



**Municipal Regional Permit  
National Pollution Discharge Elimination System  
City of East Palo Alto  
ANNUAL REPORT 2013-2014**



City of East Palo Alto  
Community and Economic Development Department  
1960 Tate Street  
East Palo Alto, CA 94303

September 15, 2014

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

Subject: City of East Palo Alto  
FY 2013/14 Annual Report

Dear Mr. Wolfe:

This letter and Annual Report with attachments is submitted by the City of East Palo Alto pursuant to Permit Provision C.16.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2009-0074, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of compliance activities conducted during FY 2013/14 and related accomplishments.

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

Very truly yours,

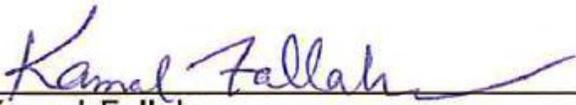
Kamal Fallaha  
Duly Authorized Representative  
City Engineer

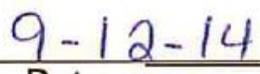
**City of East Palo Alto  
FY 2013/14 ANNUAL REPORT**

**Certification Statement**

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

**Signature of Duly Authorized Representative:**

  
Kamal Fallaha

  
Date

**FY 2013-2014 Annual Report**  
**Permittee Name: City of East Palo Alto**

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Permittee Name: \_\_\_\_\_

Section 1 – Permittee Information

Background Information					
Permittee Name:	City of East Palo Alto				
Population:					
NPDES Permit No.:	CAS612008				
Order Number:	R2-2009-0074R				
Reporting Time Period (month/year):	July 2013 through June 2014				
Name of the Responsible Authority:	Kamal Fallaha	Title:	City Engineer		
Mailing Address:	1960 Tate St				
City:	East Palo Alto	Zip Code:	94303	County:	San Mateo
Telephone Number:	650-853-	Fax Number:			
E-mail Address:	<a href="mailto:kfallaha@cityofepa.org">kfallaha@cityofepa.org</a>				
Name of the Designated Stormwater Management Program Contact (if different from above):	Michelle Daher	Title:	Environmental Programs Management Analyst		
Department:	Community and Economic Development Department				
Mailing Address:	1960 Tate Street				
City:	East Palo Alto	Zip Code:	94303	County:	San Mateo
Telephone Number:	650-853-3197	Fax Number:			
E-mail Address:	<a href="mailto:mdaher@cityofepa.org">mdaher@cityofepa.org</a>				

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

**Program Highlights and Evaluation**

Highlight/summarize activities for reporting year:

Summary:

During FY13/14, the City of East Palo Alto has conducted the following activities per this subsection:

- 1) participation in the SMCWPPP Public Works Municipal Maintenance Subcommittee
- 2) participation in the SMCWPPP Integrated Pest Management workgroup
- 3) Participation in pesticide management training
- 4) Participation in 5-minute BMP trainings staged quarterly
- 5) Participation in annual BMP refresher training
- 6) Refer to the C.2 Municipal Operations section of the SMCWPPP FY 13-14 Annual Report for a description of activities implemented at the countywide and/or regional level.

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

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

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

Comments: **The City has enhanced BMPs for street road and repair and maintenance practices, implementing vacuum practices for wet materials and utilizing dry options, where feasible.**

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

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

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

Comments: **Annual renewal of BASMAA Mobile Surface Cleaner Program BMPs and quarterly 5-minute BMP refreshers for continuous updates.**

**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.

<input checked="" type="checkbox"/>	Control of discharges from bridge and structural maintenance activities directly over water or into storm drains
<input checked="" type="checkbox"/>	Control of discharges from graffiti removal activities
<input checked="" type="checkbox"/>	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
<input checked="" type="checkbox"/>	Implementation of the BASMAA Mobile Surface Cleaner Program BMPs for graffiti removal
<input checked="" type="checkbox"/>	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.
<input checked="" type="checkbox"/>	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities.

Comments: **Bridge maintenance is not applicable, however, structural maintenance activities directly over water or into storm drains is applicable. The City has provided 5-minute BMP refreshers to continue to update processes to ensure that stormdrains are protected while maintenance activities are performed.**

**C.2.d. ► Stormwater Pump Stations**

Does your municipality own stormwater pump stations:  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<sup>1</sup> (add more rows for additional pump stations). If a pump station is exempt from DO monitoring, explain why it is exempt.

Pump Station Name and Location	First inspection Dry Weather DO Data		Second inspection Dry Weather DO Data	
	Date	mg/L	Date	mg/L
O'Connor Pump Station	06/24/2013	7.1/7.3	09/05/2013	8
O'Connor Pump Station	08/22/2013	6.7/8.2	09/05/2013	8
O'Connor Pump Station	09/02/2014	5.6/8.6	09/05/2013	8

Summarize corrective actions as needed for DO monitoring at or below 3 mg/L. Attach inspection records of additional DO monitoring for corrective actions: **Not applicable**

Summary: **DO Tests have not shown to be at or below 3mg/L.**

Attachments: **None; no corrective actions required.**

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

<sup>1</sup> 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.

FY 2013-2014 Annual Report

C.2 – Municipal Operations

Permittee Name: **City of East Palo Alto**

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	September 23, 2013	1.5 cy	No	No	Yes	No
O'Connor Pump Station	November 25, 2013	2.0 cy	No	No	Yes	No
O'Connor Pump Station	February 27, 2014	2.25 cy	No	No	Yes	No
O'Connor Pump Station	February 28, 2014	2.25 cy	No	No	Yes	No
O'Connor Pump Station	March 3, 2014	2.5 cy	No	No	Yes	No
O'Connor Pump Station	March 30, 2014	2.75 cy	No	No	Yes	No
O'Connor Pump Station	April 1, 2014	3.0 cy	No	No	Yes	No
O'Connor Pump Station	April 2, 2014	3.25 cy	No	*YES	Yes	No
				*presence of color was white floatables; color was determined to be a blossom plume from tree blossoms		

C.2.e. ► Rural Public Works Construction and Maintenance					
Does your municipality own/maintain rural <sup>2</sup> roads:		<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
If your answer is <b>No</b> then skip to <b>C.2.f.</b>					
Place a <b>Y</b> in the boxes next to activities where applicable BMPs were implemented. If not applicable, type <b>NA</b> in the box and provide an explanation in the comments section below. Place an <b>N</b> in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.					
<input type="checkbox"/>	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas				
<input type="checkbox"/>	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources				
<input type="checkbox"/>	No impact to creek functions including migratory fish passage during construction of roads and culverts				
<input type="checkbox"/>	Inspection of rural roads for structural integrity and prevention of impact on water quality				
<input type="checkbox"/>	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts and excessive erosion				
<input type="checkbox"/>	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate				
<input type="checkbox"/>	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or design of new culverts or bridge crossings				
Comments including listing increased maintenance in priority areas:					

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

Permittee Name: **City of East Palo Alto**

C.2.f. ► Corporation Yard BMP Implementation			
Place an <b>X</b> in the boxes below that apply to your corporations yard(s):			
<input checked="" type="checkbox"/>	We do not have a corporation yard		
<input type="checkbox"/>	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit		
<input checked="" type="checkbox"/>	We have a <b>Stormwater Pollution Prevention Plan (SWPPP)</b> for the Corporation Yard(s)		
Place an <b>X</b> in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type <b>NA</b> in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:			
<input checked="" type="checkbox"/>	Control of pollutant discharges to storm drains such as wash waters from cleaning vehicles and equipment		
<input checked="" type="checkbox"/>	Routine inspection prior to the rainy seasons of corporation yard(s) to ensure non-stormwater discharges have not entered the storm drain system		
<input checked="" type="checkbox"/>	Containment of all vehicle and equipment wash areas through plumbing to sanitary or another collection method		
<input checked="" type="checkbox"/>	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection of all wash water and disposing of wash water to sanitary or other location where it does not impact surface or groundwater when wet cleanup methods are used		
<input checked="" type="checkbox"/>	Cover and/or berm outdoor storage areas containing waste pollutants		
Comments: <b>Site has ongoing stormwater protection program which includes 5 minute BMP trainings to remind staff of specific incident-driven concerns as concerns arise. These trainings are held roughly quarterly, or as-needed.</b>			
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: <b>Do not leave any cells blank.</b>			
Corporation Yard Name	Inspection Date (1x/year required)	Inspection Findings/Results	Follow-up Actions
150 Tara Road	October 28, 2014	Many minor issues identified and immediately corrected. Oil Water 3-chamber interceptor requires maintenance prior to next rainy season.	Ensure Oil-Water separator is maintained prior to next rain event.

**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 City of East Palo Alto does not have any pilot green street projects during this or previous fiscal years. It is the hope of the City to implement LID on Bay Road Phase II-III during FY 14/15, as a voluntary effort to remove pollutants from stormwater flowing from this area, which is adjacent to Brownsfields/superfund sites. The City applied for unsuccessful grant funding that would support this voluntary effort, but is seeking ways of implementing LID into the project with existing funding.**

**The C.3 New Development and Redevelopment section of the SMCWPPP FY 13-14 Annual Report includes a description of activities conducted at the countywide or regional level.**

**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.

**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	<input checked="" type="checkbox"/>	No
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Comments (optional): **The City of East Palo Alto would consider alternative compliance if such an alternative would treat stormwater from higher-risk areas, such as streets, in lieu of treating lower-risk areas, such as rooftops. Alternative compliance will be considered on an as-needed basis to ensure the highest improvement to stormwater quality for local waterways.**

**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	<input checked="" type="checkbox"/>	No
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2. Has your agency granted final discretionary approval of a project identified as a Special Project in the March 15, 2014 report? If yes, include the project in both the C.3.b.v.(1) Table, and the C.3.e.vi. Table.

	Yes	<input checked="" type="checkbox"/>	No
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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.

<b>C.3.h.iv. ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting</b>																													
<p>(1) Fill in attached table C.3.h.iv.(1) or attach your own table including the same information.                      The City utilizes the <a href="#">SMCWPPP O&amp;M Verification Inspection Checklist</a> when conducting inspections. The following is a link to supporting document:  <a href="#">O&amp;M Verification Inspection Checklist</a></p>																													
<p>(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.</p> <p>Summary:  <b>The City of East Palo Alto inspected several stormwater treatment measures during FY 13/14. Many vegetated systems have been installed during this reporting cycle while there have been few</b></p>																													
<p>(3) On an annual basis, provide a discussion of the effectiveness of the O&amp;M Program and any proposed changes to improve the O&amp;M Program (e.g., changes in prioritization plan or frequency of O&amp;M inspections, other changes to improve effectiveness program).</p> <p>Summary: <b>The O&amp;M Inspection Program is ineffective without ongoing reminders to the property owners/operators—or establishing a fee-based inspection program where property owners/operators are required to pay for repeat inspections. Going forward, the City will consider per-inspection fees for ensuring maintenance of these facilities.</b></p>																													
<p>(4) During the reporting year, did your agency:</p> <table border="1"> <thead> <tr> <th></th> <th>Yes</th> <th>No</th> <th colspan="3"></th> </tr> </thead> <tbody> <tr> <td>• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?</td> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> <td><b>Not applicable. No new facilities were installed.</b></td> </tr> <tr> <td>• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls?<sup>3</sup></td> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> <td><b>Not applicable. No treatment measures</b></td> </tr> <tr> <td>• Inspect at least 20 percent of the total number of installed vault-based systems?</td> <td style="text-align: center;">X</td> <td></td> <td></td> <td></td> <td><b>Not applicable. No vault systems.</b></td> </tr> </tbody> </table> <p>If you answered "No" to any of the questions above, please explain:</p>							Yes	No				• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?	X				<b>Not applicable. No new facilities were installed.</b>	• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls? <sup>3</sup>	X				<b>Not applicable. No treatment measures</b>	• Inspect at least 20 percent of the total number of installed vault-based systems?	X				<b>Not applicable. No vault systems.</b>
	Yes	No																											
• Inspect all newly installed stormwater treatment systems and HM controls within 45 days of installation?	X				<b>Not applicable. No new facilities were installed.</b>																								
• Inspect at least 20 percent of the total number of installed stormwater treatment systems or HM controls? <sup>3</sup>	X				<b>Not applicable. No treatment measures</b>																								
• Inspect at least 20 percent of the total number of installed vault-based systems?	X				<b>Not applicable. No vault systems.</b>																								
<b>C.3.i. ► Required Site Design Measures for Small Projects and Detached Single Family Home Projects</b>																													
<p>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.</p> <p>Summary:  <b>BASMAA prepared standard specifications in four fact sheets regarding the site design measures listed in Provision C.3.i, as a resource for Permittees. We have modified local ordinances/policies/procedures and forms/checklists to require all applicable projects approved after December 1, 2012 to implement at least one of the site design measures listed in Provision C.3.i. Typically, small projects are not permitted to connect downspouts directly to the street and must direct rooftop stormwater flow to vegetation. In addition to this, most applicants are strongly encouraged to switch out driveway entrances to porous asphalt, pervious pavement or some other type of absorptive material to reduce the amount of runoff from the project. As 49% of the City is in the floodzone, staff also recommends applicants plant or retains additional interceptor trees, and add detention trenches to retain additional storm flow on-site, whenever feasible.</b></p>																													

<sup>3</sup> If there is only 1 treatment measure in the jurisdiction, the agency must inspect it every year.

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

Project Name Project No.	Project Location, Street Address	Name of Developer	Project Phase No.	Project Type & Description	Project Watershed	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ff <sup>2</sup> )	Total Replaced Impervious Surface Area (ff <sup>2</sup> )	Total Pre- Project Impervious Surface Area (ff <sup>2</sup> )	Total Post-Project Impervious Surface Area (ff <sup>2</sup> )
<b>Private Projects</b>											
1160 Weeks St 4- Unit Subdivision	1160, 1161, 1162 and 1163 Weeks Street (XPulgas)	NHA Developers	None	4 Unit Residential Subdivision	San Francisquito Creek	0.62 acres	0.62 acres	13,764.73 s.f.	0 s.f.	0 s.f.	13,764.73
First Free Wesleyan Tongan Church	432 Bell St (X Euclid)	First Free Wesleyan Tongan Church	None	Church and Parking Lot	San Francisquito Creek	0.61 acres	0.55 acres	6,050 s.f.	4,000 s.f.	11,300 s.f.	10,050 s.f.
Pitcher Drilling	918 Demeter St (X Bay Road)	Pitcher Drilling	None	Parking Lot for Trucking Yard	San Francisquito Creek	1.2 acres	0.8 acres	15,200 s.f.	12,800 s.f.	12,800 s.f.	28,000 s.f.
SUHSD Myrtle Street School Expansion	980 Myrtle St (X Clarke St)	Sequoia Union High School District	Un-phased, 2 <sup>nd</sup> project on site in past 4 years.	Expanded school campus due to larger than anticipated enrollment.	San Francisquito Creek	1.0 Acres	0.885 Acres	27,398 s.f.	11,326 s.f.	11,326 s.f.	38,724 s.f.
Ravenswood Family Health Center	2519 Pulgas (X Bay Road)	Ravenswood Family Health Center	None	New medical campus on previously developed site	San Francisquito Creek	2.7 acres	2.7 acres	31,910 square feet	85,585 square feet	117,495 square feet	117,495 square feet
<b>Public Projects</b>											
Cooley Landing Phase III	2100 Bay Road (X Pulgas)	City of East Palo Alto	Phase III	Roadway paving, park utility infrastructure, parking paving	San Francisco Bay	10.18 acres	1.6 acres	26,555 s.f.	0 s.f.	26,425 s.f.	52,980 s.f.
MPFPD Fire Station #2, Phase III	2290 University Ave (X Runnymede)	Menlo Park Fire Protection District	Three (3)	Construction of new building and driveway	San Francisquito Creek	0.57 acres	0.57 acres	163 s.f.	21,681 s.f.	21,681 s.f.	21,844 s.f.

