



**Santa Clara Valley
Urban Runoff
Pollution Prevention Program**

MEMORANDUM

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San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Santa Clara Valley Water District

TO: Management Committee

FROM: Jill Bicknell and John Fusco, Program Staff

DATE: July 15, 2020

SUBJECT: Final FY 2019-2020 Annual Report Preparation Guidance

PURPOSE

The Program's FY 19-20 Annual Report is due to the Water Board by September 30, 2020. This memorandum provides background, instructions and guidance to assist Co-permittees in preparing the Annual Report, and the schedule for completion.

BACKGROUND

The Annual Report with attachments is submitted pursuant to Permit Provision C.17.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, No. CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report describes Co-permittee and Program activities accomplished during FY 2019-2020 implemented in compliance with the MRP.

Provision C.17.b requires the Permittee agencies to collaboratively develop a common annual reporting format for acceptance by the Water Board Executive Officer and use the approved Annual Report Form. Program staff worked with other stormwater programs through BASMAA Committees to develop and submit a proposed annual reporting format for the current MRP to the Water Board by the permit deadline of April 1, 2016. The Annual Report Form may be changed by April 1 of each year for the following Annual Report, to address MRP reporting requirements for that year and comments by Water Board staff, if any. Any changes to the Annual Report Form must be approved by Water Board staff. Program staff assisted BASMAA with this year's updates. BASMAA submitted the proposed changes to Water Board staff by April 1, 2020 and received a letter of acceptance from Water Board staff on May 4, 2020.

As in previous years, BASMAA provided guidance within the standard Annual Report Form. Program staff have modified the guidance, as appropriate, to be more specific to SCVURPPP Co-permittees. The guidance consists of statements highlighted in yellow that are embedded in the Annual Report Form. All guidance should be deleted before submitting the report to the Water Board.

Due to the COVID-19 pandemic and the County Health Department shelter-in-place orders which took effect in March of this fiscal year, Co-permittees and the Program have modified some programs and planned activities to comply with the State/County Health orders and still

continue to affect good faith compliance with the MRP 2.0. Per request of the Management Committee, Program staff have provided example language in the model Cover Letter to provide general documentation of the special circumstances, and have also provided additional guidance within this memorandum for relevant Annual Report Form sections on how to report on specific activities that may have been impacted.

INSTRUCTIONS FOR PREPARING CO-PERMITTEE ANNUAL REPORT

Co-permittee Annual Report Structure

The FY 19-20 Co-permittee Annual Report will consist of the following:

- A. Cover Letter
- B. Certification Statement
- C. Annual Report Form approved by the Water Board
 - Table of Contents
 - Annual Report Form: Sections 1-15
- D. Appendix
 - Table of Contents
 - Appendices

A description of each section is provided below.

A. Cover Letter

A model cover letter transmitting the Annual Report Form and certification statement (see attached) has been developed. You may use this letter as is or enhance it with additional information, as appropriate. The cover letter with wet signature should be scanned for inclusion in the electronic version of your annual report (or use electronic signature¹).

B. Certification Statement

A certification statement for the Co-permittee Annual Report (see attached) is required and should be included after the Cover Letter and before the Annual Report Form. This statement is the same as that used in previous Annual Reports. The certification statement with wet signature should be scanned for inclusion in the electronic version of your annual report (or use electronic signature¹).

C. Annual Report Form

Table of Contents

A Table of Contents was developed during the development of the Annual Report Form and is complete. It does not need to be updated.

Annual Report Form: Sections 1-15

A Word version of the Annual Report Form containing the embedded BASMAA-wide Annual Report Guidance (as enhanced for SCVURPPP) is provided to Co-permittees. It is requested that the Annual Report Form be completed in accordance with the suggested guidance and instructions. The form can be completed by adding text directly into the boxes. Guidance statements should be unhighlighted and/or deleted as appropriate.

Note that there are some new sections or guidance in the Annual Report Form that are required for FY 19-20. These include the following:

¹ This option is being confirmed with Water Board staff.

