 residents came to pick up sandbags at the corporation yard and were provided with reusable bags that contained information on proper waste disposal as listed above.
April 24th 2013 Earth Day: Make your own reusable Bag Event	YMCA Earth Day Event: Make Your Own Reusable Bag and Be the Street Event	The City received over 1,000 new and used t-shirts to help the community make their own reusable shopping bag in preparation for the City's Reusable Bag Ordinance which will start October 2, 2013. About 25 volunteers and 25 participants come to the event and made their own reusable shopping bags. Additional outreach was provided at the two tabling events including information on: ○ Be the Street Event with photos send directly to the residents email and phone ○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal Partnership in Pride program, providing an opportunity for anonymous photos and tips for litterbugs
May 10, 2013: Bike to Work Day	Bike to work day support of local cyclists to encourage trip reductions and	This was a tabling event to support those who want to bike to work. Additional outreach was

		provided at the tabling event including information on: ○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal Partnership in Pride program, providing an opportunity for anonymous photos and tips for litterbugs
May 18, 2013: National Rivers Cleanup Day Event	Part of a National Cleanup effort, the Cit hosted several spots for cleanup including: Runnymede/Bay Trail, O'Connor Pump Station San Francisquito Creek (a joint cleanup effort with Santa Clara Valley Water District)	○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal In addition to the volunteer cleanup efforts that were conducted by over 80 volunteers, the items listed above were available for residents to take with them. The information was received eagerly by residents
May 25: City Parade Cleanup Event	Initiated by the City Council, this event was an on-land cleanup for the Partnership in Pride campaign	Over 80 volunteers attended and received information about proper waste disposal, while cleaning up the City of East Palo Alto ○ Distribution of free reusable bags ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal options This information was warmly received by many residents that did not know about these no-charge services
June 30, 2013: City's 30th Anniversary	Make your own Reusable Bag Event; Bag Monster; Be The Street Event (2) Outreach/Tabling Event s Recology solid waste tabling event	City staff and San Mateo County Environmental Health staff supported this event through 4tables at the City's 30th Anniversary where close to 1,000 residents came to celebrate. The City hosted a "Make Your Own Reusable Bag" Event, taking donated t-shirts and turning them

		into shopping bags in preparation of the City's implementation of the Reusable Bag Ordinance which stars October 2, 2013 The County supported with a Be the Street event and for which the Bag Monster made an appearance to take photos with guests at the celebration. These photos were posted online and linked to the City's Facebook Account; Additional outreach was provided at the two tabling events including information on: ○ Used Oil ○ Carwash ○ Hazardous waste disposal ○ Solid waste disposal ○ Partnership in Pride program, providing an opportunity for anonymous photos and tips for litterbugs This event was a huge success with many activities for all types of people, with chatter about Partnership in Pride for the City that's now 30 years old!

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:

The City has initiated a collaborative effort with Acterra Stewardsip, as well as with other local non-profit groups to encourage residents to participate in documenting the litter they are collecting in the City. The City also works with the San Francisquito Creek Joint Powers Authority to work with local volunteers to document local creek conditions. This year, photo documentation of spawning steelhead trout has greatly enhanced the awareness of the San Francisquito Creek as a resource to local fauna and flora as well as potentially as a future recreational resource—if the

steelhead trout come back in large enough numbers to fish!

The City also has encouraged local participation in the Litterati twitter app which encourages residents to take photos of the trash they pick up.

A summary of efforts conducted by SMCWPPP to work with Watershed Stewardship Groups on a countywide level is included within the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report

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.

The following involvement events were conducted on a countywide level by SMCWPPP and are described in detail in the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report:

- **California Coastal Cleanup Day in San Mateo County, September 15, 2012**

The City promoted this event by distribution of outreach through local media and by hosting several sites on the day of the event.

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: •
May 25: City Parade Cleanup Event	**Initiated by the City Council, this event was an on-land cleanup for the Partnership in Pride campaign** **Over 80 volunteers attended and received information about proper waste disposal, while cleaning up the City of East Palo Alto** ○ **Distribution of free reusable bags** ○ **Used Oil** ○ **Carwash**	**80 volunteers turned out for this City Council initiated cleanup event. A first of it's kind for the City, there is an interest in creating an annual on-land cleanup event.** **Over 2 cubic yards of litter was collected** **Over 0.5 cubic yards of recycling was collected.** **The litter collected was characterized according to sources and type.**

	○ Hazardous waste disposal ○ Solid waste disposal options	
April 24th 2013 Earth Day: Make your own reusable Bag Event	YMCA Earth Day Event: Make Your Own Reusable Bag and Be the Street Event	25 volunteers and 25 participants came out to make reusable bags out of donated t-shirts. This is a first-of-it's kind outreach event that involved students and teachers, City council members and families. In all, over 300 reusable shopping bags were made for distribution at the City's 30th Anniversary Event on June 30th, 2013. In addition, over 700 t-shirts were "prepped" to enable residents to "make their own bags" at the City Anniversary celebration. Of the 1,000 reusable shopping bags prepped at this event, 800 bags were given away at the City anniversary—by very grateful and eager residents who loved the idea of knowing they can just take an old t-shirt and turn it into a shopping bag. The remaining 200 shopping bags will be distributed during the FY13/14.
PAL Cleanup	Citywide on-land cleanup and graffiti removal program with Menlo-Atherton High School Football students and police department	• 25 students and 10 adults from Menlo Atherton High School Football team, 2 Home Depot employees, and two Police Department staff supported litter abatement and graffiti removal project in conjunction with Home Depot (who supplied paint and buckets and other equipment) • Removed 4 cubic yards of litter and illegal dumping • Abated 14 sites of litter accumulation, largely wind blown, but also furniture and other bulky items
September 15, 2012: Coastal Cleanup Day	City Cleanup Event in conjunction with Santa Clara Valley Water District	• 35 participants at location #1 and 45 participants at other (on land) locations. Significant increase in local residential participation over previous years. • 1.25 miles of creek cleaned • Quantity of trash: 810 gallons or 150 pounds (most removed from on-land cleanups) • 24 gallons or 20 pounds recyclables collected. The data collected in previous years was reported in a substantially different manner than presently being done, moving away from "very rough estimates" toward tightening the numbers to a more realistic estimate, including a characterization of litter sources and types.

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.

SMCWPPP conducted two school-aged children outeach programs countywide. These programs are summarized in the Public Information and Outreach section of the SMCWPPP FY 12-13 Annual Report

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.
Make Your Own Reusable Bag Event	**Worked with Youth Community Services and Library to enable youth to make their own reusable bags—many made additional bags for City distribution.**	**10 teachers and 150 students participated in this effort**	**The Students were excited and engaged in the activity and brought the bags they made home where they educated their parents on the need to make their own bags or bring their own bags to the store. When they found out the City was going to be providing these bags to the community, over 70 students made extra bags to donate for the effort. Very successful campaign. No evaluation summary was provided. Over 25 of the students who participated in this effort returned to volunteer for the Earth Day effort listed above.**
Banana Slug String Band	**Willow Oaks School**	**400 students + 20 staff members**	**Banana Slug String Band playing music and songs to encourage students to be watershed protectors. Students were engaged and excited about the messages.**
Environmental Science in East Palo Alto	**Menlo Atherton High School Environmental Science Club**	**20+ students**	**Worked with high school students interested in Environmental Science to provide an overview of the various Environmental Science programs going on in the City of East Palo Alto and how they**

			can become involved. Feedback was direct and positive—many students have subsequently returned to help by auditing the City's shuttle program, volunteer at local cleanup events and participated in the Make Your Own reusable Bag events.
Microbes in Sewage	In a laboratory setting, students practice their microscope skills as they observe, document and identify microbes from water samples drawn from the aeration basin as part of the wastewater treatment process. This program directly relates since students study protist in the 7th grade as part of the science biology curriculum, Students also learn to understand the sense of place and the role of a wastewater treatment plant in their community. Impact of pollution on the Baylands and water environment, as well as prevention solutions that the students can currently engage in are discussed	4 classes, 160 students	See Palo Alto Water Quality Control Plant Annual Report for this information.

C.7.i. ►Outreach to Municipal Officials

(For FY 12-13 Annual Report only) Summarize outreach conducted to increase the overall awareness of stormwater and/or watershed messages among municipal officials.

Summary:

NPDES overview and ongoing Staff Reports to the City Council have included quarterly reports through the City Manager summarizing staff efforts, continuous feedback at local cleanup and outreach events, and by telephone when council members have additional questions. Additional outreach is provided the Planning Commission and the Public Works and Transportation Committee when important changes are made to the Clean City, Clean Bay Program, or the Partnership in Pride Campaign. In addition, an Annual Report is provided to the City Council as follows

- **June 2013: Stormwater Annual Report requesting annual NPDES Fee Collection**

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

During FY 12-13, we contributed through SMCWPPP 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. Monitoring efforts and results are documented in a separate report submitted March 15 of each year, as required in Provision C.8. For additional information on monitoring activities conducted by SMCWPPP, BASMAA RMC and the RMP, see the C.8 Water Quality Monitoring section of the SMCWPPP FY 12-13 Annual Report.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.b ►Implement IPM Policy or Ordinance

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

Trends in Quantities and Types of Pesticides Used[60]

The City did not require usage reports for FY 09/10, and this predates both the Clean City, Clean Bay Program as well as the contractors reporting history.

In reviewing usage trends, the City is working with the contractor to determine what is at the core of the varying usage totals. Initial discussion reveal a likely improper reporting from FY11/12 resulting in confusion about dilutions. This employee has since been retrained. The management for this employee has since left the company.

If one excludes the 11/12 data, due to questionable sourcing, the trending for usage is increasing, rather than decreasing (at least for Tempo Ultra (the only product with comparable usage reports). The City has plans to work more closely with the contractor to determine why these usage trends are moving in an undesirable direction. A new manager for the pest control company has begun his position working with staff and intends to assist the City with a more comprehensive plan on IPM.

Pesticide Category and Specific Pesticide Used	Amount[61]				
	FY 09-10	FY 10-11	FY 11-12	FY 12-13	FY 13-14
Organophosphates	Data unavailable				
Phantom EPA Reg #241-392 (ounces)	Data unavailable	**868**	None Applied	None Applied	
Cy-Kick CS 0.05% (ounces)	Data unavailable		**1585**	**2489**	
Pyrethroids	Data unavailable	None Applied	None Applied	None Applied	
Tempo Ultra EPA Reg #431-1363 (ounces)	Data	**2396**	**1235**	**2713**	

[60] Includes all municipal structural and landscape pesticide usage by employees and contractors.
[61] Weight or volume of the product or preferably its active ingredient, using same units for the product each year. The active ingredients in any pesticide are listed on the label. The list of active ingredients that need to be reported in the pyrethroids class includes: allethrin (D-allethrin), bioallethrin, bifenthrin, beta-cyfluthrin, cyfluthrin, cypermethrin, cyphenothrin, deltamethrin, esfenvalerate, etofenprox, gamma-cyhalothrin, imiprothrin, lambda-cyhalothrin, metofluthrin, permethrin, phenothrin, prallethrin, resmethrin, sumithrin (D-phenothrin), tau fluvalinate, tefluthrin, tetramethrin, tralomethrin, and zeta-cypermethrin (S-cypermethrin).

	unavailable				
Product or Pesticide Type Y	Data unavailable	None Applied	None Applied	None Applied	
Carbaryl	Data unavailable	None Applied	None Applied	None Applied	
Fipronil	Data unavailable	None Applied	None Applied	None Applied	

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.	
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years. **List of attendees at the 11-09-11 Structural IPM Training Workshop (City contracts out structural pest control to Terminix)……** **List of attendees at the 02-28-12 Landscape IPM Training Workshop……..** **List of attendees at the 02-27-13 Landscape IPM Training Workshop……..**	**0** **4** **3**
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%**

Permittee Name: City of East Palo Alto

C.9.d ►Require Contractors to Implement IPM

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

If yes, attach one of the following:

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

The City of East Palo Alto verifies IPM contractor performance by hiring professionals that certify they are properly trained and use IPM.

Terminix, East Palo Alto's Green Pro Certified structural pest control company is listed on the Green Pro Website http://www.certifiedgreenpro.org/commitment.asp. Green Pro Certification attached is different from Quality Pro Green in that the Green Pro Certification ensures technicians are trained and only make traditional pesticide applications after discussing the options with the City and getting staff consent from the Maintenance Manager.

If **Not attached**, explain:

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 12-13, we participated in regulatory processes related to pesticides through contributions to SMCWPPP, BASMAA and CASQA. For additional information, see the Regional Pollutants of Concern Report submitted by BASMAA on behalf of all MRP Permittees and included as an appendix to the SMCWPPP Annual Report.

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?	X	Yes		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.

City staff members identified lack of appropriate staff training in pesticide applications and obtained training to ensure proper applications and labeling during FY 12/13. Two staff members were trained by the County Ag Commissioners office and the Corporation Yard was inspected to ensure compliance. City staff are documenting their use of Round-up Pro Max, the sole application of pesticide that municipal staff use.

C.9.g. ►Evaluate Implementation of Source Control Actions Relating to pesticides

(For FY 12-13 Annual Report only) Submit a report that evaluates; 1) the effectiveness of control measures implemented, and 2) attainment of pesticide concentration and toxicity targets for water and sediment from monitoring data (Provision C.8.). If needed, the report should include the following:

- Improvements to existing control measures and/or additional control measures required.
- A plan to implement improved and/or new control measures.

Summary:

The Effectiveness Evaluation Report is included in Section C.9 Pesticides Toxicity Control of the SMCWPPP FY 12-13 Annual Report

Since the initiation of the Clean City, Clean Bay Program in October 2011, the City has conducted the following to ensure our agency's IPM Program has the appropriate source control measures:

- **Adopting IPM Policy/Ordinance**
- **Municipal Staff Training (100% of the City's applicators are now trained in IPM and Pesticide Application standards for Roundup Pro Max)**
- **Requiring Contractors to Implement IPM**
- **Requiring New Development and Redevelopment Projects to Minimize Pesticide Use and use drought tolerant plants, which will reduce the incidence of irrigation related runoff.**

The City will further ensure that contractors are continually implementing IPM by working with a new Terminix management contact to have an introduction meeting where we will discuss expectations of the contractor and Environmental staff wherein quarterly, the Pest Control company will work with City staff to review pest control practices as well as to review invoices for those products used in the City, to ensure that our contractor continually seeks to reduce the amount of pesticides used at City properties and right of way.

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:

On at least two occasions, City staff has witnessed local Home Depot staff informing customers of less-toxic pesticide alternatives for their pest control needs. Through this anonymous observation, staff has also witnessed a positive response by the customer who did not realize that there would be "toxic" products on the shelf o the store and immediately selected less toxic products after being provided with this information by the store representative. The customers appear to be surprised that it's legal to sell toxic products over the counter.

The following reports developed by SMCWPPP and BASMAA summarize point of purchase outreach efforts on a countywide and regional level:

- **SMCWPPP FY 12-13 Annual Report, Public Information and Outreach section**
- **BASMAA FY 12-13 "Our Water Our World" report**

C.9.h.iv ►Pest Control Contracting Outreach

(For FY 12-13 Annual Report only) Document effectiveness of outreach to residents who use or contract for structural or landscape pest control **OR** reference a regional that summarizes these actions.

Summary:

The following information is distributed directly by our agency

- **Providing targeted information to residents pertaining to ants, fleas and wasps (typically the pests that are largely concerning residents of East Palo Alto), which is well received information by the residents who do not seem to realize that there are products on the market that may be unsafe or toxic**
- **IPM messages in general outreach at local events—specifically the Got Ants? Outreach piece—residents enjoy this piece, and are looking particularly forward to a Spanish translation**
- **Outreach to residents about OWOW—residents enjoy the OWOW materials and like the logo which is easily recognizable and language barriers do not affect the message.**
- **Outreach to Residents about certified IPM contractors—The City has a list of certified IPM contractors, but largely do not utilize contractors for these services as they tend to self-apply for their pest control issues.**
- **Coordination with Household Hazardous Waste programs to promote appropriate pesticide disposal: The City works with local services to provide residential door-to-door pick-up for residents and has recently worked with Rethink Waste to create a new outreach piece which was designed for simple and quick reference to these services. All residents are expected to have been reached with this message.**

Efforts to conduct outreach at the countywide level related to pest control contracting are summarized in the SMCWPPP FY 12-13 Annual Report, C.9 Pesticides Toxicity Control section.

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:

During business inspections and at the counter when pesticide applicators and landscapers are coming in to obtain a business license, City staff discuss options and methods as well as training options for reducing toxic pesticide use. In addition, efforts to conduct outreach at the countywide level to pest control operators to reduce pesticide use are summarized in the SMCWPPP FY 12-13 Annual Report, C.9 Pesticides Toxicity Control section.

Response to Water Board Staff Comments on Section 9, Provision C.9, of FY 11-12 Annual Report

Use this area to respond to any Water Board staff comments on Section 9 of your FY 11-12 Annual Report, and refer to any required submittals that are attached.