Comments:

For the First Free Wesleyan Tongan Church project, the project scope changed after final discretionary approval. The original church project included a gravel parking lot, which was modified with paving. In this instance, the church opted for pervious pavement with a concrete perimeter; the concrete placed the project into "regulated" status, although the site is by and large self-treating and with appropriate credits falls under the threshold for "regulated project" status. The City opted to include this project in the "regulated" projects due to the need to include an O&M Agreement for the stormwater detention system and pervious pavement, along with a section of the stormdrain system which is privately maintained. For this, ongoing inspections will be necessary, and the City will wish to continue to monitor the site for ongoing compliance.

There are several projects not included in the above tables, but bear to mention in this comment section. Due to high staff turnover rates and poor prior recordkeeping/inadequate database, an unknown number of projects have been granted staff-level discretionary approval by former staff persons, in prior years (prior to the FY 2012/13). While many of these previously approved projects have, in fact, an extended tentative parcel map (automatically extended by the State of California), the City may choose to impose updated NPDES LID requirements for these projects. For instance, University Plaza, a project from the Sobrato Organization, was previously approved and includes vault-based treatment for a very large scale project. DKB Homes, a 52-unit subdivision project from the DAL Properties, LLC, was previously approved with vault-based treatment. Both project proponents have requested to be "grandfathered-in" to prior stormwater compliance requirements. The City has requested documentation as to how the project proponent has diligently pursued the project since receiving tentative and/or final parcel map approval, without a six-month gap in attempting to move forward with obtaining a building permit for the project. If the project proponents in these or other previously approved regulated projects provide adequate evidence that they have been diligently pursuing the completion of their projects, the City may request review by the Water Board as to the potential justification for allowing vault-based treatment systems; however, it is the stance of the City to strongly discourage vault-based treatment systems on these projects, with a strong preference for implementing LID, site design enhancements, and source controls to reduce the need for vault-based treatment systems.

Permittee Name: **City of East Palo Alto**

**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	Application Final Approval Date	Source Control Measures	Site Design Measures	Treatment Systems Approved	Type of Operation & Maintenance Responsibility Mechanism	Hydraulic Sizing Criteria	Alternative Compliance Measures	Alternative Certification	HM Controls
<b>Private Projects</b>										
1160 Weeks St 4- Unit Subdivision	10/23/2013	10/24/2013	Disconnected downspouts, properly designed trash storage areas; storm drain stenciling; efficient landscape irrigation systems; drought tolerant vegetation, pervious pavement; trees	Retention of existing trees; with enhanced bioretention and detention of stormwater; O&M Agreement requiring low chemical inputs on vegetation, vector of pervious pavement	Bioretention system; pervious pavement	Record O&M With San Mateo County Records	The volume of annual runoff required to achieve> 80 % capture, based on CASQA, using local rainfall data	None	None	None
First Free Wesleyan Tongan Church	09/05/2012>> Revised 03/25/2014	03/25/2014	Disconnected downspouts, properly designed trash storage areas; storm drain stenciling; efficient landscape irrigation systems; drought tolerant vegetation, pervious pavement	Retention of existing trees; with enhanced bioretention and detention of stormwater; O&M Agreement requiring low chemical inputs on vegetation, vector of pervious pavement	Treatment trench system; pervious pavement	Record O&M With San Mateo County Records	The volume of annual runoff required to achieve> 80 % capture, based on CASQA, using local rainfall data	None	None	None
Pitcher Drilling	10/23/2013	10/24/2013	Ensured all chemicals are properly separated and covered; repair areas separated with oil/sand three-chamber separator	Minimized parking lot size, included existing trees, provided enhanced vegetation.	Bioretention system with underdrain and gravel detention enhancements to retain larger volume of stormwater for flood protection.	O&M Agreement to be recorded at San Mateo County and with City Clerk.	The volume of annual runoff required to achieve> 80 % capture, based on CASQA, using local rainfall data	None	None	None
SUHSD Myrtle Street School Expansion	12/17/2013	01/06/2014	Disconnected downspouts, properly designed trash storage areas; storm drain stenciling; efficient landscape irrigation systems; drought tolerant vegetation	Minimized parking lot size, included existing trees, provided enhanced vegetation	Bioretention system with underdrain; tree wells	O&M Agreement to be recorded at San Mateo County and with City Clerk.	The volume of annual runoff required to achieve> 80 % capture, based on CASQA, using local rainfall data	None	None	None
Ravenswood Family Health Center	07/12/2014	04/17/2014	Disconnected downspouts, properly designed trash storage areas; storm drain stenciling; efficient landscape irrigation systems; drought tolerant vegetation, bike parking	Minimized parking lot size, included existing trees, provided enhanced vegetation, enhanced biotreatment systems	Fully lined bioretention systems with underdrains	O&M Agreement to be recorded at San Mateo County and with City Clerk.	The volume of annual runoff required to achieve> 80 % capture, based on CASQA, using local rainfall data	None	None	None
Comments: The City has tightened up the planning and permitting process to ensure all projects receive comments pertaining to stormwater quality enhancements, including strong recommendations for implementing disconnected downspouts, drought tolerant vegetation, and low-flow irrigation. Further improvements for projects that do not meet the "regulated status" threshold include encouraging applicants to plant interceptor-type trees										

Permittee Name: **City of East Palo Alto**

**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	Date Construction Scheduled to Begin	Source Control Measures	Site Design Measures	Treatment Systems Approved	Operation & Maintenance Responsibility Mechanism	Hydraulic Sizing Criteria	Alternative Compliance Measures	Alternative Certification	HM Controls
<b>Public Projects</b>										
Cooley Landing Phase II	07/11/2013	09/15/2013	Minimize land and ecological disturbances; reduce impervious areas, drain all impervious surfaces to vegetated systems designed to detain stormwater prior to entering the San Francisco Bay; ensure biotreatment for areas not considered self-treating	Curb cuts and flow dissipaters for driveways and parking areas; divert stormwater flow from impervious surfaces to self-treating areas, where possible; bioretention areas where self-treating is not possible	Special resource area! Clapper rails and Salt Marsh Harvest Mouse habitat in near vicinity. Bioretention system with drought tolerant vegetation and low-flow irrigation on driveway between Bay Road and Cooley Landing park; reduce pesticide/ fertilizer/ chemical use to minimize impact on natural habitat.	City Memorandum of Understanding; ensure proper training of maintenance staff responsible for caring and maintaining park.	The volume of annual runoff required to achieve > 80 % capture, based on CASQA, using local rainfall data	None	None	None
Comments: <b>Menlo Park Fire Station #2 Phase III and Ravenswood Family Health Center are still under construction.</b>										

Permittee Name: **City of East Palo Alto**

**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)	Party Responsible Maintenance	Date of Inspection	Type of Inspection	Type of Treatment/HM Control(s) Inspected	Inspection Findings or Results	Enforcement Action Taken	Comments/Follow-up
Pitcher Drilling	218 Demeter	Yes	Terry Shewchuk	1) 03/2014 2) 06/08/2014	1) Installation 2) O&M	Bioretention Areas	1) Installation final; correct with proper vegetation and irrigation 2) Issues with leaking oil from trucks required follow-up	1) None  2) None, proper site maintenance occurred	1) None  2) Due to the heavy and large equipment, this site may require enhanced O&M Discussed with Terry Schewchuk.
First Free Wesleyan Tongan Church	432 Bell St	Yes	First Free Wesleyan Tongan Church	06/23/2014	Installation	Infiltration Trench and Permeable Joint Pavement	Required removal of soil stockpile and appropriate plant spacing along with irrigation plan which has been completed.	None	Ongoing effort for church to appropriately finalize O&M; awaiting final plant specs and irrigation diagrams before finalizing—pastor of church has resigned creating further issues with finalizing O&M. No building permit final until this is completed. Site may lose temporary use permit option if not finalized before October 30 <sup>th</sup> , 2014.
1160 Weeks St Subdivision	1160-63 Weeks St	Yes	NHA Investments, individual homeowners	Multiple; Final inspection September 2, 2014	Installation	Bioretention area; pervious pavement	Final site improvements approved; awaiting O&M Agreement finalization prior to issuing occupancy	None	Ensure O&M Agreement is reviewed by City Attorney office prior to having recorded with County.
YMCA	550 Bell St	NO	YMCA	06/04/2014	O&M Verification	Reminder sent regarding 2014/15 O&M Verification requirements for stormwater treatment vault.	Visual inspection; reminder sent out regarding requirements of sending O&M Verification to City annually.	None	Ensure City receives O&M Certification of vault cleanout, annually. FY14/15 Inspection
Cummings Park	1765 E. Bayshore Rd	NO	Cummings Park BOA and HOA	12/09/2013	O&M Verification	Inspection of site required immediate cleanout of underground vault; verification provided.	Visual inspection of overflowing trash containers required immediate certification of vault maintenance. Certification provided.	None	Ongoing annual requirements of SWTM O&M required. BMPs improving but still requires annual review. FY 14/15 Inspection
La Estrellita Market	2387 University Ave	NO	Hector Cornelio	06/04/2014	O&M Verification	Reminder sent to owner that inspection of site SWTMs will be required for FY14/15.	Visual inspection of swale in undocumented inspection indicates no urgent issues; reminder provided to owner/operator that FY 14/15 will require inspection.	None	FY 14/15 Inspection
SUHSD Myrtle Street School	980 Myrtle St	NO	Sequoia Union High School District	06/04/2014	O&M Verification	Visual inspection of Myrtle St School indicates biotreatment in good shape;	Newly developed/expanded campus will require installation inspections; as needed	None	Installation Inspection for updated campus required as-needed.
MPPFD Fire Station #2	2290 University Ave	NO	Menlo Park Fire Protection District	06/04/2014	O&M Verification	Inspection of Phase I installation requires updated certification of maintenance of vault and oil/sand separator. Additional	Site manager to provide certification of Vault and oil/water separator prior to October 15 <sup>th</sup> 2014	None	Certification of vault and oil/water separator required prior to October 15, 2014; further inspections as-needed for new/redevelopment of site Phase

Permittee Name: **City of East Palo Alto**

**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)	Party Responsible Maintenance	Date of Inspection	Type of Inspection	Type of Treatment/HM Control(s) Inspected	Inspection Findings or Results	Enforcement Action Taken	Comments/Follow-up
						inspections shall be conducted for new/redeveloped area of Fire Station #2 as needed,			

C.3.e.vi.Special Projects Reporting Table													
Reporting Period – January 1 – June 30, 2013													
Project Name & No.	Permittee	Address	Application Submittal Date	Status	Description	Site Total Acreage	Density DU/Acre	Density FAR	Special Project Category	LID Treatment Reduction Credit Available	List of LID Stormwater Treatment Systems	List of Non-LID Stormwater Treatment Systems	
No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	No Special Projects were approved between December 2011 and June 30, 2014	Category A: Category B: Category C: Location: Density: Parking:  No Special Projects were approved between December 2011 and June 30, 2014	Category A: Category B: Category C: Location: Density: Parking:  No Special Projects were approved between December 2011 and June 30, 2014	Indicate each type of LID treatment system and the percentage of total runoff treated  No Special Projects were approved between December 2011 and June 30, 2014	Indicate each type of non-LID treatment system and the percentage of total runoff treated. Indicate whether minimum design criteria met or certification received  No Special Projects were approved between December 2011 and June 30, 2014

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

<b>Program Highlights</b>
Provide background information, highlights, trends, etc.
In accordance with this provision, the City of East Palo Alto actively participated in these efforts: 1) conducted inspections; 2) conducted training; 3) participated in the Commercial, Industrial and Illicit Discharge (CI) Subcommittee; 4) follow-up on escalated enforcement for occurrences requiring escalation. Refer to the C.4. Industrial and Commercial Site Controls section of the SMCWPPP FY 13-14 Annual Report for a description of activities of SMCWPPP and/or the BASMAA Municipal Operations Committee.

<b>C.4.b.i. ► Business Inspection Plan</b>		
Do you have a Business Inspection Plan?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If No, explain:		

**C.4.b.iii.(1) ► Potential Facilities List—San Mateo County Environmental Health**

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.

**C.4.b.iii.(1)  
 Potential Facilities List  
 Facilities Inspected by San Mateo County**

FACILITY NAME		STREET NAME	CITY
EASTSIDE MARKET	2368	CLARKE	EAST PALO ALTO
COOLEY AVENUE MARKET	2235	COOLEY	EAST PALO ALTO
SEVEN ELEVEN FOOD STORE #14336 E	77	NEWELL	EAST PALO ALTO
OAKWOOD MARKET INC	2106	OAKWOOD	EAST PALO ALTO
GARDEN SUPERMARKET	1933	PULGAS	EAST PALO ALTO
LAS ADELITAS RESTAURANT & MEAT MKT	2373	UNIVERSITY	EAST PALO ALTO
ONE STOP MARKET	1493	BAYSHORE	EAST PALO ALTO
PAL MARKET	2398	UNIVERSITY	EAST PALO ALTO
EL SABOR MICHOCANO	2398	UNIVERSITY	EAST PALO ALTO
MCDONALDS RESTAURANT	2401	UNIVERSITY	EAST PALO ALTO
HEW DRILLING	1045	WEEKS	EAST PALO ALTO
EAST PALO ALTO SENIOR CENTER	560	BELL	EAST PALO ALTO
CARNICERIA RODRIQUEZ	2398	UNIVERSITY	EAST PALO ALTO
RAVENSWOOD CITY SCHOOL DIST	2160	EUCLID	EAST PALO ALTO
CAVALLINO COLLISION CENTER	1880	Bayshore	EAST PALO ALTO
J'S PRODUCT PAINTING CO INC	75	DEMETER	EAST PALO ALTO
INFINITY SALVAGE	2091	BAY	EAST PALO ALTO
GLOBAL STEEL FABRICATION, INC	255	DEMETER	EAST PALO ALTO
OUR COMMON GROUND	2560	PULGAS	EAST PALO ALTO
CESAR CHAVEZ ACADEMY	2350	RALMAR	EAST PALO ALTO
RONALD MCNAIR SCHOOL	2033	PULGAS	EAST PALO ALTO
COSTANO ELEMENTARY SCHOOL	2695	FORDHAM	EAST PALO ALTO
BRENTWOOD SCHOOL	2086	CLARKE	EAST PALO ALTO
TOUCHATT TRUCKING	2535	PULGAS	EAST PALO ALTO
CHEVRON SERVICE STATION #1081	2101	University	EAST PALO ALTO
CAL SPRAY INC	1905	BAY	EAST PALO ALTO
PG&E: COOLEY LANDING SUBSTATION	2000	Bay	EAST PALO ALTO
WBSD ILLINOIS PURDUE PUMP STA	335	DEMETER	EAST PALO ALTO
CASE FURNITURE STRIPPING	2532	PULGAS	EAST PALO ALTO
LA ESTRELLITA	2387	UNIVERSITY	EAST PALO ALTO
TORRES PRINTEX	1175	WEEKS	EAST PALO ALTO
OFFICE DEPOT #978	1761	BAYSHORE	EAST PALO ALTO
MCDONALDS RESTAURANT	1721	BAYSHORE	EAST PALO ALTO
The Home Depot Store #6603	1781	Bayshore	EAST PALO ALTO
LOS ROBLES MAGNET ACADEMY	2450	RALMAR	EAST PALO ALTO
THREE BROTHERS TACOS	2220	UNIVERSITY	EAST PALO ALTO
RAVENSWOOD CHILD DEVELOPMENT CT	951	OCONNOR	EAST PALO ALTO
ASPIRE EAST PALO ALTO CHARTER SCHOOL	1286	RUNNYMEDE	EAST PALO ALTO
STARBUCKS COFFEE CO 5977	1745	BAYSHORE	EAST PALO ALTO
TOGOS/BASKIN ROBBINS	1741	BAYSHORE	EAST PALO ALTO
WELLS REIT II-UNIVERSITY CIRCLE	1900	UNIVERSITY	EAST PALO ALTO
THREE BROTHERS TACOS	1760	BAYSHORE	EAST PALO ALTO
PITCHER DRILLING CO	218	DEMETER	EAST PALO ALTO
FOUR SEASONS HOTEL	2050	UNIVERSITY	EAST PALO ALTO
IKEA EAST PALO ALTO	1700	BAYSHORE	EAST PALO ALTO
EPA CORP YARD	150	TARA	EAST PALO ALTO
NEW BRIDGE MARKET	922	NEW BRIDGE	EAST PALO ALTO
JUST LUNCH	1950	UNIVERSITY	EAST PALO ALTO
SF SOUP CO	1950	UNIVERSITY	EAST PALO ALTO
OCEANNA CAFE	1781	BAYSHORE	EAST PALO ALTO
EASTSIDE COLLEGE CAFETERIA	1043	MYRTLE	EAST PALO ALTO
PARKING CO OF AMERICA	160	DEMETER	EAST PALO ALTO