- C.5.c.iii Complaint and Spill Response Phone Number
 - Provide your agency's complaint and spill response phone number, and web address if used.
 - Attach a screen shot of the web page showing the central contact point.
 - Provide a discussion of how the central contact point (complaint and spill response phone number and, if used, web address) is being publicized to your staff and the public.
- C.7.a.iii Storm Drain Inlet Marking
 - State the number of municipally-maintained storm drain inlets in your jurisdiction.
 - Confirm that at least 80 percent of municipality-maintained storm drain inlets legibly are labeled with an appropriate stormwater pollution prevention message.
 - Attach a picture of a labeled municipality-maintained inlet.
 - Confirm that all privately-maintained streets have storm drain inlet markings verified prior to acceptance of the project.
 - Confirm that the storm drain inlet markings on privately-maintained streets were required to be maintained through the development maintenance entity.
- C.7.b.iii.2 Post-Campaign Effectiveness Assessment/Evaluation
 - Submit a report of the outreach campaign effectiveness assessment/evaluation completed (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.7.i. Outreach to Municipal Officials
 - Summarize outreach conducted to increase the overall awareness of stormwater and/or watershed messages among municipal officials during the permit term, and refer to the SCVURPPP Annual Report (using text provided in annual report template).
- C.11.c. Plan and Implement Green Infrastructure to Reduce Mercury Loads
 - Provide an estimate of land area treated by GSI by 2020, 2030, and 2040.
 - Provide a description of the RAA (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.11.d Prepare Implementation Plan and Schedule to Achieve TMDL Allocations
 - Submit mercury control measure implementation plan and supporting RAA (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.11.e Implement a Risk Reduction Program
 - Provide a brief description of the mercury risk reduction actions taken and effectiveness evaluation (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.12.c. Plan and Implement Green Infrastructure to Reduce PCBs Loads
 - Provide an estimate of land area treated by GSI by 2020, 2030, and 2040.
 - Provide a description of the RAA (refer to the SCVURPPP Annual Report, using text provided in annual report template).

- C.12.d Prepare Implementation Plan and Schedule to Achieve TMDL Allocations
 - Submit PCB control measure implementation plan and supporting RAA (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.12.f. Manage PCB-Containing Materials During Building Demolition
 - Documentation of Co-permittee compliance with minimum requirements, including number of applicable structures with demo permits, information on applicable structures with PCBs at 50 ppm or greater, and the assessment methodology and data collection program used to quantify PCB loads reduced (refer to the SCVURPPP Annual Report, using text provided in annual report template).
- C.12.h Implement a Risk Reduction Program
 - Provide a brief description of the PCB risk reduction actions taken and effectiveness evaluation (refer to the SCVURPPP Annual Report, using text provided in annual report template).

As requested in certain sections of the Annual Report Form, Co-permittees should develop attachments (e.g., tables, summaries, reports, plans, etc.) in accordance with the form instructions, as appropriate. If an attachment was developed, reference the attachment within the Annual Report Form and state that the attachment is included (e.g., See Appendix 4.2) within the Appendix. Additional guidance regarding the Appendix is provided below.

Please note that if additional comments are required to explain the data or information entered into a particular section, include them in a comment box just below the relevant data. DO NOT add footnotes because they may not be noticed by annual report reviewers.

D. Appendix

Table of Contents

Co-permittees should develop a Table of Contents for their Appendices. It is suggested that the Table of Contents should be prepared similar to the following example for Section 4 – Provision C.4 Industrial and Commercial Site Controls.

Appendix

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

Appendix 4-1: C.4.b.iii. Potential Facilities List

Appendices

If an appendix (i.e., attachment) was developed for a specific section, place the appendix in order within the appropriate Appendix section. It is requested that each appendix be clearly identified. For clarity and ease of finding each appendix, place a divider page between each Appendix section.

Co-permittee Annual Report Completion and Submittal

As in previous years, Program staff will be reviewing the Co-permittees' annual reports to help ensure consistency and completeness. In addition, Program staff will collect the electronic versions of Co-permittee annual reports and will upload the files to the Water Board's website per Water Board staff's instructions. A schedule for completion and submittal of Co-permittee annual reports is provided at the end of this memorandum.