Section 10 - Provision C.10 Trash Load Reduction

C.10.a.iii ►Minimum Full Trash Capture (Summary of Actions)

Provide the following:

1) Descriptions of actions/tasks initiated, conducted or completed in implementing Minimum Full Trash Capture Devices (due July 1, 2014), including numbers of devices, device types and total land area treated to-date by full capture devices;
2) Descriptions of planned actions/tasks and time schedules for completion;
3) A map that includes locations of all full capture devices installed (private and public) to-date and associated treatment areas, trash generation rates/areas, creek/shoreline trash hot spots, and trash management areas defined to-date.
4) A summary of maintenance activities implemented for each device or groups of devices, including descriptions of typical maintenance frequencies and issues associated with maintaining these devices.

C.10.a.iii ►Minimum Full Trash Capture (List of Devices)

Provide a list of trash full capture devices installed to-date or planned for installation by July 1, 2014 and the land area treated by each device or group of devices.

Applicable Trash Management Area (Preliminary Map ID)	Device Type	Planned or Installed	Maintenance Frequency	Total Number Installed	Total Area Treated (acres)
1	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	2	0.60
2	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	4	5.26
4	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	2	2.50
5	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	21	33.76
6	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	6	19.41[62]
7	Connector Pipe Screen	Installed	After rainy season (May) and prior to rainy season (October)	3	2.13
			Totals	38	63.66

[62] Includes a total of 8.48 acres in the City of Menlo Park TMA #9

Descriptions of Actions/Tasks (Conducted or Planned):

- The City has participated in the ABAG Full Trash Capture Grant project, both Phase I (the initial contract) and Phase II (the follow-up wherein additional units were purchased to fully utilize grant funding. During the first phase, 39 trash capture devices were installed through BioClean in November 2011. Of these, three units needed to be removed during the first rainy season due to flooding issues as they were installed in areas that were prone to leave litter collection and high litter accumulation.
- During the second phase, an additional 6 Kristar trash basket devices were installed on the western side of town in a high density residential neighborhood, near a local market; an area also frequented by pedestrians and public transportation riders. A total of 42 full trash capture devices remain installed and the units that were removed are located in the City's corporation yard awaiting identification of appropriate sites. Most likely these units will be installed during Spring 2014.
- A map that clearly illustrates the locations of devices installed is included, illustrating the land area treated by each device.
- On a separate map, the location of very high, high, medium and low trash generating areas, as defined in trash management areas identified to-date during the development of the City's long-term plans, and other features (e.g., water bodies, streets, etc.) to provide context to the device locations and stormwater trash management in this municipality. The City's trash hot spot has also been identified along San Francisquito Creek.

Descriptions of Maintenance Activities:

- The City of East Palo Alto is working with SMCWPPP to prepare SOPs for maintenance of full trash capture devices. Presently, the City maintains the devices twice a year, by vactoring out debris with the City owned vactor truck. The amount of debris will be estimated by the technician, typically based on percentage of the stormdrain inlet filled (0%, 10%, 25%, 50% or 100%).
- Maintenance records are written down on a maintenance log and provided to the Environmental Coordinator for Annual Report data.
- These records are kept in the City's NPDES digital files for the Fiscal Year when the maintenance occurred.
- During December 2012, the City of East Palo Alto experienced an estimated 10-15 year flood event along San Francisquito Creek, including an overtopping of the bank in several locations, causing damage to the creek bank, local roadways, and resulted in residential flooding requiring some mandatory evacuations. After this flood event, the full trash capture devices were inspected and significant debris was found located in the inlets where the full trash capture devices were installed..
- An initial cleanout removed an average of 6 cubic feet of floatable trash per unit, but the base of the inlets and screens of the units were notably clogged and caked with mud.
- A large-scale cleanout was required for all stormdrain inlet devices, resulting in an average of 1 cubic yard of material being removed from each of the units—a mix of power washing water and debris/mud/sludge was removed from the stormdrain system during this process. Of the material removed, roughly 1/6th of the material was trash, or roughly 1/6th of a

cubic yard. The remainder of the material was suspended sediment in well water. All material was transported via Vactor Truck to the Maintenance Yard where the debris was placed into a debris bin, with runoff flowing to the sanitary sewer connection. Due to the large volume of water that was used to release the debris, estimating volumes of trash was challenging.

C.10.b.iii ►Trash Hot Spot Assessment

Provide the 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. Additionally, include a map that identifies the location(s) of trash hot spots.

Trash Hot Spot	Cleanup Date	FY 2012-13 Volume of Trash Removed (cubic yards)	FY 2011-12 Volume of Trash Removed (cubic yards)	FY 2010-11 Volume of Trash Removed (cubic yards)	Dominant Type(s) of Trash	Trash Sources (where possible)
EPA01	9/15/2012	1.59	3.525	9.675	Convenience/Fast Food items, Paper and cardboard, Bottles (plastic or glass), Aluminum cans, Styrofoam, Toxic substances, Bags of trash, Furniture, Shopping carts, Bicycles, Scrap metal	Litter, Illegal dumping, Homeless encampments, Trash accumulation

C.10.c ►Long-Term Trash Load Reduction Plan

Provide descriptions of the progress made to-date on the development of Long-term Trash Load Reduction Plans due to the Water Board by February 1, 2014.

Long-Term Plan Task	Summary of Progress
1. Identifying and mapping trash generating areas	**The City has been revising loading rates of trash for very high, high, medium and low trash generating areas. Largely in East Palo Alto, the trash loading rates are inconsistent with those associated with similar land uses and population metrics as the population density tends to be higher than the associated land uses. In addition, public information and outreach has been largely ineffective as it has primarily been provided in English. The results of the field verification activities conducted to-date reveal a much higher trash loading rate. As such, maps have been updated to reflect these findings. As these field observations are not yet complete, the City anticipates that the current fiscal year will prove a more solid understanding of the trash issues facing the City of East Palo Alto, with the goal of completing the "final" map prior to the Long Term Trash Load Reduction Plan, due to the Water Board. Presently, there are seven trash generation areas depicted on the City's attached map(s) section C.10.a.iii.**
2. Identifying trash sources (as necessary or feasible) to assist in selecting trash management actions	**The City of East Palo Alto intends to implement a more rigorous enforcement of insufficient trash service as well as illegal dumping in the near future. This will include assistance with the County Environmental Health Department's Hazardous Waste Program, and shall incorporate the use of surveillance equipment as well as the inclusion of the District Attorney, when necessary to obtain appropriate legal actions to ensure full enforcement.**
3. Prioritizing trash generating areas and associated types of trash problems	**The city has identified residential areas throughout a significant portion of the city that are prioritized based on density of trash issues. For instance, a majority of single family homes have significant parking issues and overflowing refuse bins, which cause a high priority for litter and trash abatement as the typical tools utilized to control trash are unavailable such as street sweepers. As such, these areas are of highest priority to resolve and will require the implementation of street sweeping signage and enhanced enforcement for overflowing refuse bins to get control over.**
4. Identifying and selecting trash management actions for specific management areas	**As listed above, the City has identified areas where the management areas will coincide with specific management actions to remedy the source of the litter. In addition to these steps, the City will also work with the local retailers to assist in the Partnership in Pride program, during a litter assessment event, to sort litter and determine the sources, while looking to the retailers for guidance on resolution of the single use packaging sourced from local retailers and fast food chains.**

5. Defining the type of assessment(s) that will be used to demonstrate progress towards goals	**The City/County of East Palo alto is currently exploring a number of assessment methods that will assist the City in demonstrating progress towards solving municipal stormwater-related trash problems within our jurisdictional area. Through our participation in SMCWPPP, we are currently developing a countywide pilot trash assessment strategy and work plan. The pilot strategy will address the need to demonstrate progress in the near-term, while recognizing the fact that method development and testing is needed to achieve confidence in conclusions about trash reduction. The pilot strategy may include the testing of a number of trash assessment methods, including** • **Visual assessments of trash conditions on-land;** • **Trash full capture device operation/maintenance verification;** • **Condition assessments in receiving waters; and,** • **Documenting and assessing control measure implementation.** **The pilot strategy will be included as a supplement to our Long-Term Trash Load Reduction Plan, which will be submitted to the Water Board by February 1, 2014. The City/County may also choose to supplement the pilot strategy with City/County specific assessment strategies. The pilot strategy will be implemented in coordination with the three-year Tracking California's Trash grant-funded project, which was awarded to BASMAA by the State Board. A number of trash monitoring and assessment methods will be tested through the project and assist the City/County in developing a robust set of indicators for demonstrating progress toward trash reduction goals.**

C.10.d ►Summary of Trash Reduction Actions

For each trash reduction action (i.e., control measures and best management practices) implemented by your municipality during the reporting period include a full description of the action. Describe actions initiated prior to and continued after the MRP effective date (December 2009), actions initiated after the MRP effective date, and actions planned for future implementation. If a planned action, also include the planned date of implementation. Add rows for actions not listed below as needed. Also identify the dominant source of trash and dominant types of trash removed for each action. To the extent possible, identify the applicable management areas identified on the map created under reporting section C.10.a.iii.

Action	Description	Trash Management Area(s) (Preliminary Map ID)	Dominant Sources	Dominant Types
Trash Management Area Specific Actions				
Full-Capture Treatment Devices	Continued Pre-MRP Actions: None.	None.	Residential, vehicular, pedestrian.	Litter: plastic bottles, single use food packaging, etc.
	New/Enhanced Post-MRP Actions Initiated/Planned: 38 units installed covering major high density areas.	63.66 acres, areas 1, 2, 4, 5, 6		
Street Sweeping	Continued Pre-MRP Actions: Weekly, retail areas.	1-4	Residential, vehicular, pedestrian.	Litter: plastic bottles, single use food packaging, etc.
	New/Enhanced Post-MRP Actions Initiated/Planned: Citywide, with enhanced frequencies dependent on land use and prioritization areas.	1-7		
On-land Trash Cleanups	Continued Pre-MRP Actions: None.	None.	Residential,	Litter:

C.10.d ►Summary of Trash Reduction Actions

For each trash reduction action (i.e., control measures and best management practices) implemented by your municipality during the reporting period include a full description of the action. Describe actions initiated prior to and continued after the MRP effective date (December 2009), actions initiated after the MRP effective date, and actions planned for future implementation. If a planned action, also include the planned date of implementation. Add rows for actions not listed below as needed. Also identify the dominant source of trash and dominant types of trash removed for each action. To the extent possible, identify the applicable management areas identified on the map created under reporting section C.10.a.iii.

Action	Description	Trash Management Area(s) (Preliminary Map ID)	Dominant Sources	Dominant Types
	New/Enhanced Post-MRP Actions Initiated/Planned: Two per year, citywide, including events on Coastal Cleanup Day, National River Cleanup day and City Anniversary Cleanup Day	1-3	vehicular, pedestrian, illegal dumping.	plastic bottles, single use food packaging, etc, furniture.
Partial-Capture Treatment Devices	Continued Pre-MRP Actions: None.	None.	Residential, vehicular, pedestrian.	Litter: plastic bottles, single use food packaging, etc.
	New/Enhanced Post-MRP Actions Initiated/Planned: Installation of 200 stormdrain screen bars at 2" separations.	1-7; Citywide		
Enhanced Storm Drain Inlet Maintenance	Continued Pre-MRP Actions: None.	None.	Residential, vehicular, pedestrian, illegal dumping.	Litter: plastic bottles, single use food packaging, etc.
	New/Enhanced Post-MRP Actions Initiated/Planned: Starting in 2014, Citywide Stormdrain Master Plan to reassess maintenance activities and begin comprehensive maintenance plan. Details to be determined with Long Term trash Load Reduction Plan.	TBD		
Activities to Reduce Trash from Uncovered	Continued Pre-MRP Actions: None.	None.	Residential, vehicular,	All Types

C.10.d ►Summary of Trash Reduction Actions

For each trash reduction action (i.e., control measures and best management practices) implemented by your municipality during the reporting period include a full description of the action. Describe actions initiated prior to and continued after the MRP effective date (December 2009), actions initiated after the MRP effective date, and actions planned for future implementation. If a planned action, also include the planned date of implementation. Add rows for actions not listed below as needed. Also identify the dominant source of trash and dominant types of trash removed for each action. To the extent possible, identify the applicable management areas identified on the map created under reporting section C.10.a.iii.

Action	Description	Trash Management Area(s) (Preliminary Map ID)	Dominant Sources	Dominant Types
Loads	New/Enhanced Post-MRP Actions Initiated/Planned: Enhanced Enforcement for uncovered loads.	1-7; Citywide	pedestrian, illegal dumping.	
Anti-littering and Illegal Dumping Enforcement Activities	Continued Pre-MRP Actions: Modest efforts, no trackable methods.	1-7; Citywide	Residential, vehicular, pedestrian, illegal dumping.	All Types
	New/Enhanced Post-MRP Actions Initiated/Planned: Enhanced efforts through the Partnership in Pride Campaign for Education and Encouragement; Clean City, Clean Bay Program for enhanced Enforcement, including surveillance in areas of highest priority.	1-7 Citywide.		
Improved Trash Bins/Container Management	Continued Pre-MRP Actions: None.	N/A	Residential, Business	All types
	New/Enhanced Post-MRP Actions Initiated/Planned: Starting in 2014, the city will initiate education, encouragement and enforcement, to ensure appropriate trash container management practices throughout the City	Priority Areas 1-7		
Creek, Channel, Shoreline Cleanups	Continued Pre-MRP Actions: None. Cleanups occurred through adjacent agency efforts.	N/A	Residential, vehicular, pedestrian, water/windblown, illegal dumping.	Litter: plastic bottles, single use food packaging, etc.
	New/Enhanced Post-MRP Actions Initiated/Planned: City cleanups for Coastal Cleanup Day and National River Cleanup Day, annually.	6B		
Area/Jurisdictional-wide Actions				
Single-Use Carryout Bag	Continued Pre-MRP Actions: None.	Jurisdiction-wide	Retail shopping	Plastic

C.10.d ►Summary of Trash Reduction Actions

For each trash reduction action (i.e., control measures and best management practices) implemented by your municipality during the reporting period include a full description of the action. Describe actions initiated prior to and continued after the MRP effective date (December 2009), actions initiated after the MRP effective date, and actions planned for future implementation. If a planned action, also include the planned date of implementation. Add rows for actions not listed below as needed. Also identify the dominant source of trash and dominant types of trash removed for each action. To the extent possible, identify the applicable management areas identified on the map created under reporting section C.10.a.iii.

Action	Description	Trash Management Area(s) (Preliminary Map ID)	Dominant Sources	Dominant Types
Policies	New/Enhanced Post-MRP Actions Initiated/Planned: Citywide ordinance adopted April 2013 to begin October 2, 2013.			Bags
Polystyrene Foam Food Service Ware Policies	Continued Pre-MRP Actions: None.	Jurisdiction-wide	Restaurant Take-Out	Polystyrene
	New/Enhanced Post-MRP Actions Initiated/Planned: To be determined.			
Public Education and Outreach Programs	Continued Pre-MRP Actions: None/except at the county level.	Jurisdiction-wide	All Sources	All Types
	New/Enhanced Post-MRP Actions Initiated/Planned: Local Partnership in Pride Campaign to engage residents, businesses and staff in reducing litter and engaging in community cleanup campaigns.			

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).

1) The city meets these efforts through promotion of:

a) Household Hazardous Waste (HHW) programs: In coordination with the Rethink Waste (part of the South County Waste Management Authority (SCWMA), the City provided printed outreach materials including promotion of no-additional-cost HHW door-to-door pick-up of household hazardous waste, including mercury containing products (e.g., bulbs, thermostats, thermometers and/or switches), including the telephone (in English and Spanish) of the door-to-door service, contracted through SCWMA. In addition, the City promoted these efforts on the City's Environmental Health Facebook page.

b) The Thermostat Recycling Corporation, an organization developed on behalf of the thermostat manufacturers, that recycles mercury-containing thermostats and switches generated by residents and small businesses. The HVAC industry is the largest generator of these waste streams and is the targeted audience to inform of this recycling option, was promoted on the City's Environmental Health Facebook page

c) San Mateo County Small Quantify Generator Program, a program designed for businesses that generate small quantities of hazardous waste and do not need to participate in the Countywide Hazardous Waste Inspection Program, has been promoted by the City's Environmental Coordinator at the time of business inspections to assist with proper disposal of these materials.

d) City Collection of municipal waste: The city collects fluorescent bulbs generated by municipal activates and returns these materials to the contractor who provides the municipal lighting equipment, as indicated below.

C.11.a.ii ►Mercury Collection

Provide an estimate of the mass of mercury collected through these efforts, or provide a reference to a report containing this estimate.

Please refer to the SMCWPPP FY 12-13 Annual Report for an estimate of the mass of mercury collected through collection and recycling efforts in the SMCWPPP area. While the City collects and returns the CFLs and Fluorescent lamps to the contractor, the City has no way of estimating the amount of mercury recovered through these efforts. As part of next year's improvements, this gap in information will hopefully be remedied.