C.4.b.iii(1)  
 Potential Facilities List  
 Facilities Inspected by San Mateo County

FACILITY NAME		STREET NAME	CITY
FOUR SEASONS HOTEL	2050	UNIVERSITY	EAST PALO ALTO
AUTOZONE #3302	2160	University	EAST PALO ALTO
OCONNOR PUMP STATION	1180	OCONNOR	EAST PALO ALTO
CEO STEEL FABRICATION INC	2530	PULGAS	EAST PALO ALTO
LLANOS AUTO REPAIR	1849	BAY	EAST PALO ALTO
A 1 AUTO SERVICE & TOWING	2526	PULGAS	EAST PALO ALTO
E PALO ALTO SHELL	2194	UNIVERSITY	EAST PALO ALTO
EMMANUEL PIZZA & BAKERY INC	1489	BAYSHORE	EAST PALO ALTO
TAQUERIA LOS TEMOS	1491	BAYSHORE	EAST PALO ALTO
ACE FIRE EQUIPMENT & SVC CO INC	1870	BAYSHORE	EAST PALO ALTO
CARLOS AUTO REPAIR	350	DEMETER	EAST PALO ALTO

Permittee Name: **City of East Palo Alto**

**C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto**

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.

<u>Priority Level</u>	<u>Facility Name</u>	<u>Facility address</u>	<u>Type of Business</u>	<u>Year of Inspection</u>	<u>Last Inspection</u>
High	Higuerra's Hauling	2519 Pulgas Ave (confirm)	Hauling	2014/2015	None
High	A'S TOWING	TBD	automotive	2014/2015	2013/2014
High	Alfredo's carpet cleaners	831 Weeks st	Painting/Carpeting Mobile Business	2014/2015	2013/2014
High	Light Tree Apartments	1805 E. Bayshore Rd	apartments	2014/2015	2013/2014
High	Mikes Trucking	2527 Hazelwood Wy	automotive	2014/2015	2013/2014
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2014/2015	2013/2014
High	SPECIALTY TOWING AND RECOVERY INC	2666 MIDDLEFIELD RD #B	towing	2014/2015	2013/2014
HIGH	SUNRISE ENTERPRISE 87, INC	264 TARA ST	towing	2014/2015	2013/2014
HIGH	Toubar Equipment, CS Trucking, JDP recycling, Touchatt Trucking	2535 Pulgas Ave	automotive	2014/2015	2013/2014
HIGH	Winston Taylor Concrete	1195 Garden	construction	2014/2015	2013/2014
High	Oasis Painting	2374 Palo Verde Ave	HOME BASED BUSINESS	2014/2015	2013/2014
High	Mitchell's Carpet Cleaning	252 Azalea	Home Based Business	2014/2015	2013/2014
High	Mongird Construction; Marek Kozlowski Construction; Velasquez Construction; HZ Construction, HZ Engineering, and HZ Insulation Construction	2509 Pulgas (may move prior to inspection)	Multiple Businesses	2014/2015	2013/2014

Permittee Name: **City of East Palo Alto**

C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto					
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.					
Medium	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive	2014/2015	2013/2014
Medium	ARTEAGA AUTO CLEANING AND DETALLING	867 Weeks St	mobile auto	2014/2015	2013/2014
Medium	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2014/2015	2013/2014
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	2014/2015	2013/2014
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2014/2015	2013/2014
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2014/2015	2013/2014
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2014/2015	2013/2014
Low	SPORT AUTHORITY	1775 EAST BAYSHORE RD	retail	2015/2016	2013/2014
Medium	LA FAMILIA DISCOUNT	1803 BAY ROAD	retail	2015/2016	2013/2014
Medium	Ana's Party Store	910 Newbridge St	retail	2015/2016	2013/2014
Low	WOODLAND ARMS APARTMENTS EQR	466 O'Keefe mike Riley 566-2013	residential high density apartments	2015/2016	2013/2014
Medium	Rainer's Service Station	1905 East Bayshore Road	tires	2015/2016	2013/2014
Medium	PUBLIC STORAGE INC.	1961 E. BAYSHORE RD	storage	2015/2016	2013/2014
Low	Bridge Property Management	1969 Tate Street	residential high density apartments	2015/2016	2013/2014

Permittee Name: **City of East Palo Alto**

C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto (cont'd 2)						
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.						
Low	MONTEREY APARTMENTS	1838 W. BAYSHORE STREET	apartments	2015/2016	2013/2014	
Low	COLONIAL APARTMENTS	1483 VIA CONTENTA CT.	apartments	2015/2016	2013/2014	
Low	EUCLID AVENUE APARTMENTS	1910-1950 EUCLID AVE	apartments	2015/2016	2013/2014	
Low	LEITRIM HOUSE APARTMENTS	275 EAST O'KEEFE STREET	apartments	2015/2016	2013/2014	
Low	WOODLAND ARMS APARTMENTS	1717 WOODLAND AVE	apartments	2015/2016	2013/2014	
Low	PARK APARTMENTS	280 EAST O'KEEFE STREET #D	apartments	2015/2016	2013/2014	
Low	RUNNYMEDE GARDENS	2301 COOLEY AVENUE	apartments	2015/2016	2013/2014	
Low	TRADEWINDS APARTMENTS	C/O BRUCE SWENSON	apartments	2015/2016	2013/2014	
High	CS Trucking	2535 Pulgas Ave	trucking	Referred to SMCEH	2013/2014	
HIGH	Firehouse Grill	1765 E. Bayshore Rd	food (stormwater issues)	Referred to SMCEH	2013/2014	
High	Menlo Food Corp	175 Demeter	Referred CEH	Referred to SMCEH	2013/2014	
High	Starbucks	1745 E Bayshore	food (stormwater issues)	Referred to SMCEH	5/16/2013	
Medium	Carlos Auto	350 Demeter	automotive	Referred to SMCEH	2013/2014	
Medium	RE Bormann's Steel C	2450 Pulgas Ave	Industrial	Referred to SMCEH	2013/2014	
Medium	Las Aldelitas	2373 university Ave	food/stormwater	Referred to SMCEH	2013/2014	
Medium	La Estrellita	2387 University Ave	food/stormwater	Referred to SMCEH	2013/2014	
Medium	Global Steel	255 Demeter	Industrial	Referred to SMCEH	2013/2014	

Permittee Name: **City of East Palo Alto**

C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto Cont'd (3)						
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.						
Medium	Mi Pueblo	1731 E. Bayshore	food/stormwater	Referred to SMCEH	2013/2014	
High	Palo Alto Concrete	1923 Pulgas	construction	CLOSED	2013/2014	
Medium	JAT TRUCK #1	1244 LAUREL AVENUE	mobile auto	CLOSED	2013/2014	
High	1172 Beech St Recycling	1172 Beech St	Home Based Recycling	CLOSED	2013/2014	
Medium	JBR Taxi Cab	1885 East Bayshore Road #99	automotive	CLOSED	2013/2014	

**C.4.b.iii.(2) ► Facilities Scheduled for Inspection—San Mateo County Environmental Health**

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

**C.4.b.iii.(2)  
 Facilities Scheduled for Inspection in FY14-15**

FACILITY NAME	SITE ADDRESS	Inspection Due Date	Inspection Frequency
EMMANUEL PIZZA & BAKERY INC	1489 E BAYSHORE RD		3090
THREE BROTHERS TACOS	1760 W BAYSHORE RD		3090
JUST LUNCH	1950 UNIVERSITY AVE		3090
EL SABOR MICHOCANO	2398 UNIVERSITY AVE D		3090
PAL MARKET	2398 UNIVERSITY STE A		3090
BELL ST PARK SWIMMING POOL	550 BELL ST		3090
NEW BRIDGE MARKET	922 NEW BRIDGE ST		3090
HEW DRILLING	1045 WEEKS	7/7/2013	3090
SEVEN ELEVEN FOOD STORE #14336 E	77 NEWELL RD	4/3/2014	3090
SF SOUP CO	1950 UNIVERSITY AVE	4/19/2014	3090
FOUR SEASONS HOTEL	2050 UNIVERSITY AVE	4/19/2014	3090
CARNICERIA RODRIQUEZ	2398 UNIVERSITY STE A	4/19/2014	3090
CESAR CHAVEZ ACADEMY	2350 RALMAR AVE	5/15/2014	3090
LOS ROBLES MAGNET ACADEMY	2450 RALMAR ST	5/15/2014	3090
COSTANO ELEMENTARY SCHOOL	2695 FORDHAM ST	5/15/2014	3090
PARKING CO OF AMERICA	160 DEMETER ST	8/30/2014	3090
WBSD ILLINOIS PURDUE PUMP STA	335 DEMETER ST	9/13/2014	3090
CAL SPRAY INC	1905 BAY RD	10/4/2014	3090
RAVENSWOOD CITY SCHOOL DIST	2160 EUCLID AVE	11/8/2014	3090
CHEVRON SERVICE STATION #1081	2101 UNIVERSITY AVE	1/9/2015	3090
WELLS REIT II-UNIVERSITY CIRCLE	1900 UNIVERSITY AVE	2/12/2015	3090
MCDONALDS RESTAURANT	1721 E BAYSHORE	3/16/2015	3090
TOGOS/BASKIN ROBBINS	1741 E BAYSHORE RD	3/16/2015	3090
OFFICE DEPOT #978	1761 E BAYSHORE RD	3/16/2015	3090
HEW DRILLING	1045 WEEKS	3/28/2015	3090
GLOBAL STEEL FABRICATION, INC	255 DEMETER ST	3/28/2015	3090
COOLEY AVENUE MARKET	2235 COOLEY AVE	4/9/2015	3090
EASTSIDE MARKET	2368 CLARKE AVE	4/9/2015	3090
MCDONALDS RESTAURANT	2401 UNIVERSITY AVE	5/6/2015	3090
OCONNOR PUMP STATION	1180 OCONNOR ST	5/17/2015	3090

**C.4.b.iii.(2) ► Facilities Scheduled for Inspection—City of East Palo Alto**

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

<u>Priority Level</u>	<u>Facility Name</u>	<u>Facility address</u>	<u>Type of Business</u>	<u>Year of Inspection</u>	<u>Last Inspection</u>
High	Higuerra's Hauling	2519 Pulgas Ave (confirm)	Hauling	2014/2015	None
High	A'S TOWING	TBD	automotive	2014/2015	2013/2014
High	Alfredo's carpet cleaners	831 Weeks st	Painting/Carpeting Mobile Business	2014/2015	2013/2014
High	Light Tree Apartments	1805 E. Bayshore Rd	apartments	2014/2015	2013/2014
High	Mikes Trucking	2527 Hazelwood Wy	automotive	2014/2015	2013/2014
High	Ravenswood Ranch	1103 Weeks St	ranch/farm	2014/2015	2013/2014
High	SPECIALTY TOWING AND RECOVERY INC	2666 MIDDLEFIELD RD #B	towing	2014/2015	2013/2014
HIGH	SUNRISE ENTERPRISE 87, INC	264 TARA ST	towing	2014/2015	2013/2014
HIGH	Toubar Equipment, CS Trucking, JDP recycling, Touchatt Trucking	2535 Pulgas Ave	automotive	2014/2015	2013/2014
HIGH	Winston Taylor Concrete	1195 Garden	construction	2014/2015	2013/2014
High	Oasis Painting	2374 Palo Verde Ave	HOME BASED BUSINESS	2014/2015	2013/2014
High	Mitchell's Carpet Cleaning	252 Azalea	Home Based Business	2014/2015	2013/2014
High	Mongird Construction; Marek Kozlowski Construction; Velasquez Construction; HZ Construction, HZ Engineering, and HZ Insulation Construction	2509 Pulgas (may move prior to inspection)	Multiple Businesses	2014/2015	2013/2014

Permittee Name: **City of East Palo Alto**

<b>C.4.b.iii.(1) ► Potential Facilities List—City of East Palo Alto</b>					
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.					
Medium	A 1 AUTO SERVICE & TOWING	2526 PULGAS	automotive	2014/2015	2013/2014
Medium	ARTEAGA AUTO CLEANING AND DETALLING	867 Weeks St	mobile auto	2014/2015	2013/2014
Medium	City of East Palo Alto Corp Yard	150 Tara Rd	Corp Yard Annual Inspection	2014/2015	2013/2014
Medium	Gonzalez Tires	2470A Pulgas Ave	tires	2014/2015	2013/2014
Medium	LOZANO'S AUTO REPAIR	1802 BAY ROAD	automotive	2014/2015	2013/2014
Medium	PALO ALTO PARK MUTUAL WATER CO	2190 ADDISON AVENUE	water purveyor	2014/2015	2013/2014
Medium	Sam's Pressure Washing	2305 Clarke Ave	mobile pressure washing	2014/2015	2013/2014

<b>C.4.c.iii.(1) ► Facility Inspections</b>		
Fill out the following table or attach a summary of the following information. Indicate your violation reporting methodology below.		
<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.	
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.	
	<b>Number</b>	<b>Percent</b>
<b>Number of businesses inspected</b>	<b>35</b>	
<b>Total number of inspections conducted</b>	<b>36</b>	
<b>Number of violations (excluding verbal warnings)</b>	<b>0</b>	
<b>Sites inspected in violation</b>	<b>0</b>	<b>0</b>
<b>Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner</b>		<b>0</b>
<b>Comments:</b>		
CEH haz mat and food inspectors (Inspectors) conducted routine stormwater inspections at inventoried sites based on High, Medium, and Low priorities. If a violation or discharge was observed, a description of the violation was noted on the Inspection Report form. If the violation was not corrected at the time of the original inspection, a copy of the Inspection Report form was given to an Inspector or a Stormwater Technician for		

Permittee Name: **City of East Palo Alto**

follow up. Follow up inspections were routinely conducted within 10 days or otherwise deemed resolved in a longer, but still timely manner, based on available resources.