ADDITIONAL GUIDANCE TO CO-PERMITTEES ON SPECIFIC ELEMENTS

C.10 Sections Provided by Program Staff

Certain sections of Section C.10 Trash Load Reduction will be developed by Program staff and submitted to individual Co-permittees for inclusion into their Annual Report Forms. These sections are highlighted in green within the Annual Report Form. Program staff will submit completed Section C.10 tables to Co-permittees in **early August 2020**. Co-permittees are expected to complete the remaining sections of Section C.10 not developed by Program staff (i.e., all other empty box and/or cells with Section C.10) prior to submittal to the Water Board.

Trash Hot Spot Activity Report

The annual reporting period for trash assessments and cleanups is July 1 to June 30. Co-permittees will report FY 19-20 results to the Water Board in their FY 19-20 Annual Reports. To ensure consistency in the reporting of data associated with trash hot spot assessments and cleanups conducted each year, Co-permittees are requested to complete and submit a *Trash Hot Spot Activity Report – 7/1/19 - 6/30/20* (Excel Spreadsheet). Reports for hot spots cleaned and assessed between July 1, 2019 and June 30, 2020 should be submitted electronically to John Fusco (jrfusco@eoainc.com) no later than **Friday, July 17, 2020**. Program staff has prepared a separate guidance document describing the submittal of trash hot spot assessment and cleanup data. It was distributed to the Management Committee on January 9, 2020 and is attached to this memorandum.

Based on the information provided to Program staff by Co-permittees in their *Trash Hot Spot Activity Reports – 7/1/19 - 6/30/20*, Program staff will calculate total trash loads removed via hot spot cleanups and populate the Annual Report table associated with Provision C.10.b.iii (Trash Hot Spot Assessment) for each Co-permittee. Program staff will submit completed Annual Report tables to Co-permittees in **early August 2020**. Co-permittees can use the completed table for their individual FY 19-20 Annual Reports.

Street Sweeping Data

As in past years, Co-permittees will collect and provide street sweeping data and information relating to other measures which improve sweeping efficiency; and evaluate the need to improve current street sweeping and storm drain system O&M programs. To demonstrate street sweeping efforts conducted by Co-permittees and pollutant loads removed each year, a summary is developed and included within the Program's Annual Report.

Please submit street sweeping data no later than **Friday, July 17, 2020**. Program staff has prepared a separate guidance document describing the submittal of street sweeping data (with specific procedures), similar to previous years. It was distributed to the Management Committee on January 9, 2020 and is attached to this memorandum.

Report of Newly Installed Stormwater Treatment Systems

In accordance with Permit Provision C.3.h.v.(2), Co-permittees are required to provide a list of newly installed (installed within the reporting period) stormwater treatment systems and HM controls to the local vector control agency and Water Board before the wet season (i.e., by October 1 of each year). Program staff will complete this submittal on the Co-permittees' behalf. The MRP used to require that information on newly installed systems be provided in the Annual Report, but this is now optional. To prepare the submittal, Program staff will compile data provided within Table C.3.h.v.(2) of each Co-permittee Annual Report. Co-permittees that choose not to report this information within the Annual Report should submit the information separately to Program staff by **September 18, 2020**. Program staff will consolidate all Permittee tables and submit them to the vector control agency and Water Board in a separate submittal.

REPORTING ON PERMIT ACTIVITIES IMPACTED BY COVID-19

Due to the COVID-19 pandemic and County Health Department orders, Co-permittees and the Program have modified some programs and planned activities to comply with the orders and still remain in compliance with permit requirements. The Program notified the Regional Water Board of MRP provisions that may be impacted by COVID-19 response on April 1, 2020. This section provides general direction on how modified activities under relevant provisions should be described and/or documented within Co-permittee Annual Reports.

Program staff updated the model Cover Letter to include language related to COVID modifications that is consistent with what was submitted to the Water Board. The letter states that the Co-permittee's Annual Report describes any modifications that were made to the extent, procedures, and/or timing of activities required in relevant sections of the MRP to achieve compliance under the current circumstances. These descriptions and documentation should be included in comment boxes within individual sections, in appropriate locations.

Direction on specific provisions is provided below.