Mercury Containing Device/Equipment	Total Amount of Devices Collected	Estimated Mass of Mercury Collected
Fluorescent Lamps[63] (linear feet)	**1180**	**Unknown.**
CFLs[64] (2) (each)	**45**	**Unknown.**
Thermostats[65] (each)	**None.**	**N/A**

[63] Only linear fluorescent lamps should be included

[64] Only compact fluorescent lamps should be included

[65] Thermostats can be reported by quantity or by pounds. Whichever unit is used, please avoid double-counting.

Thermostats (lbs)	**None.**	**N/A**
Thermometers (each)	**None.**	**N/A**
Switches (lbs)	**None.**	**N/A**
Total Mass of Mercury Collected During FY 2012-2013:		**Unknown.**

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 SMCWPPP and regional accomplishments for these sub-provisions are included within the C.11 Mercury Controls section of the SMCWPPP FY 12-13 Annual Report and/or the BASMAA Regional POC Report.

Section 12 - Provision C.12 PCBs Controls

C.12.a.ii,iii ►Ongoing Training
(For FY 10-11 Annual Report and Each Annual Report Thereafter) List below or attach description of ongoing training development and inspections for PCB identification, including documentation and referral to appropriate regulatory agencies (e.g. county health departments, Department of Toxic Substances Control, California Department of Public Health, and the Water Board) as necessary.
Description: **The City does a pre-inspection for new industrial facilities to ensure this provision is met; inspectors have been trained to identify common equipment that contains PCBs. All existing facilities have been inspected and do not appear to have PCB containing equipment on-site.**

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 SMCWPPP and regional accomplishments for these sub-provisions are included within the C.12 PCB Controls section of the SMCWPPP FY 12-13 Annual Report and/or the BASMAA Regional POC Report.**

Section 13 - Provision C.13 Copper Controls

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

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

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

- **The City of East Palo Alto participated in municipal staff training at April 11, 2013 Construction Site Inspection Workshop.**
- **Development of BMPs. The Countywide Program collaborated with BASMAA to develop BMPs to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post construction."**
- **Permitting Procedures require the BMPs developed through the Countywide Program, including the use of the updated Stormwater Requirements Checklist to include the architectural copper BMPs in the list of source controls measures that may apply to projects. The City of East Palo Alto uses this as a screening method for determining whether additional outreach is needed.**
- **The City also adds into the Conditions of Approval language to specify appropriate use of architectural copper and recommends against on-site chemical treatments.**
- **The Countywide Program, in collaboration with the Santa Clara Valley Urban Runoff Pollution Prevention Program, prepared an educational flyer on the BMPs. Staff is distributing the flyer on architectural copper to project applicants although the practice of installing architectural copper is rare in East Palo Alto.**
- **Enforcement Actions against Noncompliance would include a stop work if a notable discharge was observed, as indicated in the City's Enforcement Response Plan. There have been no incidents of noncompliance with the architectural copper BMPs so far.**

Supporting Documents:
Flyer on Architectural Copper BMPs
April 11, 2013 Construction Site Inspection Workshop Attendance List

C.13.a.iii.(3) ►Evaluation of Effectiveness

(FY 12-13 Annual Report) Evaluate the effectiveness of measures the agency has undertaken to prevent discharge of wastewater to storm drains during the installation, cleaning, treating, and washing of the surface of copper architectural features. The discussion of the effectiveness of these measures should include BMP implementation and may propose additional measures to address this source of pollutants.

The City of East Palo Alto has a high incidence of scrap metal recyclers. As such, there are few if any incidents of architectural copper use in East Palo Alto. There Architectural Copper BMPs flyers available at the Permit Center, and conditions are placed on the project to prevent discharge of wastewater during installation, cleaning, treating and washing of the surface of copper features.

C.13.c ►Vehicle Brake Pads

Reported in a separate regional report.

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

C.13.c.iii ►Water Quality Issues Associated with Automobile Brake Pads

(FY 12-13 Annual Report Only) – Assess status of copper water quality issues associated with automobile brake pads and recommend brake-pad related actions for inclusion in subsequent permits if needed.

An assessment of copper water quality issues associated with automobile brake pads and recommend brake-pad related actions for inclusion in subsequent permits is included within the C.13 Copper Controls section of the SMCWPPP FY 12-13 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

No facilities were identified as potential users of copper during regular or complaint-driven inspections.

Permittee Name: City of East Palo Alto

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

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

Summary

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

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

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

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

Summary

A summary of SMCWPPP and regional efforts related to the Control Program for PBDEs, Legacy Pesticides and Selenium is included within the C.14 PBDE, Legacy Pesticides and Selenium section of the SMCWPPP FY 12-13 Annual Report and/or BASMAA Regional POC Report.

C.14.a.v. ►Control Programs for PBDEs, Legacy Pesticides and Selenium Controls – Load Computation

(For FY 12-13 Annual Report only) Submit a report with information required to compute loading estimates of PBDEs, legacy pesticides and selenium from urban runoff to the Bay.

Summary

Information required to compute loading estimates of PBDEs, legacy pesticides and selenium from urban runoff to the Bay is included within the C.14 PBDE, Legacy Pesticides and Selenium section of the SMCWPPP FY 12-13 Annual Report and/or BASMAA Regional POC Report.

C.14.a.vi. ►Control Programs for PBDEs, Legacy Pesticides and Selenium Controls – Control Measures

(For FY 12-13 Annual Report only) Submit a report identifying control measures and/or management practices to reduce impacts from discharges of PBDEs, legacy pesticides or selenium in urban runoff.

A report identifying control measures and/or management practices to reduce impacts from discharges of PBDEs, legacy pesticides or selenium in urban runoff is included within the C.14 PBDE, Legacy Pesticides and Selenium section of the SMCWPPP FY 12-13 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?	X	Yes		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:

1)The city participated in the SMCWPPP Water Utility Work Group; and 2) attended the November 13, 2012 SMCWPPP Water Utility Training Workshop. For information on the Municipal Maintenance Workshop (attendance list, agenda, etc.) see http://www.flowstobay.org/ms_current_projects.php.

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

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

- Promote conservation programs
- Promote outreach for less toxic pest control and landscape management
- Promote use of drought tolerant and native vegetation
- Promote outreach messages to encourage appropriate watering/irrigation practices
- Implement Illicit Discharge Enforcement Response Plan for ongoing, large volume landscape irrigation runoff.

Summary:

The City of East Palo Alto is proud of the minimal use of water on a per-capita basis—one of the lowest per-capita usage in the Peninsula—possibly due to the low amount of irrigated vegetation in the community. The City sends out bills and notices always with a prominent conservation message on the front page about the value of water and the need to conserve it.

The City promotes OWOW at the local Home Depot, and distributes outreach about these products at all City events (listed in C.9). In addition, the City promotes the use of drought tolerant and native vegetation at local events in collaboration with Home Depot and mentions these practices when inspecting local businesses and business district meetings. The City also encourages watering/irrigation practices that minimizes the use of water for irrigation by identifying irrigation runoff and discussing the issue with the property owner/tenent.

The City's inspection team implements the Enforcement Response Plan to address large volume landscape irrigation runoff, when applicable.

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[66] (NTU)	Implemented BMPs & Corrective Actions
2770 Hunter St	Water main/hydrant flushing	Storm drain	7/30/12	1100-1103	600	288000	0.02	9.4	6	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
2724 Xavier St	Water main/hydrant flushing	Storm drain	7/30/12	1110-1120	2500	360000	0.01	9.6	15	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Westminister Dr	Water main/hydrant flushing	Storm drain	8/14/12	1040-1045	1000	288000	0.01	9.8	2	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
2251 Capitol	Water main/hydrant flushing	Storm drain	8/14/12	1310-1315	1250	360000	0.02	9.6	12	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
650 Runnymede	Water main/hydrant flushing	Storm drain	8/14/12	1325-1328	900	432000	0.03	9.4	20	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Runnymede St X University Ave	Water main/hydrant flushing	Storm drain	8/14/12	1340-1345	1500	432000	0.02	9.3	15	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Bay Rd X Pulgas Ave	Fire Flow Test	Storm drain	8/22/12	1140-1142	2200	1584000	0.01	9.3	6.8	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
Bay Rd X Tara St	Water main/hydrant flushing	Storm drain	8/22/12	1150-1155	300	432000	0.02	9.7	7.7	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet
500 Weeks St	Water main/blowoff flushing	Storm drain	9/18/12	0905-0920	1500	144000	0.14	8.8	35.4	Dechlorinating tablets, Filter cloth & gravel bags around drain inlet

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

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[67] (NTU)	Implemented BMPs & Corrective Actions
940 Clarke Ct	Water main/hydrant flushing	Storm drain	9/25/12	1110-1120	1500	216000	0.08	9.2	18.4	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Carole Ct X Weeks St	Water main/hydrant flushing	Storm drain	9/26/12	1340-1345	1250	360000	0.04	9.3	27.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Tuscany Ct X Runnymede St	Water main/hydrant flushing	Storm drain	9/26/12	1455-1500	1750	504000	0.06	9.3	9.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2288 Tuscany Ct	Water main/hydrant flushing	Storm drain	9/26/12	1445-1450	1250	360000	0.04	9.4	8.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2309 Vines Ct	Water main/hydrant flushing	Storm drain	9/26/12	1505-1510	1750	504000	0.06	9.2	14.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Gloria Wy X Bay Rd	Hydrant flushing for well sampling	Storm drain	10/08/12	1000-1015	1000	288000	0	9.6	2.63	Filter cloth & gravel bags around drain inlets
350 Demeter St	Fire flow test	Storm drain	10/17/12	0950-0955	5650	1627200	0.05	9.8	34.1	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bay Rd X Pulgas Ave	Fire flow test	Storm drain	10/17/12	1040-1042	2260	1627200	0.01	9.8	30.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Donohoe St X Cooley Ave	Fire flow test	Storm drain	10/17/12	1350-1355	5475	1576800	0.08	9.1	44.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[68] (NTU)	Implemented BMPs & Corrective Actions
2033 Pulgas Ave	Fire flow test	Storm drain	10/17/12	1100-1108	8760	1576800	0.08	9.5	45.7	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
O'Connor St X Euclid Ave	Fire flow test	Storm drain	10/17/12	1330-1335	5300	1526400	0.04	9.6	26.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Camellia Dr X Pulgas Ave	Fire flow test	Storm drain	10/17/12	1115-1120	5300	1526400	0.06	8.9	74.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
East end of Weeks St	Fire flow test	Storm drain	10/17/12	0911-0915	4240	1526400	0.02	9.8	20.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Rutgers St X Fordham St	Water main/hydrant flushing	Storm drain	10/18/12	0900-0930	3000	144000	0.07	9.3	59	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Fordham St X Stevens Ave	Water main/hydrant flushing	Storm drain	10/18/12	0940-1010	3000	144000	0.06	8.6	47	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Fordham St	Water main/hydrant flushing	Storm drain	10/18/12	1020-1050	4500	216000	0.07	9.4	17.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Stevens Ave	Water main/hydrant flushing	Storm drain	10/18/12	1100-1130	3000	144000	0.18	9.5	11.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Illinois St X Purdue Ave	Water main/hydrant flushing	Storm drain	10/23/12	1000-1020	2000	144000	0.06	9.1	44.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[69] (NTU)	Implemented BMPs & Corrective Actions
Ralmar Ave X Alberni St	Water main/hydrant flushing	Storm drain	10/23/12	1100-1115	2250	216000	0.02	9.1	23.1	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Menalto Ave X Bay Rd	Water main/hydrant flushing	Storm drain	10/24/12	1425-1440	1500	144000	0.02	9.3	73.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Menalto Ave X Holland St	Water main/hydrant flushing	Storm drain	10/24/12	1405-1420	1500	144000	0.06	9.2	90.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
E. Bayshore Rd X Menalto Ave	Water main/hydrant flushing	Storm drain	10/24/12	1330-1345	2250	216000	0.04	9.3	18	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
160 Jasmine Wy	Water main/hydrant flushing	Storm drain	10/26/12	1120-1130	1000	144000	0.05	9.0	55	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
933 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/12	1130-1133	750	216000	0.06	9.3	9.83	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
940 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/12	1045-1055	1000	144000	0.06	9.2	39.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
949 Clarke Ct	Water main/blowoff flushing	Storm drain	9/25/12	1122-1125	750	216000	0.04	9.2	8.48	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
785 Carole Ct	Water main/blowoff flushing	Storm drain	9/26/12	1328-1324	1500	216000	0.08	9.4	13.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[70] (NTU)	Implemented BMPs & Corrective Actions
809 Paul Robeson Ct	Water main/blowoff flushing	Storm drain	9/26/12	1400-1405	1500	432000	0.03	9.3	37.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
819 Jamie Ln	Water main/blowoff flushing	Storm drain	9/26/12	1414-1420	1500	360000	0.05	9.4	39.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2278 Tuscany Ct	Water main/blowoff flushing	Storm drain	9/26/12	1430-1435	1500	432000	0.06	9.2	23.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2151 Euclid Ave	Water main/hydrant flushing	Storm drain	3/15/13	1250-1300	4000	576000	0.02	9.2	8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Manhattan Ave X Woodland Ave	Water main/hydrant flushing	Storm drain	3/15/13	1315-1325	2500	360000	0.03	9.6	15	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1997 Manhattan Ave	Water main/hydrant flushing	Storm drain	3/15/13	1305-1315	2500	360000	0.03	9.5	12	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Pulgas Ave X Weeks St	Water main/hydrant flushing	Storm drain	3/20/13	1505-1515	2000	288000	0.14	9.63	21.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Pulgas Ave X Bay Rd	Water main/hydrant flushing	Storm drain	3/22/13	1010-1020	2000	288000	0.05	9.2	45.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2555 Pulgas Ave	Water main/hydrant flushing	Storm drain	3/22/13	1030-1040	2500	360000	0.11	9.6	55.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[71] (NTU)	Implemented BMPs & Corrective Actions
150 Tara St	Water main/hydrant flushing	Storm drain	3/22/13	1110-1115	1000	288000	0.11	9.4	16.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1861 Bay Rd	Water main/hydrant flushing	Storm drain	3/22/13	1120-1130	2000	288000	0.06	9.4	24.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
350 Demeter St	Water main/hydrant flushing	Storm drain	3/22/13	1145-1155	2000	288000	0.07	9.5	31.6	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
325 Demeter St	Water main/hydrant flushing	Storm drain	3/22/13	1340-1350	2500	360000	0.06	9.2	30.4	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
219 Demeter St	Water main/hydrant flushing	Storm drain	3/22/13	1355-1405	1500	216000	0.08	9.3	21.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
141 Demeter St	Water main/hydrant flushing	Storm drain	3/22/13	1410-1420	2000	288000	0.11	9.0	33.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bay Rd X Demeter St	Water main/hydrant flushing	Storm drain	3/22/13	1422-1430	1200	216000	0.04	9.4	21.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1836 Bay Rd	Water main/hydrant flushing	Storm drain	3/22/13	1435-1445	2000	288000	0.03	9.0	13.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Tea Ct	Water main/hydrant flushing	Storm drain	3/27/13	0940-0950	2500	360000	0.16	9.6	21	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[72] (NTU)	Implemented BMPs & Corrective Actions
Runnymede Ct	Water main/hydrant flushing	Storm drain	3/28/13	0936-0956	5000	360000	0.08	9.4	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Veronica Ct	Water main/hydrant flushing	Storm drain	3/28/13	1005-1015	2000	288000	0.24	9.3	30.8	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Mandela Ct	Water main/hydrant flushing	Storm drain	3/28/13	1116-1124	2000	360000	0.34	9.2	28.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
877-C Donohoe St	Water main/hydrant flushing	Storm drain	3/28/13	1140-1150	2000	288000	0.19	9.1	39.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Verbena Dr X Gardenia Wy	Water main/hydrant flushing	Storm drain	3/28/13	1415-1425	1000	144000	0.05	9.2	44	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Alberni St X Laurel Ave	Water main/hydrant flushing	Storm drain	3/28/13	1800-1810	1000	144000	0.10	9.0	63	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Bell St X University Ave	Water main/hydrant flushing	Storm drain	4/26/13	1420-1430	1500	216000	0.09	9.6	22	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Wisteria Dr X Aster Wy	Water main/hydrant flushing	Storm drain	4/30/13	1420-1440	3000	216000	0.12	9.3	25.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1861 Bay Rd	Fire flow test	Storm drain	1/10/13	1200-1205	5650	1627200	0.25	9.2	63	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Runnymede St X Avelar St	Fire flow test	Storm drain	1/28/13	1000-1005	5650	1627200	0.05	9.2	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