**C.4.c.iii.(2) ▶ Frequency and Types/Categories of Violations Observed—San Mateo County Environmental Health**

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)	0
Potential discharge and other	0
Comments: No Violations were observed by the San Mateo County Environmental Health Inspectors	

**C.4.c.iii.(2) ▶ Frequency and Type of Enforcement Conducted—County of San Mateo Environmental Health**

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

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

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

	Enforcement Action (as listed in ERP) <sup>4</sup>	Number of Enforcement Actions Taken	% of Enforcement Actions Taken <sup>5</sup>
Level 1	Verbal Warning / Written Notice	0	0
Level 2	Warning Notice or Administrative Action	0	0
Level 3	Administrative Action with Penalty and/or Cost Recovery	0	0
Level 4	Legal Action	0	0
Total		0	0

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

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

Business Category <sup>6</sup>	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Haz Mat (including industrial facilities per 40 CFR; vehicle salvage yards; metal and other recycled materials collection facilities; waste transfer facilities; vehicle mechanical repair, maintenance, fueling, or cleaning facilities; building trades central facilities or yards and corporation yards; nurseries and greenhouses; building material retailers and storage; and plastic manufacturers)	0	0
Food (facilities designated by the Permittee to have a reasonable potential to contribute to pollution of stormwater runoff)	0	0

**C.4.c.iii.(4) ▶ Non-Fileers**

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

**C.4.c.iii.(1) ▶ Facility Inspections—City of East Palo Alto & Palo Alto Regional Water Quality Control Board**

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

<input checked="" type="checkbox"/>	Permittee reports multiple discrete violations on a site as one violation.		
<input type="checkbox"/>	Permittee reports the total number of discrete violations on each site.		
		<b>Number</b>	<b>Percent</b>
Number of businesses inspected		<b>43</b>	
Total number of inspections conducted		<b>55</b>	
Number of violations (excluding verbal warnings)		<b>8</b>	
Sites inspected in violation		<b>8</b>	<b>18.6%</b>

<sup>4</sup> Agencies to list specific enforcement actions as defined in their ERPs.

<sup>5</sup> Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

<sup>6</sup> List your Program's standard business categories.

Permittee Name: **City of East Palo Alto**

Violations resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner		
Comments: 1) Sites inspected in violation are sites which are directly discharging pollutants or may result in a serious potential to enter the stormdrain system, requiring immediate remedy. 2) In all cases, the significant threat to water quality is abated within ten business days and prior to the next storm event; if the owner does not appear to be cooperative or fails to act in accordance with water quality objectives, the City will step in to remedy the violation at the owner's expense. If a violation is ongoing, these issues are typically incidental to the major threat to water quality and simply require full follow-up of all BMPs and site housekeeping prior to releasing the responsible party from ongoing enforcement issues. 3) The City was proactive and consistent with several sites that have a history of non-compliance. The results of these inspections was that several businesses closed down or relocated, while others have significantly improved business practices and are partnering with the City to improve conditions in their surrounding area.		

**C.4.c.iii.(2) ▶ Frequency and Types/Categories of Violations Observed—City of East Palo Alto & Palo Alto Regional Water Quality Control Board**

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

Type/Category of Violations Observed	Number of Violations
Actual discharge (e.g. active non-stormwater discharge or clear evidence of a recent discharge)	2
Potential discharge and other	10
Comments: Discharge streams are counted as one discharge per inspection per site.	12

**C.4.c.iii.(2) ▶ Frequency and Type of Enforcement Conducted—City of East Palo Alto & Palo Alto Regional Water Quality Control Board**

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

	Enforcement Action (as listed in ERP) <sup>7</sup>	Number of Enforcement Actions Taken	% of Enforcement Actions Taken <sup>8</sup>
Level 1	Verbal Warning / Written Notice/Return to Compliance	4	33%
Level 2	Warning Notice or Administrative Action	4	33%
Level 3	Notice to Comply, Compliance Meeting, or Stop Work Orders Administrative Action with Penalty and/or Cost Recovery	4	33%
Level 4	Legal Action	0	0%
<b>Total</b>		<b>12</b>	<b>100%</b>

**C.4.c.iii.(3) ▶ Types of Violations Noted by Business Category—City of East Palo Alto**

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

Business Category <sup>9</sup>	Number of Actual Discharge Violations	Number of Potential/Other Discharge Violations
Automotive (may be home based)	0	4

<sup>7</sup> Agencies to list specific enforcement actions as defined in their ERPs.

<sup>8</sup> Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

<sup>9</sup> List your Program's standard business categories.

Permittee Name: **City of East Palo Alto**

Mobile Business/Home Based (not automotive)	1	2
Light Industrial	0	2
Food, Health, Restaurant or Market	0	1
Apartment Complex or subcontractor thereof	1	1
Nursery	0	0
Ranch	0	0

**C.4.c.iii.(4) ▶ Non-Filers—City of East Palo Alto**

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

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

**C.4.d.iii ▶ Staff Training Summary**

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Ongoing Stormwater Training	Various	On-site Stormwater Compliance and Code Enforcement training as indicated through collaborative inspections	2	100%

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

Program Highlights
Provide background information, highlights, trends, etc.
<p>During this fiscal year, the City of East Palo Alto has completed a Stormdrain Maintenance Master Plan which prioritizes the screening and maintenance of stormdrains in the City with the priority being to eliminate major blockages, keep full trash capture devices properly maintained and functioning according to manufacturer design, and reducing the incidence of flooding, while working to eliminate illegal dumping into the stormdrain system. The City has also participated in the Commercial, Industrial and Illicit Discharge (CII) Subcommittee. Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 13-14 Annual Report for description of activities at the countywide or regional level.</p>

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
Jerome Calubiquib	Code Enforcement for illegal dumping complaints	650-853-5942
Michelle Daher	Stormwater Compliance including initial assessment and follow-up for compliance	650-853-3197
Jay Farr	Maintenance Staff for spill containment and stormdrain protection	650-853-3105

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.
<p>Description:</p> <p>The City of East Palo Alto has a large number of mobile businesses, many of which have not obtained City business licenses and thereby have not been educated on stormwater compliance requirements. To address potential for pollution, the City responds to complaints immediately, staff is trained to observe areas throughout the City for illicit discharges and responds immediately to educate business operators on appropriate BMPs recommended by the BASMAA Mobile Surface Cleaners Program. Inspected mobile businesses found to be lacking in BMPs are required to immediately remedy the improper methods and provided with hardcopies of the SMCWPPP mobile business BMP brochure at <a href="http://www.flowstobay.org/files/mobilecleaners/2012-10mobilecleanertrifold.pdf">http://www.flowstobay.org/files/mobilecleaners/2012-10mobilecleanertrifold.pdf</a>. In cases of direct discharges, escalated enforcement is likely to trigger a fee or penalty to accommodate required cleanup efforts.</p> <p>Mobile businesses are further required to obtain a City business license wherein they are included in the business inspection program and educated as to how to ensure stormwater compliance. Serious offenders are included in the information table shared by countywide members of the SMCWPPP. The City does not typically hire any Mobile Surface Cleaners. Refer to the C.5 Illicit Discharge Detection and Elimination section of the SMCWPPP FY 13-14 Annual Report for a description of efforts by the Commercial, Industrial and Illicit Discharge (CII) Subcommittee and the BASMAA Municipal Operations Committee to address mobile businesses.</p>

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.
<p>Description: The City has screened the collection system and found significant debris throughout the stormwater conveyance system and outfalls. In many areas of the City, stormdrains are mosquito abatement vectors due to standing water, as water is logged due to outfalls that lack appropriate hydraulics to appropriately dispel the water from the pipes. The collection system is over burdened with debris from maintenance deferrals which have been addressed in the City's recently completed Stormdrain Master Plan.</p> <p>Findings at some drainage inlets indicates likelihood of trash being directly discarded into stormdrain inlets and set on fire—likely to reduce the cost burden to residents who have higher solid waste rates. These egregious acts of illegal dumping are of serious concern to the City and requires a greatly enhanced network of community policing. The City's Partnership in Pride campaign is a community-based approach at educating residents to self-police and inform their neighbors about the need to take better care of the city's stormdrain system and local environment. With the Partnership in Pride Campaign, the City is working with residents to develop a more robust illegal dumping partnership with the community, along with seeking additional enforcement tools to assist with escalating enforcement when necessary.</p>

<b>C.5.f.iii.(1), (2), (3) ► Spill and Discharge Complaint Tracking</b>		
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))	749	
Discharges reaching storm drains and/or receiving waters (C.5.f.iii.(2))	3	100
Discharges resolved in a timely manner (C.5.f.iii.(3))	3	100
Comments: <b>The City receives a large number of spills and discharge complaints pertaining primarily to illegal dumping of hazardous materials and other debris, as reported herein. Larger numbers of residents are becoming aware of the incidence of illegal dumping of serious contaminants and have contacted the City to remedy the issues. It is anticipated that if FY14/15 this will be a major issue for the Public Works and Transportation Commission as well as the City Council to address. Discharges that reached stormdrains did NOT reach water bodies as the site was secured and the stormdrain inlets were vactored out prior to full discharge.</b>		

<b>C.5.f.iii.(4) ► Summary of major types of discharges and complaints</b>
Provide a narrative or attach a table and/or graph.
<p><b>The City continues to be victimized by illegal dumping of hazardous waste and illegal dumping of bulky household materials. Chemicals laden in both the household hazardous waste as well as fire retardants in upholstery fabrics and cushions can be serious contributors to pollution in the San Francisquito Creek and the San Francisco Bay. The City tracks the illegal dumping daily and has included potential remedies in the Long Term Trash Load Reduction Plan, which began implementation starting July 1, 2014. Through this Plan, the City intends to comprehensively address the issue of illegal dumping with enhanced enforcement, or enhanced options for consumers who wish to discard unwanted items. This issue is planned to be presented to the City's Public Works and Transportation Commission and/or the City Council in coming months as this matter is of urgent concern to the community.</b></p>

Section 6 – Provision C.6 Construction Site Controls

<b>C.6.e.iii.1.a, b, c ▶ Site/Inspection Totals</b>		
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)
# 0	# 2	# 13
Comments: 1) The City conducted nine (9) stormwater construction inspections at Cooley Landing during FY 13/14; the second high priority site, Ravenswood Family Health Center, has not been in construction during the rainy season but has had 4 inspections conducted in FY 13/14. 2) The City provides construction inspections at all sites that are under construction. Initial inspections are conducted to ensure appropriate BMPs are in place once grading/demolition permit approval is finalized. Ongoing inspections are conducted as-needed through visual observations. Staff is frequently passing all active construction sites and provides direct inspections as issues are realized. A final construction inspection is required prior to the site being finalized, to ensure all BMPs have been removed upon construction or grading completion.		

<b>C.6.e.iii.1.d ▶ Construction Activities Storm Water Violations</b>		
BMP Category	Number of Violations <sup>10</sup> excluding Verbal Warnings	% of Total Violations <sup>11</sup>
Erosion Control	None	0
Run-on and Run-off Control	None	0
Sediment Control	None	0
Active Treatment Systems	None	0
Good Site Management	None	0
Non Stormwater Management	None	0
<b>Total<sup>12</sup></b>		<b>100%</b>

<sup>10</sup> 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.

<sup>11</sup> Percentage calculated as number of violations in each category divided by total number of violations in all six categories.

<sup>12</sup> 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.

<b>C.6.e.iii.1.e ► Construction Related Storm Water Enforcement Actions</b>			
<b>The City of East Palo Alto did not need to provide any follow-up or escalation for construction related stormwater enforcement issues identified in the two high priority sites that were under construction in FY13/14.</b>			
	<b>Enforcement Action</b> (as listed in ERP) <sup>13</sup>	<b>Number Enforcement Actions Issued</b>	<b>% Enforcement Actions Issued<sup>14</sup></b>
Level 1 <sup>15</sup>	<b>Verbal Warning / Written Notice/Return to Compliance</b>	<b>0</b>	<b>0</b>
Level 2	<b>Warning Notice or Administrative Action</b>	<b>0</b>	<b>0</b>
Level 3	<b>Notice to Comply, Compliance Meeting, or Stop Work Orders Administrative Action with Penalty and/or Cost Recovery</b>	<b>0</b>	<b>0</b>
Level 4	<b>Legal Action</b>	<b>0</b>	<b>0</b>
<b>Total</b>		<b>0</b>	<b>100%</b>

<b>C.6.e.iii.1.f, g ► Illicit Discharges</b>	
<b>The City did not have any illicit discharges from high priority construction sites during FY 13/14.</b>	
	<b>Number</b>
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)	<b>0</b>
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)	<b>0</b>

<b>C.6.e.iii.1.h, i ► Violation Correction Times</b>		
	<b>Number</b>	<b>Percent</b>
<b>Violations (excluding verbal warnings) fully corrected within 10 business days after violations are discovered</b> or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	<b>0</b>	<b>%<sup>16</sup></b>
<b>Violations (excluding verbal warnings) not fully corrected within 30 days after violations are discovered</b> (C.6.e.iii.1.i)	<b>0</b>	<b>%<sup>17</sup></b>
<b>Total number of violations (excluding verbal warnings) for the reporting year<sup>18</sup></b>	<b>0</b>	<b>100%</b>
<b>Comments: The City of East Palo Alto did not have any violations or issues for high priority construction sites that were not resolved within 30 days. The City did not have any stormwater violations at high priority construction sites during FY13/14. All issues identified were contained without direct discharge and remedied prior to any stormwater event and at least within 10 days of the issue being identified.</b>		

<sup>13</sup> Agencies should list the specific enforcement actions as defined in their ERPs.

<sup>14</sup> Percentage calculated as number of each type of enforcement action divided by the total number of enforcement actions.

<sup>15</sup> For example, Enforcement Level 1 may be Verbal Warning.

<sup>16</sup> 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.

<sup>17</sup> 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.

<sup>18</sup> 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.

**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: **During FY 13/14, construction activities were closely monitored as the City had only two active high priority construction sites**

**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 City has continued to implement construction BMPs and stormwater management practices. During FY 13/14, the City 1) conducted inspections with the new forms updated through the SMCWPPP, and 2) participated in the New Development Subcommittee. During this FY, the City has shifted the Public Works inspector to the Building department and has recruited a new Public Works Inspector, due to begin in FY14/15 for construction inspections. The City has also hired a new senior Engineer trained in construction inspections, with construction inspection training being conducted in-house with the new Associate Engineer and Assistant Engineer**  
 Refer to the C.6 Construction Site Control section of the SMCWPPP FY 13-14 Annual Report for a description of activities at the countywide or regional level.  
 For information on the April 23, 2014 Construction Site Stormwater Inspector Training Workshop (attendance list, agenda, etc.) see <http://www.flowstobay.org/trainings>.