C.2 – Municipal Operations

The April 1, 2020 submittal to the Water Board identified “potential impacts to training” as the only concern about this provision. There is no specified training requirement in C.2, other than the rural roads training (which is conducted by the Program), and no section of the Annual Report form for this provision that would require reporting of modified training activities.

C.3 – New Development and Redevelopment

Provision C.3.h allows O&M verification inspections to be conducted at a minimum of 15% of installed stormwater treatment systems in a given fiscal year. If this was achieved, no additional explanation is necessary. If the 15% was not achieved, or if follow up inspections and/or enforcement are still pending, you may want to provide additional information in the box under Provision C.3.h.v.(3)(d)-(e) for discussion of the effectiveness of your O&M inspection program and any proposed changes. Report that “O&M verification inspection procedures were modified to protect inspectors' health and safety during the COVID-19 pandemic. Inspections performed with the modified procedures are documented on the O&M verification inspection forms and in the data tracking system.” It may also be advisable to report that follow up and enforcement activities will be continued in FY 20-21.

Stormwater treatment system installation inspections are required but not specifically reported in the Annual Report. These inspections may also have been conducted with modified procedures for protection of inspectors' health and safety, and these modified procedures should be documented on inspection forms and in the inspection database, similar to O&M verification inspections.

If GSI implementation tasks such as CIP assessments were impacted, an explanation can be provided in the “Background Information” box for Provision C.3.j.ii.(2).

C.4 – Industrial and Commercial Site Controls

If applicable, in the Program Highlights summary box, report that “facility stormwater inspection procedures were modified to protect inspectors' health and safety during the COVID-19 pandemic. Inspections performed with the modified procedures are documented on the facility stormwater inspection forms and in the data tracking system.”

C.5 – Illicit Discharge Detection and Elimination

If applicable, in the Program Highlights summary box, report that your program “continued to address illicit discharges during the COVID-19 shelter-in-place.” Any specific information for how you addressed the illicit discharges reported during this time can be included in your electronic data tracking table or documented investigation information.

C.6 -- Construction Site Control

If applicable, in the Site/Inspection Totals comment box, report that “construction site stormwater inspection procedures were modified to protect inspectors’ health and safety during the COVID-19 pandemic.” If monthly wet season inspections were not conducted at all during March and/or April at the required construction sites, add a statement with the date for when your program was prepared to continue construction site inspections with the modified procedures. For example, “Our construction site inspectors have been trained in the new inspection procedures and were able to continue construction site stormwater inspections as of May 2020”.

C.7 – Public Information/Participation

All modified activities (virtual events and online school outreach activities) will be described in the Program’s Annual Report, and information provided to Co-permittees for completing the tables on public outreach, citizen involvement, and schools outreach events.

C.9 – Pesticide Toxicity Controls

If your agency was not able to conduct an IPM training for municipal employees that apply pesticides, report that no employees were trained in FY 19-20 (Provision C.9.b. Train Municipal Employees). Note that the MRP does not require an annual training; the requirement is to report how many of the employees that apply pesticides received training in the reporting year. In the comments box, you may state that your agency is exploring online training options for FY 20-21, if applicable.

C.10 – Trash Load Reduction

The April 1, 2020 submittal to the Water Board identified potential impacts to a number of trash load reduction implementation actions. As described below, Program staff will include recommended language in the draft C.10 sections developed by staff and provided to Co-permittees. Additional impacts will be addressed in the Program’s Annual Report. Specific guidance that will be provided under each applicable C.10 subprovision is as follows:

- **C.10.a.i ► Trash Load Reduction Summary** – In the draft C.10 sections provided to Co-permittees, Program staff will provide general language regarding the impacts of COVID-19 pandemic that Co-permittees should consider. For those that did not continue to achieve the 80% trash load reduction in FY 19-20, additional guidance will be provided. Proposed language/guidance will address: 1) any delays in the installation/construction of new trash full capture devices or the implementation of new trash controls, and 2) modifications to existing controls (e.g., street sweeping and business inspections) due to the pandemic.
- **C.10.b.i ► Trash Reduction – Full Capture Systems** - In the draft C.10 sections provided to Co-permittees, Program staff will provide general language regarding the impacts of COVID-19 pandemic that Co-permittees should consider including, as well as language to address any inability to complete inspection and maintenance of trash capture

systems, due to staff availability or access issues such as increased on-street parking. Additionally, specific guidance will be provided to Valley Water and the City of Palo Alto on modifications that occurred to the deployment and maintenance of trash booms as a result of the COVID-19 pandemic.