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

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[72] (NTU)	Implemented BMPs & Corrective Actions
325 Demeter St	Fire flow test	Storm drain	1/29/13	1400-1402	2060	1483200	0.03	9.3	120	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
837 Donohoe St	Fire flow test	Storm drain	2/11/13	1000-1005	2120	1526400	0.05	9.2	46.7	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Cooley Ave X Bell St	Fire flow test	Storm drain	3/13/13	0940-0942	2040	1468800	0.05	9.2	46	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1877 Bay Rd	Fire flow test	Storm drain	5/16/13	1040-1043	3570	1713600	0.05	9.3	23	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2396 University Ave	Fire flow test	Storm drain	6/12/13	1500-1502	2000	1440000	0.36	8.99	92.3	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1261 Runnymede Ct	Water main/blowoff flushing	Storm drain	3/28/13	0950-1000	1000	144000	.04	9.3	35	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1118 Mandela Ct	Water main/blowoff flushing	Storm drain	3/28/13	1020-1030	1000	144000	0.06	9	39	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
1035 Ruth Ct	Water main/blowoff flushing	Storm drain	3/28/13	1032-1041	900	144000	0.32	9	25.2	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
2278 Tuscany Ct	Water main/blowoff flushing	Storm drain	3/28/13	1045-1055	1500	216000	0.02	9.1	20.9	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
Salas Ct	Water main/blowoff flushing	Storm drain	3/28/13	1105-1115	1000	144000	0.22	9.3	30.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets
841 Donohoe St	Water main/blowoff flushing	Storm drain	3/28/13	1120-1130	1000	144000	0.30	9	29.5	Dechlorinating tablets, filter cloth & gravel bags around drain inlets

C.15.b.iii.(2) ►Unplanned Discharges of the Potable Water System[73]

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)[74]	pH (standard units) [52]	Discharge Turbidity (Visual) [52,]	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time[75]	Inspector arrival time	Responding crew arrival time
2833 Georgetown St	Main leak	Storm Drain	7/12/12	1400-1430	1500	72000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1400	Not Required	1430	1430
2450 Ralmar Ave	Hydrant knockdown	School soccer field	9/7/12	1930-2030	30000	720000	Not Collected	Not Collected	Not Collected	Closed valves	1930	Not Required	2000	2000
1938 Capitol Ave	Service leak	Storm drain	10/26/12	0730-0830	300	7200	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	0730	Not Required	0800	0800
152 Jasmine Wy	Main leak	Storm drain	10/26/12	0015-0145	27000	432000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	0015	Not Required	0045	0045
10 Lita Lane	Service leak	Large empty lot/dirt field	1/14/13	0845-0845	7200	7200	Not Collected	Not Collected	Not Collected		0845	Not Required	0945	0945
2792 Hunter St	Main leak	Storm drain	1/18/13	0700-0800	6000	144000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	0700	Not Required	0745	0745
Temple Court	Main leak	Storm drain	1/16/13	1430-1500	6000	288000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1430	Not Required	1430	1430
Temple Court	Main leak	Storm drain	1/17/13	1130-1135	2000	576000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1130	Not Required	1130	1130
Temple Court	Main leak	Storm drain	1/17/13	1420-1430	2000	288000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1420	Not Required	1420	1420

[73] This table contains all of the unplanned discharges that occurred in this FY.
[74] 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.
[75]. 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.

C.15.b.iii.(2) ►Unplanned Discharges of the Potable Water System[73]

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)[74]	pH (standard units)[52]	Discharge Turbidity (Visual)[52,]	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time[75]	Inspector arrival time	Responding crew arrival time
Alberni St X Menalto Ave	Main leak	Storm drain	3/29/13	1000-1100	12000	288000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1000	Not Required	1030	1030
Gardenia Wy X Verbena Dr	Main leak	Storm drain	3/29/13	0900-1000	48000	1152000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	0900	Not Required	0930	0930
Larkspur Dr X Sage St	Main leak	Storm drain	4/17/13	1000-1100	18000	432000	0.06	9.1	69.3	Closed valves, filter cloth, gravel bags around DI	1000	Not Required	1030	1030
Circle Dr X Scofield Ave	Main leak	Storm drain	4/17-4/18/13	1400-1400	14400	14400	0.05	9.1	22	Closed valves, filter cloth, gravel bags around DI	1400	Not Required	1430	1430
1215 Laurel Ave	Main leak	Storm drain	4/17/13	1030-1050	6000	432000	0.09	9.3	49	Closed valves, filter cloth, gravel bags around DI	1030	Not Required	1050	1050
Lita Lane	Service leak	Large empty dirt lot/field	4/17/13	0900-1700	2400	7200	Not Collected	Not Collected	Not Collected	None Necessary	0900	Not Required	0915	0915
2550 Annapolis Dr	Main leak	Storm drain	5/10/13	0650-0850	1200	14400	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	0650	Not Required	0730	0730
2543 Fordham St	Main leak	Storm drain	5/14/13	2200-2330	9000	14400	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	2200	Not Required	2300	2300
375 Donohoe St	Service leak	Storm drain	5/25-5/28/13	1800-1400	4080	1440	0.25	9.2	18	Closed valves, filter cloth, gravel bags around DI	1800	Not Required	1900	1900
35 Buchanan Ct	Meter leak	Park strip	5/28/13	Unknown	Unknown	120	Not Collected	Not Collected	Not Collected	None Necessary	0800	Not Required	0815	0815
2154 University Ave	Hydrant knockdown	Storm drain	3/1/13	1050-1110	10000	720000	0.15	9.4	40	Closed valves, filter cloth, gravel bags around DI	1050	Not Required	1100	1100
Myrtle Ave X Pulgas Ave	Hydrant knockdown	Storm drain	3/15/13	1440-1500	20000	144000	Not Collected	Not Collected	Not Collected	Closed valves, filter cloth, gravel bags around DI	1440	Not Required	1500	1500

ATTACHMENTS

C.2
Attachments

C.2 Attachment

DO Testing O'Connor Pump Station 6-10-13

SAN MATEO COUNTYWIDE
Water Pollution Prevention Program
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City of East Palo Alto

Stormwater Pump Station Form
Inspections & Dry Season DO Monitoring

Date: 6/10/13 **Time:** 1000

Staff Name: Brian Doherty - TEC Accutite **Pump Station:** O'Connor Pump Station

DISSOLVED OXYGEN MONITORING (Use this portion of the form for dry season[1] DO monitoring and needed follow up corrective actions if DO level(s) are at or below 3 mg/l).

DO Monitoring Type (check one):

X	Routine Dry Season		Follow up Testing after Implementing Corrective Actions[2]

Location of DO Testing (check one):

X	Pump Station Forebay		Discharge Flow while Pump(s) Are Being Operated		Other – Describe

DO Value (mg/L): 7.8

Temperature (optional) 17.6

Corrective Action/s (check all that apply):

X	**None Needed, DO Levels OK**		**Re-circulate Wet Well Water**
	Adjust Float Level		**Clean Wet Well**
	Deploy Temporary Aeration Device (Wet Well)		**Install Permanent Aeration Device (Wet Well)**
	Deploy Temporary Aeration Structure/s (Outfall)		**Install Permanent Aeration Structure/s (Outfall)**
	Other (Describe):		

Comments:

[1] Dry season is undefined in the MRP's Glossary, but it could be assumed to be May 1 through September 30.
[2] For DO monitoring after implementing corrective actions, the DO monitoring interval must occur weekly until two weekly samples are above 3 mg/L.

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Stormwater Pump Station Form
Inspections & Dry Season DO Monitoring

Date: 6/10/17 **Time:** 1015

Staff Name: Brian Doherty - TEC Accutite **Pump Station:** O'Connor Pump Station

DISSOLVED OXYGEN MONITORING (Use this portion of the form for dry season[1] DO monitoring and needed follow up corrective actions if DO level(s) are at or below 3 mg/l).

DO Monitoring Type (check one):

X	Routine Dry Season		Follow up Testing after Implementing Corrective Actions[2]

Location of DO Testing (check one):

	Pump Station Forebay	X	Discharge Flow while Pump(s) Are Being Operated		Other – Describe

DO Value (mg/L): 8.5

Temperature (optional) 18.1

Corrective Action/s (check all that apply):

X	**None Needed, DO Levels OK**		**Re-circulate Wet Well Water**
	Adjust Float Level		**Clean Wet Well**
	Deploy Temporary Aeration Device (Wet Well)		**Install Permanent Aeration Device (Wet Well)**
	Deploy Temporary Aeration Structure/s (Outfall)		**Install Permanent Aeration Structure/s (Outfall)**
	Other (Describe):		

Comments:

[1] Dry season is undefined in the MRP's Glossary, but it could be assumed to be May 1 through September 30.
[2] For DO monitoring after implementing corrective actions, the DO monitoring interval must occur weekly until two weekly samples are above 3 mg/L.

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Stormwater Pump Station Form
Inspection & Dry Season DO Monitoring

PUMP STATION INSPECTION INFORMATION (Use this portion of form to document inspections).

Inspection Type (check all that apply):

	Wet season[3]	X	Dry season DO testing		Dry weather[4] collection system screening

Catchment Area Type (If Known, Estimate Percent of Land Use for Each Type Listed Below):

	Industrial		Commercial		Residential		Park and Open Space

OBSERVATIONS (check all that apply):

Trash

	Not Present	X	Present

If trash present, visually estimate the quantity	10 no. of 32-gallon bags

Odor

X	Absent		Present

Color

X	Absent		Present

Turbidity

X	Not Detected		Low		Medium		High

Hydrocarbon Sheen

X	Not Detected		Low		Medium		High

WASTES REMOVED FROM PUMP STATION:

Estimate the volume or mass of waste materials removed, if any, from the pump station:

trash removed at a later date

Comments (Include information about any illicit discharges and illegal dumping problems found):

[3] Wet season is defined in the MRP's Glossary as "October 1 through April 30 of each year." Wet season inspections must occur 2x per year on the first business day after ¼-inch & larger storm events that have been preceded by no rainfall for a minimum of a two week antecedent period.
[4] Dry weather is defined in MRP's Provision C.5.e.ii as "meaning no significant rainfall within the past 3 weeks."

C.2 Attachment

DO Testing O'Connor Pump Station 6-24-13

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Stormwater Pump Station Form
Inspections & Dry Season DO Monitoring

Date: 6/24/13 **Time:** 1007

Staff Name: Brian Doherty-TEC Accutite **Pump Station:** O'Connor Pump Station

DISSOLVED OXYGEN MONITORING (Use this portion of the form for dry season[1] DO monitoring and needed follow up corrective actions if DO level(s) are at or below 3 mg/l).

DO Monitoring Type (check one):

X	Routine Dry Season		Follow up Testing after Implementing Corrective Actions[2]

Location of DO Testing (check one):

X	Pump Station Forebay		Discharge Flow while Pump(s) Are Being Operated		Other – Describe

DO Value (mg/L): 7.1

Temperature (optional) 18.4

Corrective Action/s (check all that apply):

X	**None Needed, DO Levels OK**		**Re-circulate Wet Well Water**
	Adjust Float Level		**Clean Wet Well**
	Deploy Temporary Aeration Device (Wet Well)		**Install Permanent Aeration Device (Wet Well)**
	Deploy Temporary Aeration Structure/s (Outfall)		**Install Permanent Aeration Structure/s (Outfall)**
	Other (Describe):		

Comments:

[1] Dry season is undefined in the MRP's Glossary, but it could be assumed to be May 1 through September 30.
[2] For DO monitoring after implementing corrective actions, the DO monitoring interval must occur weekly until two weekly samples are above 3 mg/L.

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Stormwater Pump Station Form
Inspections & Dry Season DO Monitoring

Date: 6/24/13 **Time:** 0955

Staff Name: Brian Doherty - TEC Accutite **Pump Station:** O'Connor Pump Station

DISSOLVED OXYGEN MONITORING (Use this portion of the form for dry season[1] DO monitoring and needed follow up corrective actions if DO level(s) are at or below 3 mg/l).

DO Monitoring Type (check one):

X	Routine Dry Season		Follow up Testing after Implementing Corrective Actions[2]

Location of DO Testing (check one):

	Pump Station Forebay	X	Discharge Flow while Pump(s) Are Being Operated		Other – Describe

DO Value (mg/L): 7.3

Temperature (optional) 17.9

Corrective Action/s (check all that apply):

X	**None Needed, DO Levels OK**		**Re-circulate Wet Well Water**
	Adjust Float Level		**Clean Wet Well**
	Deploy Temporary Aeration Device (Wet Well)		**Install Permanent Aeration Device (Wet Well)**
	Deploy Temporary Aeration Structure/s (Outfall)		**Install Permanent Aeration Structure/s (Outfall)**
	Other (Describe):		

Comments:

[1] Dry season is undefined in the MRP's Glossary, but it could be assumed to be May 1 through September 30.
[2] For DO monitoring after implementing corrective actions, the DO monitoring interval must occur weekly until two weekly samples are above 3 mg/L.

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Stormwater Pump Station Form
Inspection & Dry Season DO Monitoring

PUMP STATION INSPECTION INFORMATION (Use this portion of form to document inspections).

Inspection Type (check all that apply):

	Wet season[3]	X	Dry season DO testing		Dry weather[4] collection system screening

Catchment Area Type (If Known, Estimate Percent of Land Use for Each Type Listed Below):

	Industrial		Commercial		Residential		Park and Open Space

OBSERVATIONS (check all that apply):

Trash

	Not Present	X	Present	If trash present, visually estimate the quantity	5 no. of 32-gallon bags

Odor

X	Absent		Present

Color

X	Absent		Present

Turbidity

	Not Detected	X	Low 3.4 NTU		Medium		High

Hydrocarbon Sheen

X	Not Detected		Low		Medium		High

WASTES REMOVED FROM PUMP STATION:

Estimate the volume or mass of waste materials removed, if any, from the pump station:

trash removed at a later time

Comments (Include information about any illicit discharges and illegal dumping problems found):

Nothing noticable but cans, bottles, etc.

[3] Wet season is defined in the MRP's Glossary as "October 1 through April 30 of each year." Wet season inspections must occur 2x per year on the first business day after ¼-inch & larger storm events that have been preceded by no rainfall for a minimum of a two week antecedent period.

[4] Dry weather is defined in MRP's Provision C.5.e.ii as "meaning no significant rainfall within the past 3 weeks."

C.9
Attachments

C.9 Attachment

Resolution 4234 Adopting City's Integrated Pest Management Policy

ATTACHMENT A

RESOLUTION NO 4234

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EAST PALO ALTO ADOPTING THE CITY'S INTEGRATED PEST MANAGEMENT POLICY IN COMPLIANCE WITH THE REQUIREMENTS OF THE SAN FRANCISCO BAY REGIONAL WATER QUALITY BOARD

WHEREAS, the Environmental Protection Agency, under the 1987 amendments to the Federal Clean Water Act, imposed regulations mandating local governments control and reduce the amount of stormwater pollutant runoff into receiving waters through compliance with municipal stormwater permits issued under the National Pollutant Discharge Elimination System (NPDES); and

WHEREAS, under the authority of California Porter-Cologne Water Quality Control Act, the State Water Resources Control Board delegated authority to the Regional Water Quality Control Boards to issue NPDES permitting requirements upon counties and cities; and

WHEREAS, in October 2009, the San Francisco Bay Regional Water Quality Control Board adopted a Municipal Regional Stormwater Permit (MRP) under the NPDES program; and

WHEREAS, the MRP includes specific requirements mandating municipalities adopt Integrated Pest Management policies to limit water quality impacts from municipal pest management activities; and

WHEREAS, the City of East Palo Alto seeks to protect the health and safety of its employees and the general public, the environment and water quality, as well as provide sustainable solutions for pest control, through the reduced use of pesticides on property owned or managed by the City to the maximum extent practicable; and

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of East Palo Alto that Integrated Pest Management Policy identified and attached, as Exhibit A to the Resolution, be adopted and implemented by all appropriate City of East Palo Alto departments and contractors.

Adopted at a meeting of the City Council on this 24th day of January, 2012 by the following vote:

AYES: WOODS, EVANS, ROMERO, ABRICA, MARTINEZ
NOES: 0
ABSENT: 0
ABSTAIN: 0

SIGNED:

Laura Martinez, Mayor

ATTEST:

ML Gordon, City Clerk

APPROVED AS TO FORM:

Kathleen A. Kane, City Attorney

Exhibit A

City of East Palo Alto

EFFECTIVE DATE:
REVISED DATE:
ADOPTED BY CITY COUNCIL:
PAGE 1 OF 3

SUBJECT: **INTEGRATED PEST MANANAGMENT POLICY**

I. GOAL

The City of East Palo Alto seeks to protect the health and safety of its employees and the general public, the environment and water quality, as well as to provide sustainable solutions for pest control through the reduced use of pesticides on property including buildings owned or managed by the City of East Palo Alto by applying Integrated Pesticide Management principles and techniques. The municipal regional stormwater permit requires that the City of East Palo Alto minimize reliance on pesticides that threaten water quality.

II. REQUIRED USE OF INTEGRATED PEST MANAGEMENT

Employees implementing pest management controls will use Integrated Pest Management (IPM) techniques that emphasize non-pesticide alternatives. Pesticides will only be used after careful consideration of non-chemical alternatives and then the least toxic chemicals that are effective shall be used. Pest control contractors hired by the City of East Palo Alto are required to implement IPM to control pests. This will be achieved by hiring only IPM-certified pest control contractors or by including contract specifications requiring contractors to implement IPM methods.