**C.6.f ► Staff Training Summary**

Training Name	Training Dates	Topics Covered	No. of Inspectors in Attendance	Percent of Inspectors in Attendance
Construction BMP training	October 23, 2013	Appropriate Construction BMP installation	2	100
Construction BMP training	October 30, 2013	Appropriate Construction BMP installation	2	100
Construction BMP training	February 12, 2014	Appropriate Construction BMP removal/final	2	100
Construction BMP training	February 19, 2014	Appropriate Construction BMP removal/final	2	100

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

**C.7.b.ii.1 ▶ Advertising Campaign**

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

Summary:  
**The City of East Palo Alto supported the Regional Youth Litter Campaign by marketing efforts to promote the Campaign in local free online media, in-person messaging and distribution of flyers to youth and event programs including the Earth Day event, Coastal Cleanup Day and National River Cleanup Day. The following separate report developed by BASMAA summarizes the activities of the Regional Youth Litter Campaign**  
 • **BASMAA Be the Street Campaign Report**

**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 City of East Palo Alto supported the Regional Youth Litter Campaign by marketing efforts to promote the Campaign in local free online media, in-person messaging and distribution of flyers to youth and event programs including the Earth Day event, Coastal Cleanup Day and National River Cleanup Day. Information on the pre-campaign survey for the BASMAA Regional Youth Litter Campaign was provided in the FY 11-12 Annual Report**

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

<input type="checkbox"/>	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal: <a href="#">FY11/12 BASMAA Submittal</a>

**C.7.b.iii.2 ▶ Post-Campaign Survey**

*(For the Annual Report following the post-campaign survey)* Discuss the campaigns and the measureable changes in awareness and behavior achieved. Provide an update of outreach strategies based on the survey results. If survey was done regionally, refer to a regional submittal that contains the following information:

**Information on the post-campaign survey for the BASMAA Regional Youth Litter Campaign was provided in the BASMAA FY 13-14 Annual Report.**

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

<input type="checkbox"/>	Survey report attached
<input checked="" type="checkbox"/>	Reference to regional submittal: <a href="#">FY13/14 BASMAA Annual Report</a>

**C.7.c ▶ Media Relations**

- 1) Topic and content of pitch [See FY13/14 BASMAA Annual Report](#)
- 2) Medium (TV, radio, print, online) [See FY13/14 BASMAA Annual Report](#)
- 3) Date of publication/broadcast [See FY13/14 BASMAA Annual Report](#)

**C.7.d ▶ Stormwater Point of Contact**

Summary of any changes made during FY 13-14:  
**During FY 13/14 the City of East Palo Alto updated the City website, with updated information now available at:**

<http://www.ci.east-palo-alto.ca.us>

**C.7.e ► Public Outreach Events**

Describe general approach to event selection. Provide a list of outreach materials and giveaways distributed. Use the following table for reporting and evaluating public outreach events

Event Details	Description (messages, audience)	Evaluation of Effectiveness
<p>Provide event name, date, and location. Indicate if event is local, countywide or regional.</p> <ol style="list-style-type: none"> <li>1) Coastal Cleanup Day, September 21, 2013, local</li> <li>2) National River Cleanup Day, May 17, 2014, local</li> <li>3) Partnership in Pride Campaign litter cleanup and monthly outreach events</li> <li>4) National Night Out</li> <li>5) Earth Day, April 22, 2014 Citywide Celebration at Bell Street Park</li> <li>6) San Mateo County Fair, June 7-15, 2014, Countywide (See SMCWPPP for summary of this event)</li> </ol> <p>The City provided local distribution of flyers and online outreach of the above referenced campaigns.</p>	<p>Identify type of event (e.g., school fair, farmers market etc.), type of audience (school children, gardeners, homeowners etc.) and outreach messages (e.g., Enviroscape presentation, pesticides, stormwater awareness)</p> <p><b>The City provides outreach pertaining to pesticides, litter reduction, car washing and illegal dumping and trash load reduction.</b></p>	<p>Provide general staff feedback on the event (e.g., success at reaching a broad spectrum of the community, well attended, good opportunity to talk to gardeners etc.). Provide other details such as:</p> <ol style="list-style-type: none"> <li>1) About 1700 East Palo Alto residents (in total) participated in these events.</li> <li>2) About 600 residents visited the Partnership in Pride campaign booth or registration tables to obtain information specific to stormwater compliance targets.</li> <li>3) Highly successful outreach efforts to engage the public and provide varied activities for engagement. Ongoing efforts involve the community distributing outreach pertaining to illegal dumping and trash load reduction.</li> <li>4) Programs are well-attended and well-received with more and more residents taking action and preferring to eliminate trash in an effort to improve the image of their City. Residents also obtain valuable information about healthy family materials such as OWOW outreach, resulting in exposure to cleaner products in their homes. Residents are engaged and highly motivated to improve their City.</li> </ol>

**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:

- 4) Efforts undertaken
- 5) Major accomplishments

Summary:

**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 13-14 Annual Report.**

**The City of East Palo Alto has been working with local stewardship groups including local water monitoring high school programs to assist with educating students about the importance of monitoring the watershed, reducing the incidence of pollution, and public information and involvement to secure future generations of watershed protectors. This partnership is expanding through the Partnership in Pride campaign wherein local groups are becoming involved in such efforts as on-land litter abatement, graffiti removal, and illegal dumping to reduce the impact of these pollutants on the waterways. The City has monthly cleanups and has continued to seek "adoption" of areas of the city. It is estimated that this effort is responsible for significant trash abatement efforts during this reporting period, including a large portion of the City's trash abatement goals. It is anticipated that the Partnership in Pride Campaign will be a**

significant contributing tool utilized to help the City meet future trash load reduction goals, among other MRP sub-sections.

**C.7.g. ► Citizen Involvement Events**

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

Event Details	Description	Evaluation of effectiveness
Provide event name, date, and location. Indicate if event is local, countywide or regional  1) Coastal Cleanup Day, September 21, 2013, local, San Francisquito Creek, O'Connor Pump Station 2) National River Cleanup Day, May 17, 2014, local, San Francisquito Creek 3) Partnership in Pride Campaign events (monthly), local, various sites; weekly events during summer	Describe activity (e.g., creek clean-up, storm drain marking etc.)  1-2) Cleanup of San Francisquito Creek at City border and just before the City pump station to "no visual impairment" standards twice a year with community watershed monitoring groups, local non-profits and faith-based organizations, and volunteers 3) Cleanup of various sites throughout the City to "no visual impairment standards" monthly, as determined by community group interests; during summer, cleanup of various blighted areas of the City by local youth group organizations	Provide general staff feedback on the event. Provide other evaluation details such as:  1) CCD & NRCD typically has about 120 volunteers per event (total 240); 2) Distance of San Francisquito Creek Cleaned: 1.2 miles; upland of waterway is about 2 miles of shoreline near the pump station; 3) Quantity of trash and recyclables removed away of trash hot spot is highly variable and significant in volume. In the "trash hot spot" of San Francisquito Creek, this material is carefully documented with a trend of the trash collected and quantified at 3.6 cubic yards. This material was the most significant during FY13/14 due to a large number of volunteers who turned out and removed very large debris along the wall at the lower end of the San Francisquito Creek in the upper bank; this area had not been abated for several years due to high water levels and inaccessibility.  4) The trend of litter abatement throughout the creek is continuously declining. Trends of litter removal for on-land activities is declining in areas where consistent efforts are on-going, but remains a significant impairment throughout a majority of the City.

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

Summarize school-age children outreach programs implemented. A detailed report may be included as an attachment. Use the following table for reporting school-age children outreach efforts.

Program Details	Focus & Short Description	Number of Students/Teachers reached	Evaluation of Effectiveness
Refer to the C.7 Section of SMCWPPP's FY 13-14 Annual Report for a description of School-age Children Outreach efforts conducted at the countywide level.	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.
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	8 classes, 240 students	80% of teachers returned postage-paid evaluation postcard, with a cumulative rating of 5 out of 5 in both quality of program and clarity of presenter. 100% stated students' understanding of the difference between storm drain/sewer systems increased, and 99% stated students'

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	<p>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</p>		<p>understanding of what they can do to prevent water pollution increased as well.</p>
<p>City of East Palo Alto Partnership in Pride Campaign Classroom Presentations</p>	<p>Scheduled presentations to High School students at Menlo Atherton High School Environmental Chemistry courses regarding watershed monitoring, pollutants of concern, and litter abatement.</p>	<p>5 classes with an average of 30 students each for a total of 150 students.</p>	<p>Evaluation used is engagement in watershed monitoring campaign based on teacher feedback regarding monitoring data collected indicates that students are engaged and students from the course who live in East Palo Alto are much more actively involved and interested in the watershed of the San Francisquito Creek than prior to outreach activities. Students collect more samples and participate in San Francisquito Creek cleanup activities at about 25% rate compared to about 10% rate of participation prior to classroom presentation.</p>
<p>Banana Slug String Band</p>	<p>Scheduled presentations to school aged students about watershed protection and pollution prevention.</p>	<p>Two classes with an average of 200 students</p>	<p>Evaluation used is a classroom survey and teacher feedback regarding the presentation. More information is provided in the SMCWPPP Annual Report C.7.h.</p>

**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 13-14, 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 the Program, BASMAA RMC and the RMP, see SMCWPPP's March 2014 Integrated Monitoring Report, Part A.

The City further collaborates with local educational programs to assist with information gathering and data collection from students who are monitoring the local watershed. The program partnership has the potential of providing ongoing data regarding the upstream runoff conditions, albeit of limited quality due to the training limitations of the data collectors. However, this program is likely to prove useful in establishing more eyes on the watershed and provide more collaborative effort with the residents and watershed program manager.

Section 9 – Provision C.9 Pesticides Toxicity Controls

<b>C.9.b ► Implement IPM Policy or Ordinance</b>					
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. <b>Listed are only quantities of organophosphates, pyrethroids, carbaryl and fipronil that are used in a manner that threatens water quality (i.e., are used outdoors and may come in contact with stormwater.</b>					
Trends in Quantities and Types of Pesticides Used <sup>19</sup>					
Pesticide Category and Specific Pesticide Used	Amount <sup>20</sup>				
	FY 09-10	FY 10-11	FY 11-12	FY 12-13	FY 13-14
<b>Organophosphates</b>	Data unavailable	None Applied	None Applied	None Applied	None Applied
<b>Phantom EPA Reg#241-392</b>	Data unavailable	<b>868 ounces</b>	None Applied	None Applied	None Applied
	Data unavailable	None Applied	None Applied	None Applied	None Applied
<b>Pyrethroids</b>	Data unavailable	None Applied	None Applied	None Applied	None Applied
<b>*Cy-Kick CS .05%</b> <b>* Note, reporting references two types of materials, diluted and concentrated.</b>	Data unavailable	None Applied	<b>1585 ounces (diluted)</b>	<b>2489 ounces (diluted)</b>	<b>1.1 ounces (concentrated)</b>
<b>Temp Ultra EPA Reg#431-1363 diluted ounces</b>	Data unavailable	<b>2396 ounces (diluted)</b>	<b>1235 ounces (diluted)</b>	<b>2713 ounces (diluted)</b>	None Applied
<b>Carbaryl</b>	Data unavailable	None Applied	None Applied	None Applied	None Applied
<b>Fipronil</b>	Data unavailable	None Applied	None Applied	None Applied	None Applied

<b>C.9.c ► Train Municipal Employees</b>	
Enter the number of employees that applied or used pesticides (including herbicides) within the scope of their duties this reporting year.	<b>8</b>
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within the last 3 years.	<b>8</b>
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.	<b>8</b>

<sup>19</sup> Includes all municipal structural and landscape pesticide usage by employees and contractors.

<sup>20</sup> 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, bifenthrin, beta-cyfluthrin, bioallethrin, cyfluthrin, cypermethrin, cyphenothrin, deltamethrin, esfenvalerate, etofenprox, fenpropathrin, gamma-cyhalothrin, imiprothrin, lambda-cyhalothrin, metofluthrin, permethrin, phenothrin, prallethrin, resmethrin, sumithrin (d-phenothrin), tau-fluvalinate, tefluthrin, tetramethrin, tralomethrin, cis-permethrin, and zeta-cypermethrin.

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C.9.d ▶ Require Contractors to Implement IPM			
Did your municipality contract with any pesticide service provider in the reporting year?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, attach one of the following:			
<input checked="" type="checkbox"/>	Contract specifications that require adherence to your IPM policy and standard operating procedures, OR		
<input type="checkbox"/>	Copy(ies) of the contractors' IPM certification(s) or equivalent, OR		
<input type="checkbox"/>	Equivalent documentation.		
If <b>Not attached</b> , explain:			

C.9.e ▶ Track and Participate in Relevant Regulatory Processes	
Summarize participation efforts, information submitted, and how regulatory actions were affected <b>OR</b> reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.	
Summary: <b>During FY 13-14, we participated in regulatory processes related to pesticides through SMCWPPP, BASMAA and CASQA. For additional information, see the regional report submitted by BASMAA on behalf of all MRP Permittees.</b>	

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?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, provide a summary of improper pesticide usage reported to the County Agricultural Commissioner and follow-up actions taken to correct any violations. A separate report can be attached as your summary.			

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); <b>OR</b> reference a report of a regional effort for public outreach in which your agency participates.	
Summary: <b>See the C.9 Pesticides Toxicity Control section of the SMCWPPP FY 13-14 Annual Report for information on point of purchase public outreach conducted countywide and regionally.</b>	

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); <b>OR</b> reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.	
Summary: <b>See the C.9 Pesticides Toxicity Control section the SMCWPPP FY 13-14 Annual Report for a summary of our participation in and contributions towards countywide and regional public outreach to pest control operators and landscapers to reduce pesticide use. The City regularly works with Home Depot to ensure the OWOW product line is prominently displayed and provides the materials at outreach events described in C.7 herein.</b>	

Section 10 - Provision C.10 Trash Load Reduction

**C.10.a.iii ▶ Minimum Full Trash Capture**

Provide the following:

- 1) Descriptions of actions/tasks completed towards achieving the Minimum Full Trash Capture requirement in provision C.10.a.iii. Include the:
  - Total number and types of full capture devices (publicly and privately-owned) installed to-date;
  - Total land area (acres) and land areas within each trash generation category (i.e., very high, high, moderate and low) treated by full capture devices (or other types of devices for non-population based Permittees), in comparison to the MRP-required full capture requirements in Attachment J to the MRP; and,
  - Percentage of jurisdictional land areas with very high, high, moderate and low trash generation rates treated by full capture devices.
- 2) A narrative summary of maintenance activities implemented for each device, group of devices, or device type, including descriptions of typical maintenance frequencies and issues associated with maintaining these devices.

**Descriptions of Actions/Tasks (Conducted or Planned):**

- **The City installed 38 Full trash capture baskets into the storm drainage system July 1, 2014. The total area treated by all devices is 55 acres, 11% of the acreage included in all trash load areas, and while the required minimum treatment area in MRP Attachment J was 18 acres. As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the**

**Descriptions of Maintenance Activities:**

- **The City maintained each trash capture device twice a year—prior to the rainy season in October, 2013 and at the end of the rainy season in May, 2014. Between these scheduled clean outs, the City maintains these devices as-needed with monthly inspections during the rainy season, or as calls of complaints/concern come in.**

**C.10.b.iii ▶ Trash Hot Spot Assessment**

Provide the volume of material removed during each MRP-required Trash Hot Spot cleanup during each fiscal year, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources in FY 2013-14 to the extent possible.