- C.10.b.ii ► Trash Reduction – Other Trash Management Actions (PART A) - In the draft C.10 sections provided to Co-permittees, Program staff will provide general language regarding the impacts of COVID-19 pandemic that Co-permittees should consider including, as well as language to address any inability to implement new trash management actions or modifications that were needed to existing actions, which may have compromised their effectiveness for ongoing trash reduction.
- C.10.b.ii ► Trash Reduction – Other Trash Management Actions (PART B) – Discussion of modifications to the Program’s Trash Monitoring and Assessment Strategy that occurred as a result of the COVID-19 pandemic will be included in the Program’s Annual Report. In the draft C.10 sections provided to Co-permittees, a footnote will be added to this section pointing readers to the Program’s Annual Report for details.
- C.10.b.iv ► Trash Reduction – Source Controls – Under the Santa Clara County Public Health Directive, single-use grocery bag bans were temporarily paused, which may have impacted stormwater trash reduction associated with these bans. Program staff are currently reviewing the data collected on the number of bags observed on streets/sidewalks during OVTAs conducted before and during the directive. Based on this analysis and discussion with the Trash AHTG, guidance will be provided by Program staff in the draft C.10 sections provided to Co-permittees to address whether the trash reduction credit claimed by Co-permittees in previous years should be modified in FY 19-20. Source control credits previously claimed for Expanded Polystyrene (EPS) foodware bans should not be affected in FY 19-20, so Program staff do not plan to include language regarding these source control actions.
- C.10.c ► Trash Hot Spot Cleanups – Some Co-permittees have indicated that they have been either unable to complete trash hot spot cleanups or cleanup schedules have been delayed. Program staff compile data on hot spots for all Co-permittees each year. Data submittals are due to Program staff by July 17th. Based on a review of the data submitted by Co-permittees, Program staff will provide specific guidance to each Co-permittee via their draft C.10 sections on modifications that needed to be made due to the COVID-19 pandemic.
- C.10.e. ► Trash Reduction Offsets – Some Co-permittees use trash reduction offsets for Additional Creek and Shoreline Cleanups to address trash load reduction requirements. Data associated with these cleanups are typically submitted to Program staff by Co-permittees. For those Co-permittees that were unable to maintain the 80% trash load reduction goal in FY 19-20 and have utilized offsets for cleanups in previous FYs, Program staff will include specific guidance in their draft C.10 sections on modifications that were needed due to the COVID-19 pandemic. The City of San Jose is currently the only Co-permittee that has an approved Direct Trash Discharge Control Program and Program staff will work directly with this Co-permittee on language to include in its Annual Report.

C.11/12 – Mercury and PCBs Controls

Any modifications to the implementation of C.11/C.12 activities that occurred as a result of the COVID-19 pandemic will be described in the Program’s Annual Report.

PROGRAM ANNUAL REPORT

Although countywide stormwater program annual reports are not required as part of Provision C.17.a, the Management Committee has determined that a Program Annual Report documenting Program-wide activities is useful and has directed Program staff to develop one each year. The Program FY 19-20 Annual Report Outline is attached. The Program FY 19-20 Annual Report will consist of 14 sections with appendices for certain sections. The appendices include Program work products and other relevant information relating to the completion of Program activities. Electronic copies of the Program's Annual Report will be submitted to the Water Board by September 30, 2020.