The City of East Palo Alto will establish written standard operating procedures for pesticide use to ensure implementation of this IPM policy and to require municipal employees and pest control contractors to comply with the standard operating procedures.

The City of East Palo Alto will track employee and contractor pesticide use and prepare an annual report summarizing pesticide use and evaluating

pest control activities performed consistent with the municipal regional stormwater permit's requirements.

The *City of East Palo Alto* will review its purchasing procedures, contracts or service agreements with pest control contractors and employee training practices to determine what changes, if any, need to be made to support the implementation of this IPM Policy.

The City of East Palo Alto will perform educational outreach and/or support Countywide or regional efforts to educate residential and commercial pesticide users on a) goals and techniques of IPM, and b) pesticide related water quality issues consistent with the municipal regional stormwater permit's requirements.

The IPM-based hierarchical decision making process that will be used to control pests will include the following:

1. Based on field observations evaluate locations and sites where pest problems commonly occur to determine pest population, size, occurrence, and natural enemy population, if present. Identify conditions that contribute to the development of pest populations, and decisions and practices that could be employed to manage pest populations
2. Design, construct, and maintain landscapes and buildings to reduce and eliminate pest habitats;
3. Modify management practices including watering, mulching, waste management, and food storage to discourage the development of pest population;
4. Modify pest ecosystems to reduce food, water sources, and harborage;
5. Prioritize the use of physical controls such as mowing weeds, using traps, and installing barriers;
6. Use biological controls to introduce or enhance a pests' natural enemies;
7. When pest populations reach treatment thresholds (based on how much biological, aesthetic, economic or other damage is tolerable) non-pesticide management activities will be evaluated before considering the use of pesticides;
8. When pesticides are necessary, select reduced risk pesticides and use the minimum amounts needed to be effective;

9. Apply pesticides at the most effective treatment time, based on pest biology, monitoring, and other variables, such as weather, seasonal changes in wildlife use, and local conditions; and
10. Whenever possible, use pesticide application methods, such as containerized baits, that minimize opportunities for mobilization of the pesticide in stormwater runoff.

Departments performing pest management activities will identify an IPM coordinator who is responsible for assisting staff with implementation of this IPM policy.

III. BACKGROUND

Pesticides are defined as: any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. Pests can be insects, rodents and other animals, unwanted plants (weeds), bacteria or fungi. The term pesticide applies to herbicides, fungicides, insecticides, rodenticides, molluscicides and other substances used to control pests.

Integrated Pest Management (IPM) 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. Pesticides are used only after monitoring indicates they are needed according to established guidelines, and treatments are made with the goal of removing only the target organism. Pest control materials are selected and applied in a manner that minimizes risks to human health, beneficial and nontarget organisms, and the environment.

IPM techniques could include biological controls (e.g., ladybugs and other natural enemies or predators); physical or mechanical controls (e.g., hand labor or mowing, caulking entry points to buildings); cultural controls (e.g., mulching, alternative plant type selection, and enhanced cleaning and containment of food sources in buildings); and reduced risk chemical controls (e.g., soaps or oils).

City of East Palo Alto owned or managed property/facility includes but is not limited to parks and open space, golf courses, roadsides, landscaped medians, flood control channels and other outdoor areas, as well as municipal buildings and structures.

CITY COUNCIL/REDEVELOPMENT AGENCY

TUESDAY JANUARY 24, 2012

ITEM No. 20

POLICY & ACTION

City's
Integrated Pest Management Policy

(John Doughty, Community Development Director;
Michelle Daher, NPDES Coordinator)

RECOMMENDATION:

Adopt a Resolution approving the City's Integrated Pest Management Policy.

CITY OF EAST PALO ALTO

COMMUNITY DEVELOPMENT DEPARTMENT

1960 Tate Street • East Palo Alto, CA 94303

Date: January 24, 2012

To: Honorable Mayor and Members of the City Council

Via: ML Gordon, City Manager

From: John Doughty, Community Development Director
Michelle Daher, NPDES Coordinator

Subject: City's Integrated Pest Management Policy

RECOMMENDATION:

Staff Recommends that City Council:
Adopt a Resolution approving the City's Integrated Pest Management Policy.

ALIGNMENT WITH CITY COUNCIL STRATEGIC PLAN:

The recommendation is aligned with the following City Council priorities:

- Priority #1 *Enhance Public Safety and Emergency Preparedness*
- Priority #4 *Improve Public Facilities and Infrastructure*
- Priority #6 *Create a Healthy and Safe Community*

BACKGROUND:

In 2003, the City of East Palo Alto was required to adopt an integrated pest management (IPM) policy in accordance with the State's 1999 stormwater requirements to develop performance standards for municipal pest management. The original 2003 policy was based on a template developed by the San Mateo Countywide Water Pollution Prevention Program (Countywide Program) and was adopted by most jurisdictions in the County. The City of East Palo Alto has not formally adopted such policy or related ordinances, although staff has informally been following the protocols.

The San Francisco Bay Regional Water Quality Control Board (Water Board) adopted a municipal regional stormwater permit (MRP) in October 2009, requiring the City of East Palo Alto and each of the other 75 public agencies, covered by the Municipal National Pollutant Discharge Elimination System Regional Permit (MRP), to implement pesticide control programs to minimize reliance on pesticides which pose a threat to water quality and require Integrated Pest Management (IPM) in municipal operations and on municipal property (MRP Provision C.9).

The City of East Palo Alto was required to submit its existing IPM policy to the Water Board as part of its annual stormwater report in September 2010, but failed to provide

such a report due to the lack of an adopted policy. Based on the City of East Palo Alto's commitment to establish a Clean Bay Program, the San Francisco Regional Water Quality Control Board (Water Board) staff, which serves to ensure municipal compliance, *indicated in* a September 15, 2011 MRP Annual Report that the City of East Palo Alto's "Schedule of Implementation" (Schedule) was an acceptable plan to meet the Clean Water Act requirements and postponed action on violations based on the proposed Schedule. This Schedule requires adoption of an Integrated Pest Management Policy prior to January 31, 2012. The IPM Policy has been designed by the San Mateo County Clean Water Program to meet the MRP's requirements expressed as concise requirements. Water Board staff expressed its intent to issue Notices of Violation to municipalities that do not adopt updated IPM policies.

In response to these reported deficiencies, the Countywide Program's Parks Maintenance and IPM Work Group (with which City of East Palo Alto staff participates) developed the model IPM policy proposed, incorporating input from both the San Mateo County Agricultural Commissioner and Water Board staff.

ANALYSIS:

The primary goal of this policy is to indicate that in the City of East Palo Alto, Integrated Pest Management is not a recommended activity, but a description of the City's commitment to minimize the use of pesticides that have been identified as a threat to water quality.

This IPM policy incorporates ten steps that will be followed to control pests through a process that includes pest prevention, biological and habitat controls, and chemical controls when needed using reduced risk pesticides at the minimum amounts needed to be effective.

In addition, the MRP's requirements that are included in the IPM policy include the following:

1. Clearly indicate that the pesticides of concern are those that threaten water quality. The MRP contains a list of these pesticides.
2. Commit the City of East Palo Alto to establish written standard operating procedures (SOPs) for pesticide use to ensure implementation of the IPM policy and to require employees and pest control contractors to comply with the standard operating procedures.
3. Track the use of pesticides and summarize this information in the annual municipal stormwater report consistent with the MRP's requirements.
4. Review purchasing procedures and service agreements with pest control contractors to determine what changes, if any, may be needed to support the implementation of the IPM policy.

In accordance with Item 2, above, the Countywide Program's Parks Maintenance and IPM Workgroup developed written standard operating procedures for pesticide use that have been customized for use by the City of East Palo Alto. The City of East Palo Alto NPDES Coordinator has already implemented these procedures through collaborative

effort with Maintenance Management and the pest control contractors which serve City properties. Also, at the suggestion of Water Board staff and similar to other IPM policies adopted in the Bay Area, the IPM policy states that each department that performs pest management activities will identify an IPM coordinator who will be responsible for assisting staff to implement the city's IPM policy and to obtain training. Pertinent staff includes the Maintenance Division Manager in cooperation with the NPDES Coordinator. Registration of appropriate municipal staff has already occurred with the commitment of the Maintenance Manager.

FISCAL IMPACT:

The costs associated with adopting and implementing the updated IPM policy are considered to be negligible because the City already integrated this policy through contract revisions with the current pest control company serving the City. If adopted, future contracts shall be revised to include this policy. As of this date, the City of East Palo Alto's hierarchical pest control decision-making process is clear and consistent with the MRP requirements. By adopting an updated policy meeting MRP requirements, the City of East Palo Alto will likely avoid imminent enforcement actions and financial penalties.

Attachment:

Attachment A – Resolution including Exhibit A--City of East Palo Alto Integrated Pest Management (IPM) Policy

C.9 Attachment

Signed by EPA IPM Contract w Terminix

Terminix International
2343/ Mountain View
733 N. Pastoria Ave
Sunnyvale, CA 94085
(408) 522-0100

Jay Farr
City of East Palo Alto
150 Tara Street
East Palo Alto, California 94303

Dear Jay Farr:

Thank you for the opportunity to present this proposal for pest management services for City of East Palo Alto.

Since 1927, Terminix Commercial has become the company more businesses trust than any other for pest control. Experience in providing excellent service is a necessity for any pest control provider - and Terminix Commercial has built a rock-solid reputation on providing service to your industry. But there's more to our story. We've forged long-term relationships with customers in your business who look to us for effective, individualized solutions. They know that we understand their specialized regulations and paperwork down to the smallest detail. And most importantly, they know that they can rely upon us for value, timeliness and reliability every time.

The fact is, these principles are so important that we've made them the foundation of a Guarantee that's the strongest in the industry: our No Wait, No Doubt, No Limit 3-Point Guarantee. Within this proposal, you'll find more information and details on our guarantee.

Please take a moment to review the recommendations and Service Agreement we've created especially for you. If there are any questions we can answer or if you would like to meet to discuss this program - please give me a call at (408) 522-0100. We're here to help.

Sincerely,

_____

DAVID M CLARE
MGR BRANCH
(408) 522-0100
dclare@terminix.com

Terminix Commercial
City of East Palo Alto
150 Tara Street
East Palo Alto, CA 94303

Terminix Service
Terminix will perform Pest Control, Rodent Control, Fly Control and Bird Control for City of East Palo Alto for a period of 1 Year for the following pests at the locations, frequency and price as described in this Agreement.

- American Cockroaches
- German Cockroaches
- Oriental Cockroaches
- Smoky Brown Cockroaches
- House Mouse
- Norway Rat
- Roof Rat
- Centipedes
- Crickets
- Earwigs
- Ground Beetles
- Millipedes
- Silverfish
- Sowbugs/Pillbugs
- Spiders
- Black Widow Spider
- Brown Recluse Spider
- Wolf Spiders

*Termites, fire ants, carpenter and pharaoh ants, as well as wood destroying organisms are NOT included in this service. For information on these services call 1-800-TERMINIX.

Terminix will retreat for the pests identified above at no charge between scheduled service visits.

Treatment Location

1	**Address**	150 Tara Street 150 Tara Street East Palo Alto, CA 94303
	Contact	Jay Farr Email: jfarr@epa.org
	Service Frequency	Monthly (12 service visits)
	Charges	Initial Charge: $160 Recurring Charge: $80
	Annual Location Total	$1,040

Total Annual Amount: $1,040 (Grand Total)

*Cost does not include any applicable sales tax.

*You may recognize a 3% discount for pre-paying one years service charge in advance

Easy Pay Feature **Signature Required** _____
I understand that by enrolling my account for Easy Pay, all future invoices sent to me by Terminix for services performed pursuant to my contract will automatically be paid by a deduction from my checking, savings or credit card account as indicated.

☐ Credit Card (if different from above) ☐ Checking Account* (Voided Check Attached)

Credit Card # ___ ___ ___ ___ - ___ ___ ___ ___ - ___ ___ ___ ___ - ___ ___ ___ ___ Expiration Date ___ ___ / ___ ___ (mm/yy)
If Easy Pay is selected – a copy of agreement must be sent to Corporate at 860 Ridge Lake Boulevard, Memphis, TN 38120 Mailstop C2-4092
*See terms and conditions for details

This agreement is subject to the Terms and Conditions, including the Mandatory Arbitration provision.

This agreement is for an initial period of 1 Year from the date of the first service and, unless cancelled by the Purchaser, will automatically continue on a monthly basis until cancelled by either party upon thirty (30) days notice. This agreement is not valid unless accepted by customer within 30 days of submission.

In the event you have any questions or complaints, you may contact a Terminix representative by calling 1-800-TERMINIX (1-800-837-6464).

PAYMENT

TERMS: Applicable charges and sales tax will be paid within thirty (30) days of invoice. A charge of 1.5% per month will be added to any unpaid balance over 30 days.

Unless otherwise noted, Purchaser accepts centralized invoice to be provided each month. Summary invoices do not contain copies of service receipts.

TERMS AND CONDITIONS

1. MATERIALS.
   A. The materials used in pest control service will comply with federal, state and local laws, and shall be acceptable to you.
   B. All pest control service shall be performed in accordance with the most effective scientific pest control procedures.
2. YOUR COOPERATION.
   A. Your cooperation is important to ensure the most effective results from Terminix service. Whenever conditions conducive to the breeding and harborage of pests covered by this contract are reported in writing by Terminix, and are not corrected by you, Terminix cannot assure satisfactory service.
   B. If the conditions noted by Terminix are not corrected as required, all guarantees in this agreement shall automatically terminate and be cancelled. Further, additional treatments in areas of such conditions that are not corrected as required shall be paid for by the customer as an extra charge.
3. INSURANCE. Terminix will furnish a Certificate of Insurance upon request.
4. TERMS OF AGREEMENT. If Terminix fails to comply with the specifications, they shall be given thirty (30) days notice to correct the problem. If, at the expiration of such thirty (30) days, the unsatisfactory conditions have not been corrected, you reserve the right to cancel the contract. In the event of persistent infestation, Terminix will provide special services at no extra cost until the condition is under control. Terminix is not responsible for insect or rodent damage to products or contents at the premises. This agreement does not provide for control of termites, other wood destroying organisms, or any other pests not specified.
5. NOTICE OF CLAIMS. Any claim under the terms of this agreement must be made immediately in writing to any Terminix Service Center.
6. DISCLAIMER.
   A. Terminix's liability under this agreement will be terminated if Terminix is prevented from fulfilling its responsibilities under the terms of this agreement by reason of delays in transportation, shortages of fuel and/or materials, strikes, embargoes, fire, floods, quarantine restrictions, earthquakes, hurricanes, or any other act of God or circumstances or cause beyond the control of Terminix.
   B. EXCEPT AS OTHERWISE PROHIBITED BY LAW, TERMINIX DISCLAIMS AND SHALL NOT BE RESPONSIBLE FOR ANY LIABILITY FOR DIRECT, INDIRECT, SPECIAL, INCIDENTAL, CONSEQUENTIAL, EXEMPLARY, PUNITIVE, STIGMA AND/OR LOSS OF ENJOYMENT DAMAGES. THE OBLIGATIONS OF TERMINIX SPECIFICALLY STATED IN THIS AGREEMENT ARE GIVEN IN LIEU OF ANY OTHER OBLIGATION OR RESPONSIBILITY, EXPRESS OR IMPLIED, INCLUDING ANY REPRESENTATION OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.
7. CHANGE IN LAW. Terminix performs its services in accordance with the law. In the event of a change in existing law as it pertains to the services promised herein, Terminix reserves the right to revise the monthly service charge or terminate this agreement.
8. NON-PAYMENT, DEFAULT. In case of non-payment or default by the Purchaser, Terminix has the right to terminate this agreement and reasonable attorney's fees and costs of collection shall be paid by the Purchaser.
9. CHANGE IN TERMS. At the time of any renewal of this agreement, Terminix may change this agreement by adding, deleting or modifying any provision. Terminix will notify the Purchaser in advance of any such change, and Purchaser may decline to accept such a change by declining to renew this agreement. Renewal of this agreement will constitute acceptance of any such changes.
10. ENTIRE AGREEMENT. This agreement constitutes the entire agreement between the parties and no other representations or statements will be binding upon the parties.
11. MANDATORY ARBITRATION. Purchaser and Terminix agree that any claim, dispute or controversy ("Claim") between them or against the other or the employees, agents or assigns of the other, and any Claim arising from or relating to this agreement or the relationships which result from this agreement, including but not limited to any tort or statutory Claim, shall be resolved by neutral binding arbitration by the American Arbitration Association ("AAA"), under the Rules of the AAA in effect at the time the Claim is filed ("AAA Rules"). In the event the AAA is unwilling or unable to arbitrate the dispute, the parties shall arbitrate in accordance with the Federal Arbitration Act, 9 U.S.C. §§ 1-14. Any arbitration hearing at which the parties appear personally will take place at a location within the United States federal judicial district in which Purchaser resides. AAA Rules and forms may be obtained and all claims shall be filed at any AAA office, www.adr.org or by calling 1-800-778-7879. Each party shall be responsible for paying its own attorneys' fees, costs and expenses; the arbitration fees and arbitrator compensation shall be payable as provided in the AAA Rules. However, for a Claim of $15,000 or less brought by Purchaser in his/her/its individual capacity, if Purchaser so requests in writing, Terminix will pay Purchaser's arbitration fees and arbitrator compensation due to the AAA for such Claim to the extent they exceed any filing fees that the Purchaser would pay to a court with jurisdiction over the Claim. The arbitrator's power to conduct any arbitration proceeding under this arbitration agreement shall be limited as follows: any arbitration proceeding under this agreement will not be consolidated or joined with any arbitration proceeding under any other agreement, or involving any other

property or premises, and will not proceed as a class action or private attorney general action. The foregoing prohibition on consolidated, class action and private attorney general arbitrations is an essential and integral part of this arbitration clause and is not severable from the remainder of the clause. The decision of the arbitrator shall be a final and binding resolution of the Claim. This arbitration agreement is made pursuant to a transaction involving interstate commerce and shall be governed by the Federal Arbitration Act, 9 U.S.C. Sections 1-16. Judgment upon the award may be entered in any court having jurisdiction. Neither party shall sue the other party with respect to any matter in dispute between the parties other than for enforcement of this arbitration agreement or of the arbitrator's award. THE PARTIES UNDERSTAND THAT THEY WOULD HAVE HAD A RIGHT OR OPPORTUNITY TO LITIGATE DISPUTES THROUGH A COURT AND TO HAVE A JUDGE OR JURY DECIDE THEIR CASE, BUT THEY CHOOSE TO HAVE ANY DISPUTES DECIDED THROUGH ARBITRATION.