The City has ongoing cleanup programs at the City's Trash Hot Spot, San Francisquito Creek. During FY 13/14, the City cleaned and collected debris from the creek during National River Cleanup Day, the third Saturday each May and during Coastal Cleanup Day, the third Saturday of each September. These efforts are helpful to assess the trash loads in the San Francisquito Creek during the end of the prior wet season and just before the beginning of the next wet season. Generally, the trash load is going down. One of the dominant sources of trash has been single use plastic bags, which have seen a significant drop in the last year. The most frequent source of trash during FY13/14 has been single use beverage containers and single use food packaging. However, there has been a huge increase in the number of spray paint cans lining the creek bed, which is of ongoing concern; it is expected that the increase is due to dry weather/drought conditions resulting in a larger number of people entering the creek bed for activities, both recreational and illicit. During a pre-inspection of the Creek in May 2013, City staff identified graffiti in-progress and requested that the individuals remove all materials associated with their creekbed activities. Since this time, bags of trash have been consistently removed from the creekbed and placed near a public trash container for pick-up.

**C.10.b.iii ► Trash Hot Spot Assessment**

Provide the volume of material removed during each MRP-required Trash Hot Spot cleanup during each fiscal year, and the dominant types of trash (e.g., glass, plastics, paper) removed and their sources in FY 2013-14 to the extent possible.

Trash Hot Spot	FY 13-14 Cleanup Date	Volume of Trash Removed (cubic yards)				Dominant Type(s) of Trash FY 2013-14	Trash Sources in FY 2013-14 (where possible)
		FY 2010-11	FY 2011-12	FY 2012-13	FY 2013-14*		
EPA01	9/21/2013	9.7	3.5	1.6	3.6	Convenience/Fast Food items, Bottles (plastic or glass), Aluminum cans, Paper and cardboard, Other plastic products, Sports balls	Litter, Illegal dumping, Homeless encampments, Trash accumulation

\*The City of East Palo Alto performed multiple cleanups of their MRP-required trash hot spots during FY 13-14. The volume reported in this section represents the total volume removed from the first round of trash hot spot cleanups. The volume of material removed from other cleanups is reported as the Estimated % Trash Reduction due to Creek/Shoreline Cleanups (All TMAs) in Section C.10. Part C - Estimated Overall Trash Load Reduction.

C.10.c ► Long-Term Trash Load Reduction Plan	
<p>Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014. Describe significant changes made to primary or secondary trash management areas (TMA), trash generation maps, control measures, or time schedules identified in your plan.</p> <p><b>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</b></p>	
Description of Significant Revision(s)	Associated TMA
No significant revisions were made to the baseline assessment of the City's 8 Trash Management Areas.	1-8

<b>C.10.d ► PART A - Trash Control Measure Implementation and Assessment (Jurisdictional-wide Actions)</b>				
Provide a description of each jurisdictional-wide trash control measure implemented to-date. Identify the dominant trash source(s) and dominant type(s) of trash addressed by each control measure. For each jurisdictional-wide measure, identify the trash assessment method(s) used to demonstrate on-going reductions, summarize the results of the assessment(s), and estimate the associated reduction of trash within your jurisdictional area.				
<b>Control Measure</b>	<b>Summary Description of Control Measure &amp; Dominant Trash Sources and Types</b>	<b>Assessment Method(s)</b>	<b>Summary of Assessment Results To-date</b>	<b>Estimated % Trash Reduced</b>
Single-use Plastic Bag Ordinance or Policy	Adoption of the San Mateo Countywide Reusable Bag Ordinance requiring the elimination of single use plastic bags and a charge for reusable paper and heavy plastic bags.	Inspections and creek assessments	Large success with very few single use plastic bags in the waterway and no non-compliance issues with local retail establishments.	7%
Expanded Polystyrene Food Service Ware Ordinance or Policy	Not presently adopted.	Not presently adopted.	Not presently adopted.	Not presently adopted.
Public Education and Outreach Programs Targeted at Trash Reduction and Implemented post-MRP Adoption	Partnership in Pride Campaign is a local partnership between City staff, local businesses, non-profits, faith based organizations and residents to provide community outreach regarding litter abatement, bulky waste cleanups, illegal dumping activities, and overall blight abatement. The cleanup activities focus on wind and stormwater conveyance modes of litter distribution of primarily single use packaging.	On-land litter assessments.	Thus far, community cleanup efforts have reduced litter at an estimated 25% load reduction when compared with pre-MRP conditions. However, these credits are taken according to on-land assessments of TMAs. 1% reduction is provided for the outreach component, which is spreading the awareness of all trash load program options.	1%

Control Measure	Summary Description of Control Measure & Dominant Trash Sources and Types	Assessment Method(s)	Summary of Assessment Results To-date	Estimated % Trash Reduced
Single-use Plastic Bag Ordinance or Policy	The City Council adopted the San Mateo County Reusable Bag Ordinance on April 19, 2012 for implementation October 1, 2012. This prohibits the distribution of single-use plastic bags and requires a \$0.10 fee be assessed for paper or heavy plastic bags.	Inspections and hot spot assessments are conducted to assess the effectiveness of the control measure in reducing trash from entering the municipal stormwater conveyance system. The City developed its % trash reduced estimate using the following assumptions: 1.) Single use plastic bags comprise 8% of the trash discharged from stormwater conveyances, based on the Regional Trash Generation Study conducted by BASMAA;	Results of assessments conducted by the County of San Mateo on behalf of all municipalities in San Mateo County indicate that the City's ordinance is effective in reducing the number of single use plastic bags in stormwater discharges. This preliminary conclusion is based on the very small number of complaints received from customers about businesses in San Mateo County that are continuing to use single use plastic bags after ordinances were adopted.	Assuming single use bags are 8% of the trash observed in stormwater discharges, the City concludes that there has been a 7% (i.e., 8% x 86% effectiveness in reducing bags) reduction in trash in stormwater discharges as a result of the City's ordinance.
Expanded Polystyrene Food Service Ware Ordinance or Policy	The City of East Palo Alto does not have a polystyrene food service ware ordinance or policy.	2) 95% of single use plastic bags distributed in the City/County are affected by the implementation of the ordinance, based on the County of San Mateo's Environmental Impact Report; and 3) Of the bags affected by the ordinance, there are now 90% less bags being distributed, based on customer complaints received by the County of San Mateo's Department of Environmental Health Services. This is conservative estimate given that in FY 13-14 Environmental Services only received complaints about 4, of the over 1900 businesses in San Mateo County that are affected by the single-use plastic bag ordinances, and the fact that staff inspections have indicated no violations of this ordinance.		
Public Education and Outreach Program	On behalf of the City, SMCWPPP and BASMAA also implemented public education and outreach actions at the countywide and regional scales that were targeted at reducing the impacts of trash on local water bodies. For descriptions of these activities, please see Section 7 of the Program's Annual Report. The City provided a large number of litter abatement events during FY13-14; see section 7 of this annual report for details as these events focused on all types of sourced litter.			

**C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)**

Complete the following trash control measure implementation and assessment summary for each primary trash management area (TMA) identified in your Long-term Plan. Include the following information:

- Identify the total jurisdictional area and the % of that area that generates very high (VH), high (H), moderate (M), or low (L) levels of trash;
- Identify the dominant trash source(s) and dominant type(s) of trash addressed or to-be addressed in the TMA;
- Include the area currently treated by full capture devices, the quantity and type of devices installed to-date, and the % of jurisdictional area that generates very high (VH), high (H), moderate (M), and low (L) levels of trash after accounting for reductions via full capture devices;
- Summarize control measures other than full capture devices implemented to-date, distinguishing between implementation that began pre- and post-MRP effective date. If not implemented in the entire TMA, describe generation category targeted and % of TMA addressed;
- Provide the % of the jurisdictional area that generates very VH, H, M or L levels of trash after accounting for all control measures implemented to-date;
- Describe the methods used to evaluate the effectiveness of control measures other than full capture devices, and any assessment results to-date. If the method was not implemented in the entire TMA, describe generation category targeted and %of TMA addressed; and
- Provide an estimate of the % of trash reduced in the TMA and jurisdiction-wide.

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
1	482	Pedestrian, vehicular and illegal dumping	Single use beverage containers; single use food packaging, single use plastic bags, household items, hazardous waste	Baseline Generation (Pre-MRP)	0%	95%	4%	1%
Area Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA		Summary Descriptions of Full Trash Capture Devices (Quantity and Type)		After taking into account Full Capture Devices	0%	87%	2%	11%
Total Area (Acres)	55	38 Full trash capture devices with stormdrain pipe screens.						
% of TMA	11%							
% of VH/H/M	11%							
Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices				After taking into account All New or Enhanced (post MRP) Control Measures	0%	0%	89%	11%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight, which has yielded significant positive results and will be enhanced. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets. TMA has been an area of focus for the Partnership in Pride Campaign and has realized significant reductions due to litter abatement efforts, reducing this area largely from high to moderate trash load.</p>								
<p><b>Assessment Methods for Control Measures Other than Full Capture Devices</b></p> <p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</p>								
<p><b>Summary of Assessment Results To-date</b></p> <p>In July 2014, a total of 8 sites or 8,400 linear feet (6%) of streets and sidewalks were assessed in this TMA using the on-land visual assessment protocol. Only areas with M, H or VH generation rates were assessed. For those areas assessed, 100% were M. In July 2014, a total of 8 sites or 8,400 linear feet (6%) of streets and sidewalks were assessed in this TMA using the on-land visual assessments. Only areas with M, H or VH generation rates were assessed. Based on the results of these assessments, the area in this TMA where control measures other than full capture devices are implemented was determined have a 100% moderate levels of trash. The results to the right include not only the reduction observed via on-land assessments, but also via full capture devices (as applicable).</p>								
Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions					77%			
Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions					37%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
2	228	Pedestrian, vehicular & illegal dumping	Single use beverage containers; single use food packaging, single use plastic bags, household items, hazardous waste	Baseline Generation (Pre-MRP)	0%	99%	0%	1%
Area <sup>1</sup> Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA		Summary Descriptions of Full Trash Capture Devices (Quantity and Type)		After taking into account <u>Full Capture Devices</u>	0%	99%	0%	1%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices				After taking into account <u>All New or Enhanced (post MRP) Control Measures</u>	0%	99%	0%	1%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
Assessment Methods for Control Measures Other than Full Capture Devices								
<p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</p>								
Summary of Assessment Results To-date								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions					0%			
Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
3	50	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	100%	0%	0%
Area <sup>1</sup> Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA		Summary Descriptions of Full Trash Capture Devices (Quantity and Type)		After taking into account <u>Full Capture Devices</u>	0%	100%	0%	0%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices				After taking into account <u>All New or Enhanced (post MRP) Control Measures</u>	0%	100%	0%	0%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
Assessment Methods for Control Measures Other than Full Capture Devices								
<p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</p>								
Summary of Assessment Results To-date								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions					0%			
Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
4	94	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	0%	100%	0%
Area <sup>1</sup> Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA		Summary Descriptions of Full Trash Capture Devices (Quantity and Type)		After taking into account <b>Full Capture Devices</b>	0%	0%	100%	0%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices				After taking into account <b>All New or Enhanced (post MRP) Control Measures</b>	0%	0%	100%	0%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
Assessment Methods for Control Measures Other than Full Capture Devices								
<p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</p>								
Summary of Assessment Results To-date								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
				Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions	0%			
				Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions	0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
5	162	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	17%	83%	0%
<b>Area Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA</b>		<b>Summary Descriptions of Full Trash Capture Devices (Quantity and Type)</b>		After taking into account <u>Full Capture Devices</u>	0%	17%	83%	0%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
<b>Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices</b>				After taking into account <u>All New or Enhanced (post MRP) Control Measures</u>	0%	17%	83%	0%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
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<b>Summary of Assessment Results To-date</b>								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
<b>Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions</b>					0%			
<b>Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions</b>					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
6	116	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	100%	0%	0%
<b>Area<sup>1</sup> Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA</b>		<b>Summary Descriptions of Full Trash Capture Devices (Quantity and Type)</b>		<b>After taking into account Full Capture Devices</b>	0%	100%	0%	0%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
<b>Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices</b>				<b>After taking into account All New or Enhanced (post MRP) Control Measures</b>	0%	100%	0%	0%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
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<p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report.</p>								
<b>Summary of Assessment Results To-date</b>								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
<b>Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions</b>					0%			
<b>Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions</b>					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
7	102	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	0%	100%	0%
<b>Area Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA</b>		<b>Summary Descriptions of Full Trash Capture Devices (Quantity and Type)</b>		After taking into account <b>Full Capture Devices</b>	0%	0%	100%	0%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	0%							
<b>Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices</b>				After taking into account <b>All New or Enhanced (post MRP) Control Measures</b>	0%	0%	100%	0%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
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<b>Summary of Assessment Results To-date</b>								
On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.								
<b>Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions</b>					0%			
<b>Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions</b>					0%			

C.10.d ► PART B - Trash Control Measure Implementation and Assessment (TMA Specific Actions)								
TMA ID	TMA Area (Acres)	Dominant Sources	Dominant Types		% TMA in Each Trash Generation Category			
					VH	H	M	L
8	92	Pedestrian and vehicular	Single use beverage containers; single use food packaging, single use plastic bags	Baseline Generation (Pre-MRP)	0%	0%	0%	100%
<b>Area<sup>1</sup> Treated by Full Trash Capture Devices (Acres)/percent of VH,H,M and total percent of TMA</b>		<b>Summary Descriptions of Full Trash Capture Devices (Quantity and Type)</b>		<b>After taking into account Full Capture Devices</b>	0%	0%	0%	100%
Total Area (Acres)	0	See TMA #1						
% of TMA	0%							
% of VH/H/M	--							
<b>Summary Descriptions of Control Measures Implemented Since MRP Adoption, Other than Full Capture Devices</b>				<b>After taking into account All New or Enhanced (post MRP) Control Measures</b>	0%	0%	0%	100%
<p>The City has greatly enhanced community awareness of the litter and illegal dumping of trash in the community. Partnership in Pride Campaign has become an "adopt a street" campaign wherein church leaders and non-profit groups are committing to trash load reduction efforts in areas they are committed to reducing blight. The City has enhanced street sweeping throughout this trash management area by restricting parking and enforcing when vehicles are parked during street sweeping times. The City has also maintained the trash capture baskets twice a year and more often, as needed to address the trash accumulation in the stormdrain inlets.</p>								
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<p>As part of the City's Long-Term Trash Reduction Plan, we worked collaboratively with other SMCWPPP Permittees to develop our Pilot Trash Assessment Strategy (Strategy), which was submitted to the Water Board in Feb 2014. For areas where control measures other than full capture devices have been implemented, visual on-land trash assessment is the method used to determine the current level of trash in a TMA. Assessments are conducted using a protocol developed by BASMAA member agencies. For each TMA assessed, sites are selected using a probabilistic sample draw to randomly pick sites in a TMA and allow for extrapolation of results within an applicable TMA. Additionally, trash assessment sites may also be targeted to specific streets and properties (these results are not extrapolated). Changes in the level of trash observed via on-land assessments, along with the associated trash generation rates are then used to calculate reductions in trash to-date. The results of the assessments conducted in FY 13-14 are presented below. Additional information on the Strategy, the results of initial assessments, and the method used to calculate % reductions can be found in the Program's FY 13-14 Annual Report. This trash management area represents areas of the City that are unlikely to contribute much, if any trash inputs into local waterways.</p>								
<b>Summary of Assessment Results To-date</b>								
<p>On-land visual assessments were not conducted in this TMA in FY 13-14 and therefore no load reductions associated control measures other than full capture devices are assumed to have occurred. Assessments may be conducted in subsequent years.</p>								
				<b>Estimated % Trash Reduction in TMA due to New or Enhanced Post-MRP actions</b>	TMA generates a level of trash that does not adversely affect water quality and therefore no reductions are needed.			
				<b>Estimated % Trash Reduction Jurisdiction-wide due to New or Enhanced Post-MRP actions</b>	NA			

**C.10.d ► PART C – Estimated Overall Trash Load Reduction**

For Population-based Permittees, provide an estimate of the overall trash reduction percentage achieved to-date within the jurisdictional area of your municipality that generates problematic trash levels (i.e., Very High, High or Moderate trash generation). Base the estimate on the information presented in C.10.d – Parts A and B and creek/shoreline cleanups not reported in C.10.b.iii. Provide a statement regarding the confidence in the estimate and challenges and/or successes in measuring progress towards the 40% trash reduction target described in provision C.10.