SCHEDULE FOR COMPLETION

The schedule for Co-permittee submittal of data to Program staff is as follows:

<u>Data Type</u>	<u>Submittal Date</u>
Trash Hot Spot Activity Reports	July 17
Street Sweeping	July 17
List of Newly Installed Stormwater Treatment Systems <i>(for Co-permittees that do not include this information in Table C.3.h.v.(2) of their Annual Report)</i>	September 18

The schedule for submittal, review, and completion of report sections is as follows:

<u>Activity</u>	<u>Completion</u>
Co-permittees receive draft report preparation guidance	April 10
Co-permittees receive final report preparation guidance	July 16 MC Mtg
Draft Section C.10 (Trash Load Reduction) sections distributed to Co-permittees	August 14
Draft Program report sections distributed to MC	August 28
Co-permittees submit draft sections for Program staff review*	August 28
MC provides comments on Program draft report	September 14
MC approval of draft Program report	September 17 MC Mtg
Co-permittees submit final reports (electronic only) to Program staff	September 18
Final Annual Report submitted to Water Board	September 30

* Program staff was requested by the Co-permittees to review their submittals for completeness prior to submittal to the Water Board. If submittals are incomplete, Program staff will request additional information from the Co-permittees which must be provided by September 18.

AGENCY LOGO/HEADER

September 30, 2020

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

Subject: **Insert Co-permittee Name**
FY 2019-2020 Annual Report

Dear Mr. Montgomery:

This letter and Annual Report with attachments is submitted by **Insert Co-permittee Name** pursuant to Permit Provision C.17.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2015-0049, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. **Insert Co-permittee Name** is a member of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) and reports on some permit provisions via the SCVURPPP Annual Report.

The Annual Report provides documentation of activities conducted during FY 2019-2020 and consists of the following:

- A. Certification Statement
- B. Annual Report Form
 - Table of Contents
 - Completed Annual Report Form: Sections 1-15
- C. Appendix
 - Table of Contents
 - Appendices

Due to the COVID-19 pandemic, the Statewide shelter-in-place Executive Order N-33-20 issued by Governor Newsom, and the Order of the Health Officer of Santa Clara County, SCVURPPP members notified Dr. Tom Mumley and Keith Lichten of your staff on April 1, 2020 that they anticipated not being able to address certain MRP 2.0 requirements or reporting provisions during the current public health crisis. The requirements and provisions in question (described in an attachment) were those that could not be implemented with appropriate social distancing so as to mitigate health risks to relevant municipal employees or contractors and, ultimately, their families and other members of the public, or which may not be achievable with reduced agency staffing availability due to illness, exposure, or reassignment to more urgent public health priorities, including duties as California disaster relief workers and staffing of Emergency Operations Centers and other pressing public health needs.

Insert Co-permittee Name continued to affect good faith compliance with MRP 2.0 otherwise and continued activities necessary to protect the public from a further imminent public health threat (should that condition be identified in association with their municipal stormwater discharges) and to protect water quality. This Annual Report describes any modifications that were made to the extent, procedures, and/or

Mr. Michael Montgomery
September 30, 2020
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timing of activities required in relevant sections of the MRP to achieve compliance under the current circumstances.

Please contact **{Insert Contact Name}** at XXX-XXX-XXXX regarding any questions or concerns.

Very truly yours,

--original signed by--

Duly Authorized Representative
Job Title

**[CO-PERMITTEE NAME]
FY 2019-2020 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 by Duly Authorized Representative:

[Name]
[Title]

Date



MEMORANDUM

Campbell • Cupertino • Los Altos • Los Altos Hills • Los Gatos • Milpitas • Monte Sereno • Mountain View • Palo Alto
San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Santa Clara Valley Water District

TO: Trash AHTG and Management Committee

FROM: John Fusco and Chris Sommers, Program Staff

DATE: January 9, 2020

SUBJECT: Annual Reporting of Trash Hot Spot Assessments and Cleanups; and Trash Hot Spot Cleanup Data Collection Form - FY 19-20

Purpose

The purpose of this memorandum is to provide guidance to Co-permittees for submitting trash hot spot assessment and cleanup data to Program staff and submitting data to the Water Board in FY 19-20; and to provide the Trash Hot Spot Cleanup Data Collection Form.