12. SEVERABILITY. If any part of this agreement is held to be invalid or unenforceable for any reason, the remaining terms and conditions of this agreement shall remain in full force and effect.
13. GUARANTEE OF CUSTOMER SATISFACTION. We will answer your call anytime, day or night. We will perform your service or schedule an appointment within 24 hours after receiving your call. We will be on time. We will do the job right the first time, or we will do it over. We will show we care by our professional appearance and manner, and by the products and procedures we use. We will perform all services at your convenience to avoid any interruption to your normal operations.

By signing within thirty (30) days of the date below, Purchaser accepts our offer of Pest Control, Rodent Control, Fly Control and Bird Control on the Terms and Conditions identified herein.

THE TERMINIX INTERNATIONAL COMPANY, L.P.

By: _____

Title: _____

Date: _____

City of East Palo Alto JOHN DOUGHTY FOR
Jay Farr

By: _____

Title: C.D. Director

Date: 6/12/12

INTEGRATED PEST MANAGEMENT AND SCOPE OF SERVICE

The Integrated Pest Management Solution

At Terminix Commercial, we believe the best way to solve pest problems is to correct the conditions that contribute to them. Following the procedures of the Integrated Pest Management (IPM) program, we focus our approach to treatment on eliminating pests, their harborage areas and their entry points to your facility to provide maximum effectiveness with minimal treatment.

IPM is a low or non-chemical alternative of controlling pests through the cooperative teamwork of your business and Terminix Commercial through improving sanitation awareness, proper building exclusion, and low or non-chemical methods of treatment to eliminate a pest infestation to protect the health and safety of employees and the environment.

Components of the Terminix Commercial IPM program include:

- Inspection of your facility and its exterior surroundings
- Identification of the types of pests present
- Identification and investigation of conditions that contribute to infestations
- Analysis of current pest activity
- Recommendations for limiting and preventing future infestations
- Implementation of mechanical methods for controlling pests
- Application of highly targeted treatments
- Continuous evaluation and fine-tuning of service to meet future needs
- Education of your staff about actions that contribute to pest activity

Non-chemical Pest Control Methods. Terminix uses non-chemical pest control methods where these are feasible and efficacious. These include:

- Sanitation (removing food & water sources)
- Exclusion
- Harborage Removal
- Harborage Denial
- Trapping & Monitoring
- Vacuuming
- Lighting

1. Sanitation: Sanitation involves cleaning up and/or removing potential food and water sources for pests. The fewer food sources that are present, the fewer pests that can survive. Even something as simple as picking up a lemon that has rolled under a table can prevent a significant fruit fly infestation. A regular schedule of cleaning floors, equipment, floor drains, trash receptacles and dumpsters is the best

approach to minimize food sources for pests. Water leaks should be repaired promptly, and wet mops should be hung up to dry properly.

2. Exclusion: Sealing up cracks and holes where pests can enter is the most effective non-chemical method to prevent pests from invading a building. It is impossible, for example, to keep a building free of mouse activity if the doors do not have proper weatherstrips. It is important to keep outer doors closed or install tight-fitting screen or storm doors.
3. Harborage Removal: The less shelter that is available, the fewer number of pests that will be able to survive. Removing piles of debris, cutting tall weeds and eliminating cardboard boxes in storage rooms are examples of harborage removal.
4. Harborage Denial: If a harborage cannot be removed, e.g., cracks in interior walls where cockroaches could live, then steps should be taken to deny the pest use of that harborage. The most common procedure used to deny harborages is caulking cracks that may be present - both inside and outside.
5. Environmental Alteration: Changing the environmental conditions of a room or area so that pests cannot survive there can be an effective long-term strategy. For example, a wet crawlspace under a building can serve as a source of infestation for many different types of pests. Installing ventilators and vapor barriers to dry out the crawlspace prevents most pests from living under the building.
6. Interception: When building occupants or workers examine goods and items for pests as they are brought into the building, they often can prevent numerous introductions of pests, especially German cockroaches. This is especially important for food items, in particular bagged or boxed produce.
7. Trapping & Monitoring: Rodents can be effectively controlled in many situations using traps alone. Flying insects can be controlled with properly placed insect light traps in conjunction with good sanitation and exclusion practices. For insect control, traps work best for monitoring activity of insects and other arthropod pests.
8. Vacuuming: Physical removal of pests by vacuuming is rapidly gaining wide acceptance. This technique is especially effective for cockroach and spider control.
9. Heat & Freezing: Heat is currently being effectively used by Terminix in Florida and California to control termites and wood-boring beetles in structures in a process called CleanHeat. Terminix is also using heat in some situations to "flush" cockroaches out of their harborages. By combining vacuuming with flushing insects with hot air, pest control can effectively be accomplished in some situations without occupants having to vacate the area. Items (e.g., food) that are thought to be infested may be frozen at zero degrees Fahrenheit for at least 6 days - if the items can safely be frozen.
10. Lighting: Exterior lights often attract large numbers of nighttime flying insects to buildings where they can enter the building. These insects also serve as food for spiders, which promotes spider infestations. Exterior lighting should always be changed to sodium vapor lamps where feasible to attract as few insects as possible to a building.

Contributing Conditions. At the heart of an effort to minimize pesticide usage and still maintain a relatively pest-free environment is the correction or elimination of conditions that may be contributing to a pest infestation. All pests need food, water, and shelter to survive. The less of these available to pests, the fewer number of pests that can survive in a given area.

In most cases, it is impossible to remove all of the food, water and shelter sources available to pests. A certain number of pests from the pest population will typically be able to survive.

Cleaning up food debris, fixing leaks and removing potential harborages accomplishes lowering the population size so that it will be easier to control the infestation while using a minimum of insecticide applications.

Facility Cooperation - Achieving goals of an IPM concept are difficult unless the facility provides its full cooperation in correcting the contributing conditions pointed out by the pest management professional. The longer these contributing conditions are allowed to persist, the greater the need to use pesticides to produce the goal of a pest-free environment.

Non-residual Pesticide Applications. Many people believe that IPM means that pesticides will not be used; however, IPM does not preclude the use of pesticides. In some cases, pesticides will need to be implemented, while in other cases, pesticides may not be needed at all. Every situation is different and the Terminix service professional is the person who must analyze the situation and choose the appropriate control measure including when and where to use pesticides.

If a pesticide application is required, "low impact" products or non-residual pesticides with acceptable efficacy should be chosen for IPM programs. Low impact insecticides include baits, naturally occurring materials such as boric acid and silica aerogel dusts, and pyrethroids. These materials generally have very low mammalian toxicity and still remain very effective at controlling insects and other arthropod pests.

Cultural Recommendation

Terminix should provide a written sanitation report following each service outlining recommendations for addressing contributing conditions that may be present. To reduce the need for pesticide use, these recommendations should be corrected within a reasonable time frame. The following list details general recommendations the Terminix service professional may offer the staff of a facility.

- Keep stored food products refrigerated or in tightly sealed containers.
- Dispose of packing materials, such as grocery bags, cardboard boxes, pallets and shipping boxes that may harbor pests.
- Change food suppliers to avoid future infestations.
- Identify and isolate foods infrequently used that have been a source of pest infestations.
- Upgrade food storage, waste handling and cleaning programs to reduce foods available to pests.
- Store goods on shelves away from walls to allow for cleaning behind them.
- Clean exterior and interior of ovens and hoods before grease buildups occur.
- Avoid leaving food and soiled dishes exposed overnight.
- Keep indoor garbage in lined and covered containers. Empty daily.
- Inspect for and clean up spills in trash rooms and around dumpsters.
- Monitor trash containers frequently and keep clean with fresh trash liners.

- Keep dumpster lids closed and drain plugs in place.
- Empty and clean recycling bins frequently.
- Empty mop buckets and remove sour rags from janitorial closets.
- Clean and screen floor drains.
- Regularly vacuum carpets, curtains, and upholstery.
- Remove lint accumulations from the edges of carpets, crevices, between floorboards, air ducts and registers.
- Remove unnecessary charts and crevices in exterior walls.
- Mount sinks and other fixtures away from walls to facilitate cleaning.
- Install tight exterior doors and loading dock doors fitted with anti-pest tension strips or sweeps and keep doors shut when not in use.
- Caulk crevices around doors, windows, vents, and other openings.
- Install insect proof screens on windows, vents, and other openings.
- Repair plumbing and roof leaks and reduce condensation problems.
- Drain puddles, including drip zones under air conditioners.
- Clean gutter and drains.
- Eliminate bird roosting sites and old nests in which pests can breed.
- Trim or remove foundation plantings, vines, and overhanging trees to reduce pest harborages and entry routes and to reduce moisture levels around the foundation.
- Keep grass short to remove cover for pests.
- Substitute trickle irrigation for overhead watering of trees and shrubs.
- Reduce the number of foundation plants, especially flowering perennials that attract pests.
- Avoid bringing insect-infested flowers indoors.
- Substitute crushed shells, stone, or gravel for bark or other organic mulches.
- Leave a bare strip of gravel or concrete around foundations to discourage invasion by outdoor pests.
- Use sodium vapor lamps outside to attract fewer flying insects.
- Move exterior lighting away from the building.
- Keep all exterior electrocuting-type light traps at least 50 feet from the building.
- Crumbs from lunches and snacks eaten outside of normal dining areas create feeding opportunities for pests in other sites.
- Insecticides used by occupants or maintenance personnel may scatter pests into new areas.
- Recently painted walls may cause pests to move to new areas because of temporary irritation from fumes.

The Terminix service professional may be able to do some minor physical exclusion control procedures, such as sealing some cracks and holes. Extensive cleaning, plumbing repair, improving ventilation, or extensive removal of vegetation is not the responsibility of Terminix.

Focus of an IPM Program
Successful IPM programs require a partnership. The success of an IPM program depends to a large degree on the level of cooperation the client staff provides. Terminix may perform training sessions for building maintenance personnel and workers, upon request. If desired, educational materials in the form of articles for in-house newsletters, notices for bulletin boards or flyers can be supplied for distribution.

The IPM Survey. Because each building and its conditions are unique, an initial IPM survey may need to be performed on the building to determine its pests control needs. The purpose of this survey is to:

- Identify which pests are present and where they are active,
- Identify contributing conditions,
- Determine which pest control strategies are needed,
- Determine the high risk areas for pest activity, and
- Determine where pesticide applications will be necessary.

A graph or a copy of the floor plans should be included with each IPM survey report noting the areas of pest activity and contributing conditions.

Inspections. Thorough inspections by trained personnel are a key part of an IPM program. Building exteriors should be inspected at least once each month. Periodic inspections on the roofs of some flat roof buildings should be necessary, especially for some pest ant species. The primary focus of interior inspections should be the high risk areas for pest activity, such as food preparation or snack areas, restrooms, and other water sources, the perimeter building walls, and areas of previous pest activity.

The proportion of actual service time spent inspecting should vary according to the building type and pest activity found. For example, a small building with lush landscaping or large food preparation areas may require more service time than a larger office building without these conditions. Generally for an IPM program, up to 90% of the actual service time may be expected to involve inspection versus actual time spent applying pesticides.

Pest Sighting Log. In larger facilities, especially those with many employees, a pest sighting log should be established within a facility. A pest sighting log is important to allow the facility's employees to have a central office to contact for reporting pest activity. In some cases, multiple sight logs may be established, such as individual nurse's stations in hospitals. This log is used by the service professional to target areas that need immediate attention.

Floor Plans. Floor plans of larger facilities are crucial for planning and evaluating pest control programs. Prior to the initial IPM survey, Terminix should request a copy of the floor plans for each building in order to note areas of pest activity and contributing conditions that are present. The floor plans should also be helpful in determining the high risk and low risk areas for pest activity with the facility manager and the IPM coordinator for the local Terminix branch office. Locations of rodent control devices should be recorded on similar diagrams and stored in the on-site pest sighting log.

Monitoring. Un-baited "sticky" monitoring traps may be placed in key situations for pest activity to capture pests as they crawl along walls, in cabinets

and similar areas. The purpose of monitoring is to determine which pests, if any, are present, to determine the extent of activity, to pinpoint where pest harborages might be located, and to determine where pests may be entering.

In general, monitoring traps should be placed under sinks and in some storage areas. Other areas where monitoring traps should be placed include motor compartments of coolers and kitchen equipment and in cabinets or on shelves where items cannot be easily removed on a frequent basis. Monitoring traps may be secured to both vertical as well as horizontal surfaces.

The primary focus of monitoring should be for cockroaches. A secondary use of these traps may be for monitoring occasional invaders, including silverfish, earwigs, crickets and spiders. Although these arthropods may not be specifically targeted pests for the IPM program, their capture may provide useful information.

If employees report seeing some unidentified crawling arthropod, e.g., spiders, monitoring traps should be placed in those areas to capture specimens for identification. Depending on the situation, long-term monitoring may then be initiated and maintained.

Additional monitoring traps may be placed in other areas as an aid in follow-up evaluation of treatments, especially for cockroaches. For follow-up evaluations, monitoring traps may be baited with a food attractant, such as a bit of banana or a spot of peanut butter.

Another type of monitoring for ants is known as "pre-baiting." When ants such as crazy ants, ghost ants, and Pharaoh ants are not present in sufficient numbers to readily observe ant trails back to the colony's location, peanut butter, jelly, Karo syrup etc., (without toxicant) may be placed along likely ant trails. After 15-60 minutes, a significant ant trail is often readily visible that can be followed to the source of the infestation - the colony's location.

Monitoring traps should be replaced when they become dusty, damaged, or capture a number of pests. The numbers of pest captured and where they are captured may be recorded. This information may be of future benefit to the overall IPM program.

Pheromone Traps. Traps, which use a sex attractant pheromone, may be used to monitor some species of food infesting beetles or moths. Areas where these traps should be used are large food storage rooms or warehouses.

Insect Light Traps. Insect light traps (ILTs) utilize ultraviolet UV light waves to attract flies and other flying insects to traps where they should be captured. Electrocuting traps use an electric grid to "zap" insects while other ILTs do not "zap" the insects, but rather use a glue trap behind or under the UV lights to passively capture insects. Whether ILTs will be beneficial and where they might be placed should be determined for each building during the initial IPM survey or in response to a specific flying insect situation.

Rodent Control Devices. Several types of traps and rodenticide bait stations are the two types of devices used to control rodent infestations. To eliminate a rodent infestation, every rat or mouse must find and interact with a device and then commit to that device. To achieve this goal, a variety of control devices need to be used in every rodent control situation. Using only one type of trap or relying on rodenticide baits alone usually results in failure to eliminate a rodent infestation.

Your Industry

The presence of cockroaches, rodents, ants and other pests can have a negative impact on the way your business is viewed. That's why it is important to implement quick and effective solutions.

Your establishment is unlike any other. That's why we take into consideration its construction, maintenance details, and nature of the pest infestation into account in customizing pest management service procedures for your facility.

In addition, we work with your management and staff to help identify potential problem areas and the best ways to address them. We will make certain that you have the appropriate documentation, sanitation reports and recommendations needed to satisfy inspectors and regulatory officials.

And because we respect your relationships with your employees and customers, we will perform all work at the hour most convenient for you to avoid any disruptions to customers or staff.

Basic Pest Management Guidelines

The pest management services will begin with an inspection.