**Discussion of Trash Reduction Estimate:**

**The City has reduced the overall trash load by roughly 45% since the adoption of the MRP in 2009. This estimate is based on proactive efforts to reduce the incidence of trash flowing to the stormdrain system outfalls through the following primary efforts:**

- Enhanced maintenance activities and the installation of full trash capture devices;
- Reusable Bag Ordinance essentially eliminating single use plastic bags from City boundaries;
- Improved street sweeping efforts through installation of signage and enhanced enforcement ensuring street sweeping is more effective;
- Partnership in Pride Campaign with local volunteers dedicated to litter abatement and outreach distribution throughout the community, but with special focus in the TMA of significance.

While the City did conduct significant on-land cleanups through the Partnership in Pride Campaign volunteer efforts, the quantity of trash/percentages are not being reported here as the efforts were translated to enhancements in the trash loads realized through assessments and would thereby be double-counted control efforts.

Estimated % Trash Reduction due to Jurisdictional-wide Actions	<b>8%</b>
Estimated % Trash Reduction due to Trash Full Capture Devices (All TMAs)	<b>4%</b>
Estimated % Trash Reduction due to Other Control Measures (All TMAs)	<b>33%</b>
<b>SubTotal for Above Actions</b>	<b>45%</b>
Estimated % Trash Reduction due to Creek/Shoreline Cleanups (All TMAs)	<b>0</b>
<b>Total Estimated % Trash Reduction in FY 13-14</b>	<b>45%</b>

Section 11 - Provision C.11 Mercury Controls

**C.11.a.i ► Mercury Recycling Efforts**

List below or attach lists of efforts to promote, facilitate, and/or participate in collection and recycling of mercury containing devices and equipment at the consumer level (e.g., thermometers, thermostats, switches, bulbs).

**Refer to SMCWPPP's FY 2013/14 Annual Report for details regarding countywide efforts to promote and facilitate collection and recycling of mercury containing devices and equipment at the consumer level through San Mateo County Health Department's Household Hazardous Waste (HHW) Program and Very Small Quantity Generator Business Collection (VSQG) Program.**

- 1) **Promotion (i.e., media advertising, providing information on your agency's website, etc.) of:**
  - a) **Household Hazardous Waste (HHW) programs:** The City promotes Home Depot, IKEA, and the door-to-door service provided by subcontract through Recology and ReThink Waste through our postcard mailer aimed at reducing household hazardous waste in the landfill. These postcards are distributed vial direct mailing as well as hand delivered through the City's community-based Partnership in Pride events.
  - a) **Mercury-containing devices and equipment by your municipality or contractors at individual residences.** Recology of San Mateo collects used/waste batteries and fluorescent bulbs at the time of scheduled pickup. Refer to the San Mateo County Annual report for an estimated mass of mercury collected.

**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.

**Guidance:**

**Refer to the FY 13-14 SMCWPPP Annual Report for an estimate of the mass of mercury collected through the San Mateo County Health Department's Household Hazardous Waste (HHW) Program and Very Small Quantity Generator Business Collection (VSQG) Program.**

**City of East Palo Alto reports only on collection activities specific to government facilities mercury collection and recycling as reported herein. Recycling of the mercury containing equipment is ongoing and will be reported upon sending materials to collection facility.**

Mercury Containing Device/Equipment	Total Amount of Devices Collected	Estimated Mass of Mercury Collected
Fluorescent Lamps <sup>21</sup> (linear feet)	None Recycled FY13/14	None Recycled FY13/14
CFLs <sup>22</sup> (each)	None Recycled FY13/14	None Recycled FY13/14
Thermostats <sup>23</sup> (each)	None Recycled FY13/14	None Recycled FY13/14
Thermostats (lbs)	None Recycled FY13/14	None Recycled FY13/14
Thermometers (each)	None Recycled FY13/14	None Recycled FY13/14
Switches (lbs)	None Recycled FY13/14	None Recycled FY13/14
<b>Total Mass of Mercury Collected During FY 2013-2014:</b>		None Recycled FY13/14

<sup>21</sup> Only linear fluorescent lamps should be included

<sup>22</sup> Only compact fluorescent lamps should be included

<sup>23</sup> Thermostats can be reported by quantity or by pounds. Whichever unit is used, please avoid double-counting.

- 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 Program's FY 13-14 Annual Report and March 2014 Integrated Monitoring Report, Parts B and C.](#)

Permittee Name: **City of East Palo Alto**

**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:

Two inspectors have been trained on PCB identification for inspections of businesses and illicit discharges. On one occasion, home based metal recyclers were recycling metals and wiring from scrap materials obtained through "FREE METAL RECYCLING." In this instance, there was consideration for the potential of PCB contamination and the San Mateo County Environmental Health Hazardous Waste Inspector was referred to the site for a joint inspection to ascertain whether the threat was potential or real. The City works jointly to address PCB potentially contaminated sites as well and will incorporate LID into local roadway projects for areas where historical land use indicates old industrial sites which may harbor legacy PCBs. During redevelopment plan submittals, the City invites DTSC, DPH and the Water Board to interject conditions of approval on sites that may have a history of containing PCBs.

**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 PCBs Controls section of Program's FY 13-14 Annual Report and March 2014 Integrated Monitoring Report, Parts B and C. The City of East Palo Alto is committed to implementing the necessary instruments to comply with PCB reduction goals.

**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 against noncompliance

**SMCWPPP materials and efforts are used for local implementation by providing conditions of approval and comments on project applications which limit the use of copper in new building construction. In East Palo Alto, the use of copper for building architecture is extremely rare. As such, education at the counter has been consistent and no enforcement actions have been required as there is little or no use of architectural copper in the City limits.**

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

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

Summary

**The City has found little or no evidence that copper is being used in local industries. Metal fabricators have been under inspection by San Mateo County and no copper sources have been reported.**

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

Note: There are no reporting requirements in the FY 13-14 Annual Report for Section C.14.

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

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

Is your agency a water purveyor?  Yes  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:

**During FY 13/14, the City participated in the SMCWPPP Water Utility Work Group. Due to staffing constraints, the City was unable to attend other workshops. The City implements BMPs as follows:**  
**Various sites throughout the City, discharge water flows directly to dirt or grass especially during main breaks, service lateral breaks and irrigation sprinkler breaks. Most of the time, water flows through the curb/gutter and directly discharges to the storm drain. The pH of water supplied by SFPUC varies between 9- 10 and the water is Chloraminated. The chlorine residual varies between 2.00 – 2.80 mg/L. We use de-chlor tablets and diffusers filled with de-chlor tablets while flushing to ensure pollution protection of our local waterways.**

**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 contracts with American Water Enterprises for water purveyor services and maintenance activity. AWE as Two CSRs, 2 System Operators, One Supervisor and a Superintendent. We have no separate staff for Water Conservation, like other cities. EPA Water System serves about 26,181 persons. We promote a 10% Voluntary Conservation based on the guidelines from BAWSCA / SFPUC. We print Conservation messages in the Message Window of our Water Bills and distribute, Water Saving tips to customers at our Window. Also we investigate high bills and leakages and advise customers when we see higher consumption. If we notice any water wastages, we contact the customer and tell them not to waste; typical examples are Irrigation sprinkler breaks, run off from houses on the street etc.**  
**City stormwater compliance staff also participate in water conservation efforts by distributing materials at events identified in C.7 and also including irrigation inspections during installation of stormwater treatment measures; the City further includes water reduction outreach during Commercial/Industrial inspections, requiring damaged or leaking irrigation lines to be repaired/replaced as part of the source reduction requirements of the inspection. The City utilizes SMCWPPP and BASWCA outreach to promote this implementation. With recent drought concerns, the City has enhanced its vigilance in eliminating leaking irrigation lines by increasing outreach.**

FY 2013-2014 Annual Report

Permittee Name: **City of East Palo Alto**

C.15 – Exempted and Conditionally Exempted Discharges

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Hyd # 93, Grid #9	Hyd Flushing / System Maintenance	Storm Drain	8/16/13	0905 to 0910	1000	200 GPM	.02	9.4	0.65	Flushed fill the water cleared.
Hyd # 135, Grid # 13	Routine flushing & system maintenance	Storm Drain	10/4/13	1350 to 1400	2000	200 GPM	N/A	N/A	N/A	Collect all data for system maintenance
Hyd # 6, Grid # 2	Hyd Flushing / System Maintenance	Storm Drain	10/17/13	1154 to 1158	1400	350 GPM	.01	9.4	51.6	N/A
Hyd # 195, Grid # 18 in front of 107 Daphne Wy	Routine flushing & system maintenance	Storm Drain	10/21/13	1530 to 1540	3500	350 GPM	0.15	9.7	32.4	N/A
Hyd # 260, Grid # 12 in front of 2115 Myrtle St	Hyd Flushing / System Maintenance	Storm Drain	10/21/13	1610 to 1615	1500	300 GPM	0.07	9.6	6.4	N/A
Grid # 9	Routine flushing & system maintenance	Storm Drain	10/22/13	1530 to 1534	1200	300 GPM	.016	9.6	54.8	Hydrant not listed on map. Will include all HYD data for map updates.
Hyd # 251, Grid # 9	Hyd Flushing / System Maintenance	Storm Drain	10/22/13	1515 to 1519	1400	350 GPM	0.14	9.4	40.7	N/A
Hyd # 89, Grid # 9	Routine flushing & system maintenance	Storm Drain	10/23/13	1530 to 1540	4500	450 GPM	0.36	9.3	96.4	N/A
Hyd # 105, Grid # 9	Routine flushing & system maintenance	Storm Drain	10/23/13	1015 to 1025	4500	450 GPM	0.1	9.8	100	N/A
Hyd # 99, Grid # 12	Routine flushing & system maintenance	Storm Drain	10/23/13	0955 to 1000	2000	400 GPM	0	9.7	0	N/A
Hyd # 156, Grid # 15	Routine flushing & system maintenance	Storm Drain	10/30/13	1130 to 1132	800	400 GPM	0.08	9.6	32.5	N/A
Hyd # 181, Grid # 17	Routine flushing & system maintenance	Storm Drain	10/30/13	1030 to 1100	7500	250 GPM	0	9.2	28.5	N/A
Hyd # 296, Grid # 15	Hyd Flushing / System Maintenance	Storm Drain	11/1/13	N/A	N/A	N/A	N/A	N/A	N/A	Will collect complete data for reporting in the future.
Hyd # 69, Grid # 5	Routine flushing & system maintenance	Storm Drain	11/1/13	N/A	N/A	N/A	N/A	N/A	N/A	Will collect complete data for reporting in the future.
Hyd # 41,	Routine flushing &	Storm Drain	11/20/13	0930 to 0940	3000	300 GPM	0.07	9.6	5.58	N/A

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Permittee Name: **City of East Palo Alto**

C.15 – Exempted and Conditionally Exempted Discharges

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Grid # 10	system maintenance									
Hyd # 254, Grid # 10	Hyd flushing & system maintenance	Storm Drain	11/26/13	1000 to 1005	1500	300 GPM	0.1	9.5	58.4	N/A
Hyd # 107, Grid # 10	Hyd flushing & system maintenance	Storm Drain	11/26/13	0900 to 0905	1250	250 GPM	0	9.4	64.6	N/A
Hyd # 117, Grid # 11	Hyd flushing & system maintenance	Storm Drain	11/26/13	1330 to 1335	1500	300 GPM	0.12	9.2	85.9	N/A
Hyd # 336, Grid # 11	Hyd flushing & system maintenance	Storm Drain	11/26/13	1430 to 1435	1750	350 GPM	0.2	9.5	32.2	N/A
Hyd # 108, Grid # 10	Hyd flushing & system maintenance	Storm Drain	12/19/13	0930 to 0935	1750	350 GPM	0.06	9.7	25.6	N/A
Hyd # 266, Grid # 13	Hyd flushing & system maintenance	Storm Drain	12/19/13	0945 to 0952	1750	250 GPM	0.13	9.4	51.9	N/A
785 Carole Ct	Hyd flushing & system maintenance	Storm Drain	10/22/13	1530 to 1534	1200	300 GPM	0.16	9.6	58.4	N/A
500 Weeks St	2" Stand Pipe	Storm Drain	10/22/13	1110 to 1112	1000	500 GPM	0.3	9.5	64.1	N/A
End of Cypress St	2" Blow off w/stand pipe	Storm Drain	11/20/13	1200 to 1210	3500	350 GPM	0.08	9.4	12.9	N/A
Hyd # 105 End of Buchanan Ct	Hyd flushing & system maintenance	Storm Drain	12/19/2013	1100 to 1105	1750	350 GPM	0.1	9.8	N/A	Will collect complete data for future reporting.
End of Runnymede St	Routine flushing & system maintenance	Storm Drain	12/20/13	0.08	1500	300 GPM	N/A	N/A	N/A	Will collect complete data for future reporting.
Veronica Ct	Blow Off	Storm Drain	12/20/13	0.07	1400	350 GPM	N/A	N/A	N/A	Will collect complete data for future reporting.
End of Runnymede Ct	Routine flushing & system maintenance	Storm Drain	12/20/13	0.08	2000	400 GPM	N/A	N/A	N/A	Will collect complete data for future reporting.
Mandela Ct	Routine flushing & system maintenance	Storm Drain	12/20/14	0.07	400	100 GPM	N/A	N/A	N/A	Will collect complete data for future reporting.
Camellia Ct, Hyd # 190 Grid # 16	Routine flushing & system maintenance	Storm Drain	4/18/14	1440 to 1445	750	150 GPM	0.17	9.3	11.3	N/A
Runnymede	2 ½" Blow off flushing	Storm Drain	5/20/14	1000 to 1015	5235	349 GPM	0.05	9.6	14.5	N/A

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C.15 – Exempted and Conditionally Exempted Discharges

Permittee Name: **City of East Palo Alto**

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Ct	& maintenance									
Hyd # 253, Grid # 9 Tuscany Ct	Routine flushing & maintenance	Storm Drain	4/23/14	1350 to 1355	4260	852 GPM	0.08	9.6	18.3	N/A
Hyd # 105 Buchanan Ct	Hyd flushing & system maintenance	Storm Drain	4/23/14	1335 to 1342	4886	698 GPM	0.05	9.5	14.5	N/A
Garden St	2 ½" Blow Off – flushing maintenance	Storm Drain	4/23/14	1020 to 1027	2443	349 GPM	0.06	9.6	16.2	N/A
Hyd # 259 Sparrow Ct	Hyd flushing & system maintenance	Storm Drain	4/23/14	1410 to 1415	4260	852 GPM	0.05	9.3	28.8	N/A
Hyd # 307, Grid # 15 Mouton Ct	Routine flushing maintenance	Storm Drain	4/18/14	1550 to 1559	8226	914 GPM	0.12	9.6	11.2	N/A
Hyd # 141, Grid # 13 Daisy Ln	Routine flushing maintenance	Storm Drain	4/29/14	1250 to 1256	5112	852 GPM	0.06	9.8	17.6	N/A
Hyd # 142, Grid # 13 O'Connor St	Hyd flushing & system maintenance	Storm Drain	4/29/14	1315 to 1320	1745	349 GPM	0.06	9.4	21	N/A
Hyd # 195, Grid # 15 Daphne Wy	Routine flushing & system maintenance	Storm Drain	4/18/14	0930 to 0935	1745	349 GPM	0.05	9.7	28.8	N/A
Hyd # 4, Grid # 2 Rutgers Ct	Hyd flushing & system maintenance	Storm Drain	6/19/14	1425 to 1430	1710	342 GPM	0.01	9.2	78.2	N/A
Hyd # 18, Grid # 4 Kirkwood Ct	Routine flushing & system maintenance	Storm Drain	7/14/14	1230 to 1245	6000	400 GPM	0	9.4	15	N/A
Hyd # 67, Grid # 5 Demeter St	Routine flushing & maintenance	Storm Drain	6/19/14	1430 to 1437	5964	852 GPM	0.08	9.6	14.5	N/A