Background

In accordance with Permit Provision C.10.c of the Municipal Regional Permit (MRP 2.0), selected trash hot spots are required to be cleaned to a level of “no visual impact” at least one time per year for the term of the permit. Trash hot spots are defined as sections of creek or shoreline **significantly impacted** by trash of at least 100 yards of creek length or 200 yards of shoreline length. As part of the trash assessment and cleanup process, Co-permittees are required to quantify the volume of material removed from each hot spot cleanup; and attempt to identify sources to the extent readily feasible. Co-permittees are also required to document trash condition before and after the cleanup of the entire hot spot using photo documentation with a minimum of one photograph per **100 feet** of hot spot length.

To assist Co-permittees with collecting all required assessment and cleanup data, Program staff created the form entitled *Trash Hot Spot Cleanup Data Collection Form- FY19-20* (Data Collection Form). The Data Collection Form is included as an attachment to this memorandum. The annual reporting period for trash assessments and cleanups is July 1 to June 30. Co-permittees will report FY 19-20 results to the Water Board in their FY 19-20 Annual Reports due September 30, 2020.

Recommended Approach for Reporting Trash Hot Spots Assessment and Cleanup Data

To ensure consistency in the reporting of data associated with trash hot spot assessments and cleanups conducted each year by Co-permittees, the following guidance is provided.

1. Use Trash Hot Spot Cleanup Data Collection Form

Program staff requests that Co-permittees complete the attached *Trash Hot Spot Cleanup Data Collection Form- FY 19-20* (Data Collection Form) when conducting all trash hot spot assessment and cleanups. A definition sheet is included to describe terms found on the Data Collection Form. A separate Data Collection Form should be completed for each hot spot.

2. Complete Trash Hot Spot Activity Report – 7/1/19 - 6/30/20

Once a Co-permittee has completed a trash hot spot assessment and cleanup, information from the Data Collection Form should be entered into the *Trash Hot Spot Activity Report – 7/1/19-6/30/20* (Microsoft Excel Spreadsheet) provided by Program staff. To ensure consistencies between Co-permittees, drop down lists are provided for certain categories within the spreadsheet. In total, the following information should be transferred from the Data Collection Form to the spreadsheet:

- 1) Site ID – The unique identification number assigned to the site. Use site IDs reported in the Program's *Trash Hot Spot Selection Report* submitted to the Water Board on July 1, 2010.
- 2) Date – The date the trash assessment and cleanup was conducted.
- 3) Adjacent Land Uses – Adjacent land uses which are contributing to trash observed during the cleanup. Provide up to four adjacent land uses.
- 4) Bagged Trash: Size of Trash Bags (gallons) – The size of the trash bag (in gallons) used to collect trash.
- 5) Bagged Trash: Total # of Bags (full) – Number of bags of trash collected during the cleanup. Report the total number of full bags collected. If partially-full bags were collected, estimate how many full bags this trash represents if transferred to other trash bags.
- 6) Unbagged Trash: Estimated total volume – The estimated amount of construction debris and large items collected during the cleanup but not placed in trash bags. Report estimated amounts in cubic feet or cubic yards.
- 7) Presence of Single-use Carryout Plastic Bags – Indicate (Yes/No) if any single-use carryout plastic bags were present during hot spot assessment and cleanup.
- 8) Presence of Expanded Polystyrene (EPS) Food Service Ware – Indicate (Yes/No) if any EPS food service ware was present during hot spot assessment and cleanup.
- 9) Trash Pathway/Source – The suspected trash pathway/source in which the observed trash reached the water way. Provide up to four suspected pathways/sources.
- 10) Comments – Any comments or notes regarding the site assessment and cleanup, or other information regarding data reporting.

3. Submit Trash Hot Spot Activity Reports to Program Staff

To ensure consistency in data calculations of trash loads removed via hot spot cleanups, Co-permittees should submit trash hot spot assessment and cleanup data to Program staff via completed *Trash Hot Spot Activity Reports – 7/1/19 - 6/30/20* (Excel Spreadsheet). Reports for hot spots cleaned and assessed between July 1, 2019 and June 30, 2020 should be submitted electronically to John Fusco (jrfusco@eoainc.com) no later than **Friday, July 17, 2020**.