When pest activity is detected, non-chemical control techniques will be considered first. Treatments will typically involve low-impact products and formulations (e.g., baits, inorganic dusts) applied primarily into cracks and voids or inside stations.

To minimize the need for retreatment, it will be your primary responsibility to remove or correct conditions that create or contribute to a particular pest problem.

Each location's staff will be provided copies of the labels and MSDS for the products that may be applied on the property.

Should the state have a pesticide treatment notification requirement, Terminix Commercial will assist your business in meeting those requirements in accordance with the state (or local) regulations.

Exterior Service

Most structure-invading pests, such as ants, rodents and occasional invaders, usually originate from outside the building. As part of the service, Terminix may include one or more of the following:

- Inspection and possible treatment outside around exterior doors and other entryways.
- Complete exterior inspection and treatment of exterior pest harborages.
- Application of a perimeter treatment to the building foundation and adjacent ground area.

- Establishment and maintenance of exterior rodent control devices in accordance with the facility's specific standards and requirements, if any.

Conditions potentially contributing to pest infestations will be noted on the service report and discussed with the facility manager or contact person.

Smoky Brown Cockroaches, Oriental Cockroaches, American Cockroaches

Survey:
Conducted using visual inspection with flashlight and flushing agent (where applicable and permitted). Monitoring traps may also be employed in key areas.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management, if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of landscape mulch, trimming tree and shrub branches from touching building, improving drainage, and improving crawl space and attic ventilation.

Non-chemical Techniques:
Pestproofing where such is within the pest management professional's ability to implement. Physical removal using a HEPA-equipped vacuum when moderate to severe populations are found. Hot air generated by a heat gun device may be used to flush cockroaches to allow removal by vacuuming. Woods cockroach infestations may be minimized during summer by changing exterior lighting to sodium vapor lighting that attracts fewer flying insects.

Insecticide Treatments:
Applications for cockroach control will generally be limited primarily to crack, crevice void treatments using containerized cockroach baits, insect growth regulators or inorganic dust products such as boric acid or silica gel.

German Cockroaches

Survey:
Conducted using visual inspection with flashlight and flushing agent (where applicable and permitted). Monitoring traps may also be employed in key areas.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include removal of cardboard boxes, water leaks, presence of cracks, holes or entryways, and sanitation.

Non-chemical Techniques:
Physical removal using a HEPA-equipped vacuum when moderate to severe populations are found. Hot air generated by a heat gun device may be used to flush cockroaches to allow removal by vacuuming. Monitoring traps may be placed to capture cockroaches and to monitor for possible reinfestations.

Insecticide Treatments:
Applications for cockroach control will be limited primarily to crack & crevice and void treatments using gel cockroach baits or inorganic dust products. Spot treatments using a water-based residual product may be applied where necessary to control insects where crack & crevice or void treatments cannot be used. IGRs may be used in those facilities where regular re-introductions of German cockroaches are possible.

Roof Rat, Norway Rat, House Mouse

Survey:
Conducted using visual inspection with flashlight. Presence of rodents in traps will also be used to evaluate infestation.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include rodentproofing, proper storage practices, sanitation trash handling procedures, reduction of clutter, removal of potential harborages (e.g., piles of items), regular mowing of tall grass/weeds, and trimming of trees and shrubs near buildings.

Non-chemical Techniques:
Non-chemical techniques include: rodentproofing where such is within the pest management professional's ability to implement; trapping using a variety of traps including snap traps and multiple catch mouse traps and glue traps. Traps will be used primarily as a response to controlling active infestations. Multiple catch mouse traps may be employed in some situations as a preventative measure or as a monitoring tool. Such traps will be numbered and marked on a site plan.

In situations where traps cannot remain out in visible/accessible locations, such devices will be placed at night and retrieved the next morning prior to building beginning operations.

Rodenticide Use:
The use of rodenticides IS NOT included in the Terminix EcoControl protocols. If it becomes necessary to use rodenticides, authorization of the property owner or manager will be required on an "Emergency Waiver of Service". If rodenticides become necessary they will be placed only inside tamper-resistant stations and secured inside stations. Any stations permanently placed for preventative rodent control will be secured via patio blocks,

stakes, or other approved method. Permanent stations will be numbered and marked on a site plan. Stations used for remedial action for an active infestation will be placed for duration of control program and removed. Liquid rodenticides, if used, will be placed in approved liquid rodenticide stations and placed at night during times of rodent activity or in such a manner that they are in accessible to nontarget animals and children. Such stations will be retrieved during daytime hours.

In situations where stations cannot remain out in visible locations, such devices will be placed at night and retrieved the next morning prior to building beginning operations.

Sowbugs/Pillbugs, Silverfish, Millipedes, Ground Beetles, Earwigs, Crickets, Centipedes

Survey:
Conducted using visual inspection with flashlight. Monitoring traps may be used.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of landscape mulch, trimming and shrub branches from touching building, improving drainage, and improving crawlspace ventilation.

Non-chemical Techniques:
Pestproofing where such is within the pest management professional's ability to implement. Switching exterior lamp types to those that attract fewer flying insects, crickets and ground beetles (low-pressure sodium vapor or yellow lights). Vacuuming may be employed to remove arthopods concentrated in exposed areas indoors, such as earwigs and millipedes. Pitfall traps may be used along exterior foundations to monitor for crawling pests.

Insecticide Treatments:
Outdoors, as pests are exposed beneath items, within mulch, etc., they may be treated using spot treatment with a water-based residual product. Crickets outdoors may be treated using a granular insect bait.

Indoors, pests that crawl along baseboards, such as crickets, earwigs and millipedes, may be treated by use of monitoring traps and/or limited spot treatments applied to baseboards in darkened areas behind furniture where such pests are known to be active. Pests residing within voids may be treated by drilling and injection of a dust product. Pests found to be harboring in cracks may be treated using a dust product.

Spiders

Survey:
Conducted using visual inspection with flashlight.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of landscape mulch, trimming tree and shrub branches from touching the building, improving drainage, and improving crawlspace and attic ventilation. Switching exterior lamp types to those that attract fewer flying insects that serve as food for spiders (low-pressure sodium vapor or yellow lights) is recommended. Doors should remain closed or be screened to limit the entry of spiders and the flying insects on which they prey.

Non-chemical Techniques:
Spiders, webbing, and egg sacs may be used by use of a web duster or vacuum.

Insecticide Treatments:
Spot treatments using a water-based residual product may be applied into corners and along the inside of interior overhead doors where web-building spiders are active. Such treatments do not generally control all spiders, but combined with regular removal by sweeping or vacuuming, the numbers of web-building spiders can be markedly reduced.

Outdoors, spot treatments to corners and other sites where spiders build webs can be beneficial in spider reduction, especially when combined with regular removal by sweeping or vacuuming.

In large warehouses and similar situation where web-building spiders are found high above the floor, the spiders are best controlled through physical removal using a lift to gain access to the areas of activity. Where lifts are not possible or feasible, a volumetric (ULV) treatment of the entire interior space can kill many, if not most of the spiders. Such treatments are offered by Terminix at an additional charge according to the situation.

Black Widow Spider

Survey:
Conducted using visual inspection with flashlight.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of

landscape mulch, trimming tree and shrub branches from touching the building, improving drainage, and improving crawlspace and attic ventilation. Switching exterior lamp types to those that attract fewer flying insects that serve as food for spiders (low-pressure sodium vapor or yellow lights) is recommended. Doors should remain closed or be screened to limit the entry of spiders and the flying insects on which they prey.

Non-chemical Techniques:
Black widow spiders, webbing and egg sacs may be removed by use of a vacuum.

Insecticide Treatments:
Direct treatment may be applied to black widow spiders where they are found using a nonresidual aerosol or a water-based residual product.

Spot treatments using a water-based residual product may also be applied into corners and along the inside of interior overhead doors where black widow spiders are active. Long term, such treatments may not totally prevent all black widow spiders inside, but combined with reduction of available harborages outside and installation of screening over vents and other exclusion efforts, the numbers of spiders found inside should be minimized. Regular inspections and treatments as needed outdoors are often necessary where black widow spider activity is recurrent outdoors.

Outdoors, reduction of potential harborages and regular inspections and possible spot treatments to corners and other sites where spiders build webs can be beneficial in minimizing this spider.

In large warehouses and similar situation where web-building spiders are found high above the floor, the spiders are best controlled through physical removal using a lift to gain access to the areas of activity. Where lifts are not possible or feasible, a volumetric (ULV) treatment of the entire interior space can kill many, if not most of the spiders. Such treatments are offered by Terminix at an additional charge according to the situation.

Brown Recluse Spider

Survey:
Conducted using visual inspection with flashlight. Monitoring traps are typically used to determine if the brown recluse spider is actually present, and, if so, the extent of the infestation.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of landscape mulch, trimming tree and shrub branches from touching the building, improving drainage, and improving crawlspace and attic ventilation.

Non-chemical Techniques:
A vacuum may be used to remove spiders as they are discovered during the inspection. Monitoring traps may be liberally placed to capture as many spiders as possible (where such traps can be securely placed).

Insecticide Treatments:
The brown recluse spider may be the most difficult spider to control and total elimination is often not possible, especially in older buildings. Brown recluse spiders can be minimized by implementing recommendations to address contributing conditions as outlined by the service professional and by treatments applied in areas of activity.

General steps that may be beneficial in limiting brown recluse spiders include the following:

- The facility should be advised to eliminate as much clutter as possible in storage areas.
- Accessible wall outlet plates may be removed and the voids behind them treated with a residual dust product.
- Cracks behind window and doorframes, under baseboards, and in walls above false ceiling may be treated with a residual dust product.
- Accessible voids where plumbing enters the walls may be treated with a residual dust treatment.
- If an attic is present and is accessible, it should be inspected for brown recluse spider activity. If spiders are found under insulation, many may be removed by vacuuming. Insulation may need to be lifted and dust applied underneath in those areas where spiders are found.
- Spot treatments with a water-based residual product may be applied to baseboards in darkened areas behind and under heavy furniture, appliances, etc.
- Application of a water-based residual product may also be applied to the exterior foundation.
- Accessible exterior cracks and openings should be treated with a residual dust product and sealed by the facility's maintenance staff.
- Weep holes may be plugged after treatment with pieces of wire mesh to exclude spiders.

Wolf Spiders

Survey:
Conducted using visual inspection with flashlight. Monitoring traps may be used.

Contributing Conditions:
Where noted during service surveys, recommendation for correction of conditions possibly contributing to infestations will be made in writing and discussed with facility management if person is available. Examples include sealing exterior cracks and other openings, minimizing heavy ground-covering vegetation next to foundations, removal of piles of items and other items that might provide harborage sites, reducing thick layers of landscape mulch, trimming tree and shrub branches from touching the building, improving drainage, and improving crawlspace and attic ventilation. Switching exterior lamp types to those that attract fewer flying insects that serve as food for spiders (low-pressure sodium vapor or yellow lights) is recommended.

Non-chemical Techniques:
Pestproofing where such is within the pest management professional's ability to implement. Placement of monitoring traps behind and under furniture to potentially capture spiders as they crawl inside.

Insecticide Treatments:
Outdoors, a perimeter treatment to the foundation may be applied in cases where wolf or ground spiders are regularly invading a particular facility.

In some cases indoors, these spiders may be treated by use of monitoring traps and/or limited spot treatments applied to baseboards in darkened areas behind furniture where such spiders are known to be active. Spiders found to be harboring in cracks may be treated using a dust product.

Safety/Security of Terminix

Terminix is committed to conducting the operations of the business in a manner that protects both human health and the environment while complying with all applicable federal, state, and local laws and regulations. The commitment if reflected in Standard Operating Procedures from a Safety and Loss Manual kept in each branch location. It covers general guidelines for on the job safety to procedures for responding to emergencies involving chemicals. It provides the necessary guidance to help Branch Management personnel ensure the protection of their employees, customers, their neighbors, and the environment.

Terminix requires the cooperation of each employee to ensure a safe and healthy work areas which includes using the correct products for the job and following safe work practices; it is required they shared the corporate commitment to integrate safety and security control into all of their daily activities.

Terminix Branch Mangers are responsible for implementing and adhering to the Standard Operating Procedures and Guidelines outlined in the Safety and loss Manual. Supervisors receive training regarding all policies and employees are trained on the policies.

As part of the commitment, Terminix promotes a drug-free workplace and has an established Policy on the use or abuse of alcohol and drugs by their employees. To maintain the high professional standards of the Company's workforce, the company also obtains criminal background checks on applicants and employees.

Employees who hold Commercial Driver's Licenses or and operate vehicles that are subject to D.O.T. guidelines are also required to meet and adhere to those D.O.T. guidelines.

Branch safety meetings are held to train employees on safe working procedures. These are to last 10 to 15 minutes on a weekly basis and are incorporated in to the weekly service technician's training session.

Terminix requires employees to wear certain uniforms and use certain types of equipment based upon the job classification. They are instructed on the caring for uniforms and procedures for preventing personal injury and exposure through proper use of Personal Protective Equipment (PPE). These guidelines comply with the OSHA Hazard Communication Program and are part of the initial training and regular review process.

Guidelines and procedures for handling chemicals in the day-to-day operations are in strict compliance with Federal Government requirements for handling and storing chemicals used in the workplace and at application sites. All containers and mixes are required to have the appropriate label affixed. In addition, procedures are in place for responding to emergency chemical spills; this includes containment, notification, cleanup and disposal.

Disposal of wastes is consistent with all applicable federal, state and local laws and regulations to help ensure the protection of employees, customers and the environment.

All service professional are operating clearly marked Terminix Commercial Service vehicles equipped with secure chemical and equipment areas.

Training to Remain the Best

Ongoing training and professional development are a daily practice of Terminix Commercial. Our service professionals are kept abreast of the latest technical advances and service practices available through the following in-service training programs:

Advanced Study Program for Integrated Regionalized Education (ASPIRE) Commercial Training Program: This 20-day initial training program consists of two basic parts: (1) Field Training and (2) Classroom Workshop. The employee utilizes a Workbook designed to train him/her in the specific job classification and guides them. A Field Mentor works with the employee through the field training portion of training. In conjunction with the Workbook, the employee also receives an ASPIRE Commercial Service Manual which is a reference and training manual detailing the specifics of CORE Training, Principles of Pest Management, Commercial Service Guidelines and Basics of Termite Control. The employee also attends an ASPIRE 4-day training workshop that reinforces and expands on all phases of pest management and all facets of Terminix service offerings. The 16-day field training and 4-day workshop are also complimented with instructional and educational videos to assist in the training.

PACE Training Programs: These consist of written modules which contain learning material, pop quizzes for immediate reinforcement of material, and exercises. These exercises are throughout the training rather than at the conclusion so the attendee can work on the learning at the time it is introduced.

PACE Commercial Customer Service Training for Service Professionals
Designed to address the special needs of our commercial customers, this course covers understanding what commercial customers want; communicating for great customer service; being responsive to customers; and the elements of the Terminix Quality Assurance Program.

PACE Customer Service Training for Office Professionals
Designed specifically for Terminix office staff, the content includes the ideals of customer service, transforming the telephone and the elements of the Terminix Quality Assurance Program.

PACE programs also cover sales training for sales professionals as well.

TERMINIX "Technically Speaking" or "Tech Speak": Written training material with pre-test questions and post-test questions along with specific training materials are issued weekly from our Corporate Technical Department to be used in each branch location's weekly service meeting. Branch locations are required to hold weekly training sessions and forward an attendance sheet to the Region Training and Compliance Manager. The meetings are sometimes held on-site at customer locations for hands-on training.

Regional training meetings are held at different times of the year and incorporate various aspects of pest management strategies, equipment, and techniques.

C.9 Attachment

Terminix Contract Signature page

property or premises, and will not proceed as a class action or private attorney general action. The foregoing prohibition on consolidated, class action and private attorney general arbitrations is an essential and integral part of this arbitration clause and is not severable from the remainder of the clause. The decision of the arbitrator shall be a final and binding resolution of the Claim. This arbitration agreement is made pursuant to a transaction involving interstate commerce and shall be governed by the Federal Arbitration Act, 9 U.S.C. Sections 1-16. Judgment upon the award may be entered in any court having jurisdiction. Neither party shall sue the other party with respect to any matter in dispute between the parties other than for enforcement of this arbitration agreement or of the arbitrator's award. THE PARTIES UNDERSTAND THAT THEY WOULD HAVE HAD A RIGHT OR OPPORTUNITY TO LITIGATE DISPUTES THROUGH A COURT AND TO HAVE A JUDGE OR JURY DECIDE THEIR CASE, BUT THEY CHOOSE TO HAVE ANY DISPUTES DECIDED THROUGH ARBITRATION.

12. SEVERABILITY. If any part of this agreement is held to be invalid or unenforceable for any reason, the remaining terms and conditions of this agreement shall remain in full force and effect.
13. GUARANTEE OF CUSTOMER SATISFACTION. We will answer your call anytime, day or night. We will perform your service or schedule an appointment within 24 hours after receiving your call. We will be on time. We will do the job right the first time, or we will do it over. We will show we care by our professional appearance and manner, and by the products and procedures we use. We will perform all services at your convenience to avoid any interruption to your normal operations.