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Permittee Name: **City of East Palo Alto**

C.15 – Exempted and Conditionally Exempted Discharges

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Hyd # 319, Grid # 9 Avelar St	Hyd flushing & system maintenance	Storm Drain	5/20/14	1145 to 1150	3490	698 GPM	0.01	9.4	11.4	N/A
Hyd # 196, Grid # 16 Daphne Wy	Hydrant flushing & system maintenance	Storm Drain	1/15/14	1446 to 1452	2100	350 GPM	0.14	8.5	12.6	N/A
Hyd # 193 Grid # 18 Daphne Wy	Hydrant flushing & system maintenance	Storm Drain	1/15/14	1504 to 1508	1400	350 GPM	0.03	8.6	19.2	N/A
Hyd # 144, Grid # 14 , O'connor X Euclid Av	Routine flushing & system maintenance	Storm Drain	1/24/14	1115 to 1120	3900	780 GPM	0.11	8.7	11.2	N/A
Hyd # 18, Grid # 4 Kirkwood Ct	Flow Test for contractor	Storm Drain	2/5/14	1420 to 1425	5250	1050 GPM	0.01	9.5	47.6	N/A
Hyd # 123, Grid # 12	Flow Test for contractor	Storm Drain	2/20/14	1000 to 1005	4750	950 GPM	0.1	9.3	11.3	N/A
Hyd # 45, Grid # 8	Routine flushing & maintenance	Storm Drain	2/27/14	1430 to 1445	9000	600 GPM	0.2	9.2	82.1	N/A
Hyd # 38, Grid # 8	Routine flushing & maintenance	Storm Drain	2/28/14	1330 to 1340	5000	500 GPM	0.2	9.4	70	N/A
Hyd # 80, Grid # 7 Westminster Av X Bay Rd	Hydrant flushing & system maintenance	Storm Drain	2/28/14	1530 to 1545	6000	400 GPM	0.12	9.4	43.2	N/A
633 Runnymede St – New Hyd	Flow test for new Fire Station	Storm Drain	3/8/14	0930 to 0935	5300	1060 GPM	0.16	9.4	53.3	Submit new hydrant info to GIS for future recordkeeping.
Hyd # 56, Grid # 8	Routine flushing & system maintenance	Storm Drain	3/20/14	1040 to 1045	5300	1060 GPM	0.12	9.4	6.93	N/A
Hyd # 20, Grid # 2	Routine maintenance	Storm Drain	3/25/14	1035 to 1050	102000	680 GPM	0.2	9.6	22.5	N/A
Hyd # 21, Grid # 2	Hyd flushing & system maintenance	Storm Drain	3/25/14	1149 to 1206	17340	1020 GPM	0.05	9.7	35.4	N/A
Hyd # 6, Grid # 2	Routine flushing & system maintenance	Storm Drain	3/25/14	1345 to 1400	17850	1190 GPM	0.11	9.4	31.4	N/A

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Permittee Name: **City of East Palo Alto**

C.15 – Exempted and Conditionally Exempted Discharges

C.15.b.iii.(1) ► Planned Discharges of the Potable Water System				Duration of Discharge (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual (mg/L)	pH (standard units)	Discharge Turbidity <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge							
Hyd # 5, Grid # 2 Fordham St @ Stevens Av	Routine flushing & system maintenance	Storm Drain	3/26/14	1440 to 1450	5900	590 GPM	0.11	9.6	122	N/A
Hyd # 25, Grid # 2 Illinois St @ Purdue Av	Routine flushing & maintenance	Storm Drain	3/26/14	1510 to 1520	3500	350 GPM	0.1	9.4	28.9	N/A
Hyd # 66, Grid # 5 Michigan @ Illinois St	Routine flushing & maintenance	Storm Drain	3/26/14	1555 to 1605	4000	400 GPM	0.14	9.4	144	N/A
Hyd # 56, Grid # 8 Montessori School	Routine flushing & maintenance	Storm Drain	4/9/14	1000 to 1007	6818	974 GPM	0.1	9.1	48.4	N/A
Hyd # 194, Grid # 16	Routine flushing & maintenance	Storm Drain	4/16/14	1120 to 1127	4550	650 GPM	0.01	9.6	31.9	N/A
Hyd # 173, Grid # 16	Routine flushing & maintenance	Storm Drain	4/16/14	1230 to 1237	4550	650 GPM	0.13	9.4	42.6	N/A
Hyd # 172, Grid # 16	Hydrant flushing & system maintenance	Storm Drain	4/16/14	1520 to 1525	3900	780 GPM	0.11	9.3	40.7	N/A
Hyd # 191, Grid # 18	Hydrant flushing & system maintenance	Storm Drain	4/16/14	1520 to 1525	3900	780 GPM	0.11	9.3	40.7	N/A
Hyd # 304, Grid # 15	Hydrant flushing & system maintenance	Storm Drain	4/18/14	1501 to 1509	7312	914 GPM	0.14	9.7	14.9	N/A
Hyd # 307, Grid # 15	Hydrant flushing & maintenance	Storm Drain	4/18/14	1550 to 1559	8226	914 GPM	0.12	9.6	11.2	N/A
Hyd # 105, Grid # 9	Routine flushing & maintenance	Storm Drain	4/23/14	1335 to 1342	4886	698 GPM	0.05	9.8	14.5	N/A
Hyd # 253, Grid # 9	Routine flushing & maintenance	Storm Drain	4/23/14	1350 to 1355	4260	852 GPM	0.08	9.6	18.3	N/A
Hyd # 325, Grid # 12	Routine flushing & system maintenance	Storm Drain	4/23/14	1512 to 1517	4280	856 GPM	0.09	9.6	22	N/A
Hyd # 340, Grid # 9 University Av	Hydrant flushing & system maintenance	Storm Drain	4/25/14	0955 to 1005	3400	340 GPM	0	9.8	49	N/A

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C.15 – Exempted and Conditionally Exempted Discharges

Permittee Name: **City of East Palo Alto**

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Hyd # 176, Grid # 16	Routine flushing & system maintenance	Storm Drain	4/24/14	1445 to 1450	1745	349 GPM	0.05	9.7	28.8	N/A
Hyd # 141, Grid # 13	Hydrant flushing & maintenance	Storm Drain	4/29/14	1250 to 1256	2094	349 GPM	0.06	9.8	17.6	N/A
Hyd # 142, Grid # 13	Hydrant flushing & system maintenance	Storm Drain	4/29/14	1315 to 1320	1745	349 GPM	0.06	9.4	21	N/A
Hyd # 338, Grid # 14	Hydrant flushing & system maintenance	Storm Drain	5/1/14	1030 to 1037	7000	1000 GPM	0.05	9.8	30.7	N/A
Hyd # 135, Grid # 13	Hydrant flushing & system maintenance	Storm Drain	5/20/14	1020 to 1025	1745	349 GPM	0.06	9.6	27.3	N/A
Hyd # 138, Grid # 13	Hydrant flushing & system maintenance	Storm Drain	5/20/14	1050 to 1055	1745	349 GPM	0.02	9.6	16.5	N/A
Hyd # 140, Grid # 13	Routine flushing & system maintenance	Storm Drain	5/20/14	1115 to 1120	1745	349 GPM	0.02	9.4	11.15	N/A
Hyd # 142, Grid # 13	Routine flushing & system maintenance	Storm Drain	5/20/14	1130 to 1135	1745	349 GPM	0.05	9.4	11.2	N/A
Hyd # 168, Grid # 16	Routine flushing & system maintenance	Storm Drain	5/28/14	1335 to 1342	2443	349 GPM	0.07	9.7	19.1	N/A
224 Wisteria Dr	Routine flushing & system maintenance	Storm Drain	5/28/14	1405 to 1410	1745	349 GPM	0.03	9.5	30.9	Enter hydrant details for future recordkeeping.
Hyd # 259, Grid # 12	Routine flushing & system maintenance	Storm Drain	6/6/14	N/A	1745	349 GPM	0.14	9.6	2.35	Estimate
Hyd # 198, Grid # 2 Stevens @ Illinois St	Routine flushing & system maintenance	Storm Drain	6/4/14	1005 to 1010	2500	500 GPM	0.07	9.6	9.3	N/A
Hyd # 25, Grid # 2, Illinois Av @ Purdue Av	Routine flushing & system maintenance	Storm Drain	6/4/14	1020 to 1025	2000	400 GPM	0.03	9.3	6.06	N/A
Hyd # 66, Grid # 2 Illinois @ Michigan Av	Routine flushing & system maintenance	Storm Drain	6/4/14	1035 to 1040	2000	400 GPM	0.12	9.4	6	N/A
Hyd # 66, Grid # 2	Routine flushing & system maintenance	Storm Drain	6/1/14	0917 to 0920	5964	852 GPM	0.06	9.8	95	N/A

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C.15 – Exempted and Conditionally Exempted Discharges

Permittee Name: **City of East Palo Alto**

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 <sup>1</sup> (NTU)	Implemented BMPs & Corrective Actions
Hyd # 26, Grid # 2	Routine flushing & system maintenance	Storm Drain	6/1/14	0935 to 0945	9140	914 GPM	0.04	9.6	12.9	N/A
Hyd # 25, Grid # 5	Routine flushing & system maintenance	Storm Drain	6/1/14	1000 to 1040	34080	852 GPM	0.04	9.3	1.03	TC Positives
Hyd # 108, Grid # 5	Routine flushing & system maintenance	Storm Drain	6/1/14	1050 to 1115	22850	914 GPM	0.07	9.5	13.7	TC Positives
Hyd # 2, Grid # 2	Routine flushing & system maintenance	Storm Drain	6/19/14	1340 to 1347	2394	342 GPM	0.05	9.5	13.1	N/A
Hyd # 4, Grid # 4	Routine flushing & system maintenance	Storm Drain	6/19/14	1425 to 1430	1710	342 GPM	0.01	9.2	78.8	N/A
Hyd # 6, Grid # 2	Routine flushing & system maintenance	Storm Drain	6/19/14	1445 to 1452	2394	342 GPM	0.11	9.5	11.2	N/A
Hyd #28, Grid # 5	Routine flushing & system maintenance	Storm Drain	6/19/14	1345 to 1400	5250	350 GPM	0.09	9.8	28.7	N/A
Hyd # 265, Grid # 13	Routine flushing & system maintenance	Storm Drain	6/19/14	1442 to 1500	6156	352 GPM	0.06	9.4	13.6	N/A
Hyd # 263, Grid # 13	Routine flushing & system maintenance	Storm Drain	6/19/14	1515 to 1522	2394	342 GPM	0.03	9.4	9.43	N/A

**C.15.b.iii.(2) ▶ Unplanned Discharges of the Potable Water System<sup>2</sup>**

Site/ Location	Discharge Type	Receiving Waterbody(ies)	Date of Discharge	Discharge Duration (military time)	Estimated Volume (gallons)	Estimated Flow Rate (gallons/day)	Chlorine Residual <sup>3</sup> (mg/L)	pH (standard units) <sup>52</sup>	Discharge Turbidity (Visual) <sup>52</sup>	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time <sup>4</sup>	Inspector arrival time	Responding crew arrival time
E. Bayshore Rd – Ikea FH	Hit & Run	Storm Drain/Dirt	7/2/13	0.50	30000	1000GPM	N/A	N/A	N/A	Purchased & installed new break away joint	N/A	NO	MPFD	N/A
1150 Jervis Av	Leak Very slow leak	Storm Drain	8/19/13	N/A	4800	2 GPM	0.09	8.9	42	Installed Smith Blair #238 tapped full circle repair clamp. New corp & 4' type K copper ¾" pipe	1512	NO	MPFD	2045
476 Wisteria Dr	Main Break	Storm Drain	10/4/13	1340 to 1630	3000	20 GPM	N/A	N/A	N/A	Installed 6"x12"x12" repair clamp. Collect all data for future reporting	N/A	No	1345	N/A
O'Connor St @ Clarke Ave	Main Break	Storm Drain	10/31/2013	N/A	500	N/A	N/A	N/A	N/A	Collect all data for reporting	N/A	NO	N/A	N/A
Hyd # 195, Daphne Wy	Main Break	Storm Drain	1/13/2014	N/A	500 Estimate	N/A	N/A	N/A	N/A	Small loss of water. Collect all data for future reporting	N/A Hit & Run over the weekend	NO	N/A	N/A
1104 Bay Rd	Hit & Run Hydrant	Storm Drain	3/16/14	N/A	1500 estimate	N/A	N/A	N/A	N/A	Small leak from FH. Repairs completed 3/17/14. Collect all data for future reporting.	2248	No	MPFD	N/A

<sup>2</sup> This table contains all of the unplanned discharges that occurred in this FY.

<sup>3</sup> 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.

<sup>4</sup> 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<sup>2</sup>**

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) <sup>3</sup>	pH (standard units) <sup>52</sup>	Discharge Turbidity (Visual) <sup>52</sup>	Implemented BMPs & Corrective Actions	Time of discharge discovery	Regulatory Agency Notification Time <sup>4</sup>	Inspector arrival time	Responding crew arrival time
1123 Mello St	Main Break – 2"	Storm Drain / Dirt	1/30/2014	N/A	4500	150 GPM	N/A	N/A	N/A	Throttled down the flow exposed pipe and installed 2" x 6" clamp. Will collect all data in future.	N/A	No	N/A	N/A
2559 Hazelwood Wy	Main Break	Storm Drain	4/22/14	N/A	4000	200 GPM	N/A	N/A	N/A	Throttled down flow, uncovered pipe under driveway, installed clamps. Will collect all data in future.	N/A	No	N/A	N/A
Hyd# 93, Runnymede St @ Cooley Av	Stuck / leaky hydrant	Storm Drain	8/12/13	0900 to 0905	1000	200 GPM	0.2	9.4	0.65	Exercised valves and hydrant, used gravel and filter cloth, etc.	N/A	NO	0900	0900
810 Weeks St	Stuck / leaky hydrant	Storm Drain	10/23/13	1530 to 1540	4500	450 GPM	0.36	9.3	96.4	Exercised valves, gravel & filter cloth.	N/A	NO	1530	1530
2101 University Av	Hydrant knocked down by vehicle	Storm Drain	6/9/14	1230 to 1320	27000	600 GPM	N/A	N/A	N/A	Unable to take samples, etc. Location of Hydrant is in heavy traffic area, priority was to contain the water.	N/A	NO	1230	1230