By signing within thirty (30) days of the date below, Purchaser accepts our offer of Pest Control, Rodent Control, Fly Control and Bird Control on the Terms and Conditions identified herein.

THE TERMINIX INTERNATIONAL COMPANY, L.P.

By: _____

Title: BRANCH MGR

Date: 7/9/12

City of East Palo Alto JOHN DOUGHTY FOR
Jay Farr

By: _____

Title: C.D. Director

Date: 6/12/12

INTEGRATED PEST MANAGEMENT AND SCOPE OF SERVICE

The Integrated Pest Management Solution

At Terminix Commercial, we believe the best way to solve pest problems is to correct the conditions that contribute to them. Following the procedures of the Integrated Pest Management (IPM) program, we focus our approach to treatment on eliminating pests, their harborage areas and their entry points to your facility to provide maximum effectiveness with minimal treatment.

IPM is a low or non-chemical alternative of controlling pests through the cooperative teamwork of your business and Terminix Commercial through improving sanitation awareness, proper building exclusion, and low or non-chemical methods of treatment to eliminate a pest infestation to protect the health and safety of employees and the environment.

Components of the Terminix Commercial IPM program include:

- Inspection of your facility and its exterior surroundings
- Identification of the types of pests present
- Identification and investigation of conditions that contribute to infestations
- Analysis of current pest activity
- Recommendations for limiting and preventing future infestations
- Implementation of mechanical methods for controlling pests
- Application of highly targeted treatments
- Continuous evaluation and fine-tuning of service to meet future needs
- Education of your staff about actions that contribute to pest activity

Non-chemical Pest Control Methods. Terminix uses non-chemical pest control methods where these are feasible and efficacious. These include:

- Sanitation (removing food & water sources)
- Exclusion
- Harborage Removal
- Harborage Denial
- Trapping & Monitoring
- Vacuuming
- Lighting

1. Sanitation: Sanitation involves cleaning up and/or removing potential food and water sources for pests. The fewer food sources that are present, the fewer pests that can survive. Even something as simple as picking up a lemon that has rolled under a table can prevent a significant fruit fly infestation. A regular schedule of cleaning floors, equipment, floor drains, trash receptacles and dumpsters is the best

C.9 Attachment

Terminix QualityProCertificate

QualityPro

The Mark of Excellence in Pest Management

Presenting this certificate of excellence to

TheTerminix International Co Lp

in acknowledgment of your continuing efforts toward professional excellence
in the pest management industry by meeting the QualityPro requirements
and achieving the mark of excellence in pest management.

official signature

QualityPro 2007

QualityPro 2008

QualityPro 2009

C.9 Attachment

Terminix USGBCMembershipCertificiate

U.S. Green Building Council

Terminix International
MEMBER SINCE 2009

THE U.S. GREEN BUILDING COUNCIL IS THE NATION'S FOREMOST COALITION OF LEADERS WORKING TO TRANSFORM THE WAY BUILDINGS AND COMMUNITIES ARE DESIGNED, BUILT AND OPERATED, ENABLING AN ENVIRONMENTALLY AND SOCIALLY RESPONSIBLE, HEALTHY, AND PROSPEROUS ENVIRONMENT THAT IMPROVES THE QUALITY OF LIFE.

Gail Vittori, Chair

S. Richard Fedrizzi, President, CEO and Founding Chairman

U.S. Green Building Council

Terminix International
MEMBER SINCE 2009

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Gail Vittori, Chair

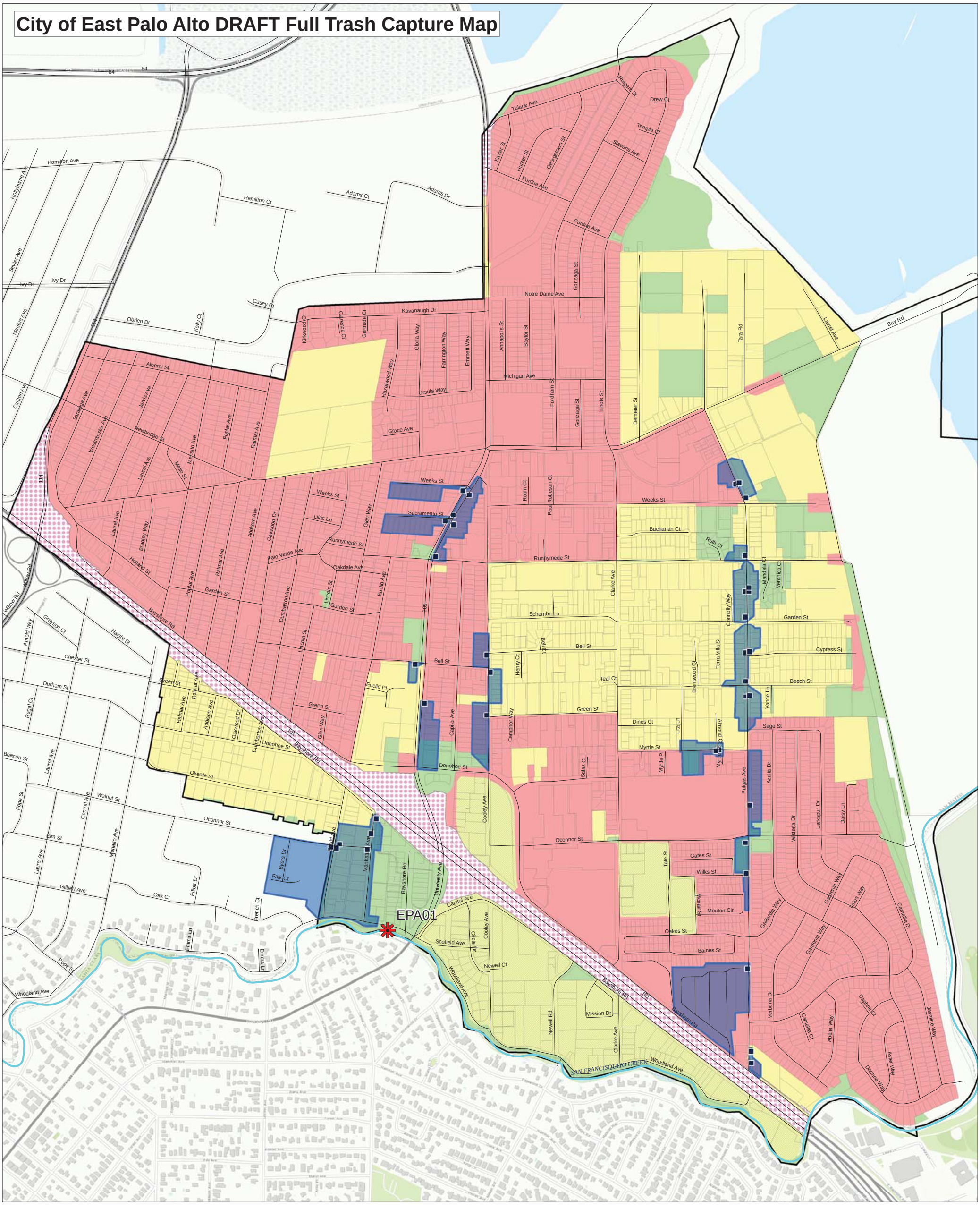
S. Richard Fedrizzi, President, CEO and Founding Chairman

C.10
Attachments

C.10 Attachment

East Palo Alto Full Capture 11 x 17

City of East Palo Alto DRAFT Full Trash Capture Map



Legend

Trash Generation Category

- Low
- Medium
- High
- Very High

- Creek/Shoreline Hotspot
- Full-Capture Location
- Full Trash Capture
- Non-Jurisdictional (Dot color = Generation Category)

- Streets
- Agency Boundary
- Creeks
- Parcel Boundary

N

0 0.1 0.2 0.4 Miles

Data Sources:
Roads: San Mateo County
City Boundaries: San Mateo County
Background: ESRI World Topographic Map

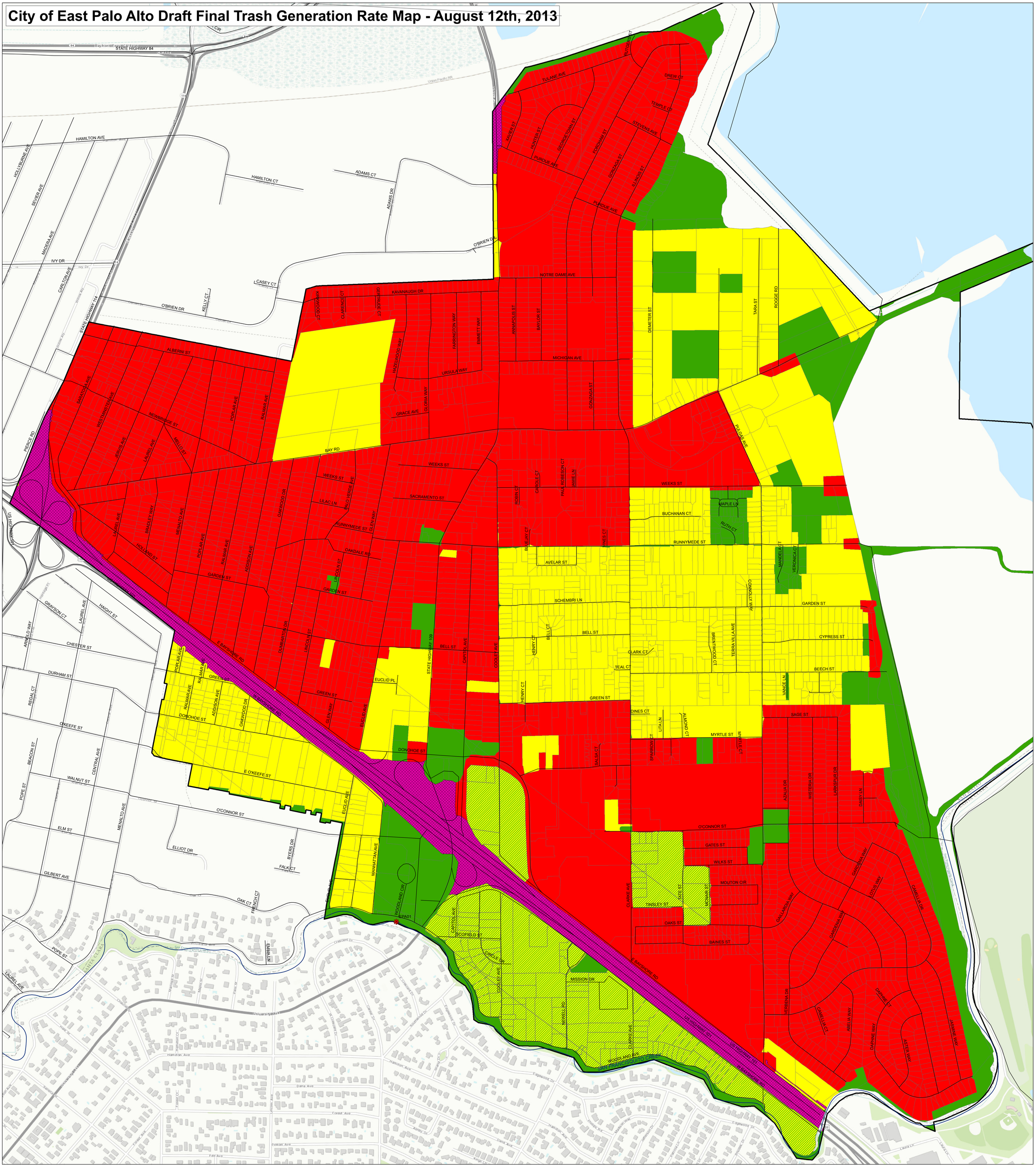
Map Created By:
EOA, Inc.

Date:
September 11th, 2013

C.10 Attachment

East Palo Alto Generation Map v3

City of East Palo Alto Draft Final Trash Generation Rate Map - August 12th, 2013



Legend

Generation Rate (gal/acre/year)

- Low (< 5)
- Low/Medium
- Medium (5 - < 10)
- Medium/High
- High (10 - < 50)
- High/Very High
- Very High (> 50)

- Non-Jurisdictional
- Full Trash Capture
- Trash Hot Spot
- Streets
- Agency Boundary
- Creeks

N

0 0.1 0.2 0.4 Miles

Data Sources:
Streets: San Mateo County
City Boundaries: San Mateo County
Background: ESRI World Topographic Map

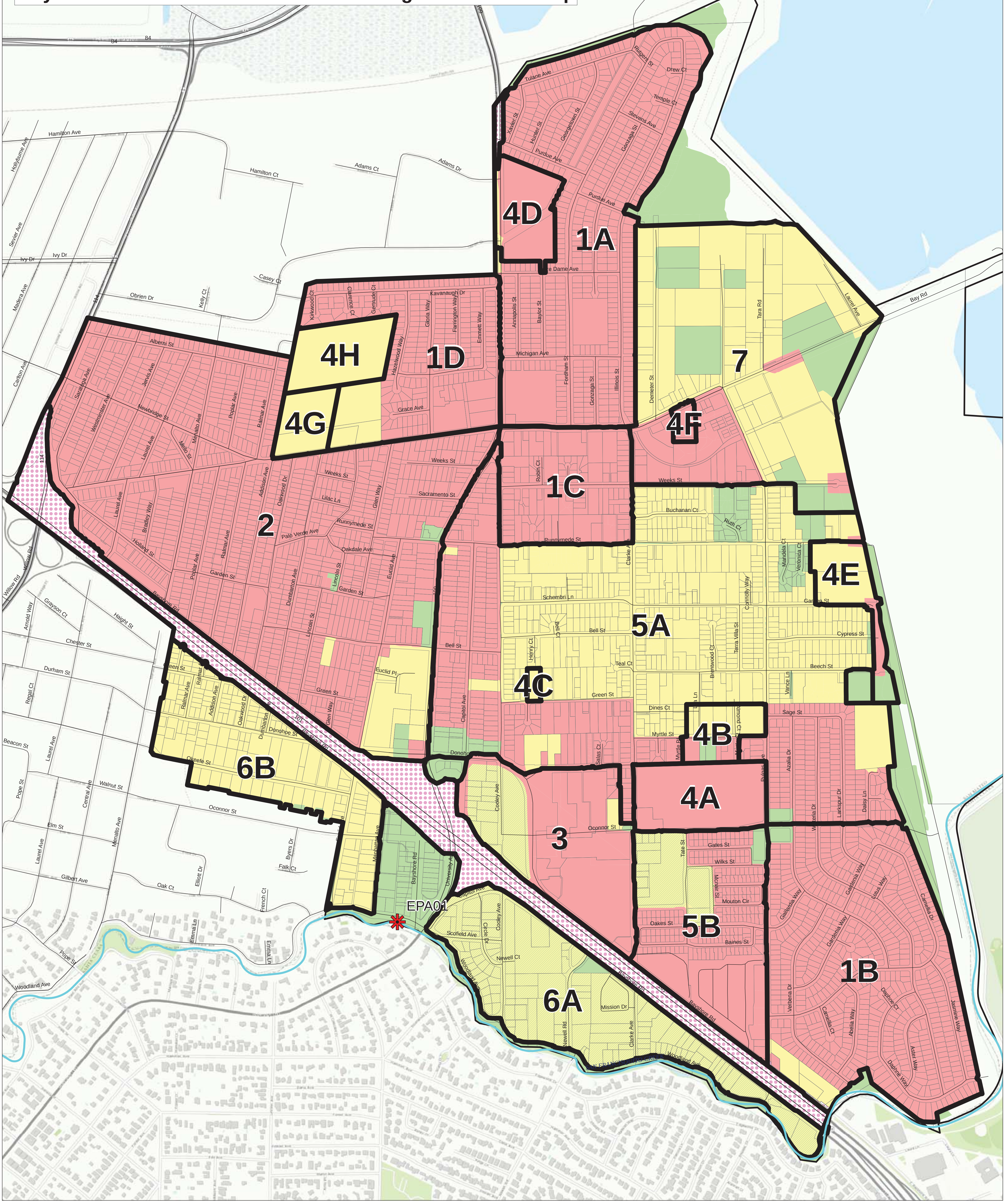
Map Created By:
EOA, Inc.

Date:
August 12th, 2013

C.10 Attachment

East Palo Alto Trash Management Areas 11 x 17

City of East Palo Alto DRAFT Trash Management Areas Map



Legend

Trash Generation Category

- Low
- Low/Medium
- Medium
- Medium/High
- High
- High/Very High
- Very High

Creek/Shoreline Hotspot

Trash Management Area

Non-Jurisdictional (Dot color = Generation Category)

Streets

Agency Boundary

Creeks

Parcel Boundary

N

0 0.1 0.2 0.4 Miles

Data Sources:
Roads: San Mateo County
City Boundaries: San Mateo County
Background: ESRI World Topographic Map

Map Created By:
EOA, Inc.

Date:
September 11th, 2013