4. Program Staff Submit Completed Annual Report Forms to Co-permittees

Based on the information provide to Program Staff by Co-permittees in their *Trash Hot Spot Activity Reports – 7/1/19 - 6/30/20*, Program staff will calculate total trash loads removed via hot spot cleanups and populate the Annual Report table associated with Permit Provision C.10.c (Trash Hot Spot Selection and Cleanup) for each Co-permittee. Program staff will submit completed Annual Report tables to Co-permittees no later than **Friday, August 14, 2020**. Annual Report tables will include the volume removed for the most recent five years of hot spot cleanups. Co-permittees will use the completed table for their individual FY 19-20 Annual Reports.



Date: _____ Staff: _____

I. Site Information

Site ID# _____ Site Location: _____

Waterbody: _____ Jurisdiction(s): _____

Identify adjacent land uses to trash area (**Check all that apply**):
 Residential (Single-family) Residential (Multi-family)
 Commercial Urban Park Freeway Industrial Public Open Space Mixed-use Other Developed

II. Trash Removal

Bagged Trash (Un-compacted)

Size of trash bags (gallons): _____ Total # of bags (full): _____

Unbagged Trash (e.g., Construction Debris and Large Items)

Estimated Total Volume: _____ Unit (circle one): **ft³** **yd³**

III. Trash Information

Indicate the presence of persistent trash items.

Single-use Carryout Plastic Bags: Yes No

Expanded Polystyrene (EPS) Food Service Ware: Yes No

Describe potential trash pathways/sources (**Check all that apply**):

- | | | |
|---|---|--|
| <input type="checkbox"/> Trash accumulation | <input type="checkbox"/> Homeless encampments | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Litter | <input type="checkbox"/> Outfall _____ | <input type="checkbox"/> Unknown _____ |
| <input type="checkbox"/> Illegal dumping | <input type="checkbox"/> Other _____ | |

IV. Photo Documentation

Before Cleanup: Segment Photographs

Creeks: A B C

Shorelines: D E F

(Includes A-C)

Optional Photographs: Yes No

After Cleanup: Segments Photographs

Creeks: A B C

Shorelines: D E F

(Includes A-C)

Optional Photographs: Yes No

V. Comments

Comments: _____

Potential Data Points with Definitions

Data Points	Definitions
I. Site Information	
Site ID#	The unique identification number assigned to the site. The site ID# is used to track hot spot activities within databases or other tabular formats.
Site Location	The exact physical location of the upstream and/or downstream ends of the trash hot spot in relation to roads and/or physical landmarks (e.g., bridge crossings, outfalls) on the creek (e.g., Coyote Creek, outfall located 100 feet downstream of Julian Street Bridge). Alternatively, for larger hot spots, provide a length of creek between two different roads/bridge crossings or other physical landmarks (e.g., physical landmarks (e.g., Guadalupe River between W. Hedding Street and Coleman Avenue).
Waterbody	The waterbody (i.e., creek, river or other waterway) where the trash hot spot is located.
Jurisdictions	The jurisdiction(s) responsible for trash hot spot assessment and cleanup. Multiple jurisdictions may exist for certain water bodies (e.g., San Francisquito Creek).
Adjacent Land Uses to Trash Areas	Residential (Single-family), Residential (Multi-Family), Commercial, Urban Park, Freeway, Industrial, Public, Open Space, Mixed-use, Other Developed
II. Trash Removal	
<i>Bagged Trash (Un-Compacted)</i>	
Size of Trash Bag (gallons)	Size of trash bag (gallons) used to collect trash during the cleanup.
Total # of Bags (full)	Number of bags of trash collected during the cleanup. Report the total number of full bags collected. If partially-full bags were collected, estimate how many full bags this trash represents if transferred to other trash bags.
<i>Unbagged Trash (Construction Debris and Large Items)</i>	
Estimated Total Volume	The estimated amount of construction debris and large items collected during the cleanup but not placed in trash bags. Report estimated amounts in cubic feet or cubic yards.
III. Trash Information	
<i>Presence of Persistent Trash Items</i>	
Single-use Carryout Plastic Bags	Indicate if single-use carryout plastic bags were present during hot spot assessment and cleanup.
Expanded Polystyrene (EPS) Food Service Ware	Indicate if expanded polystyrene (EPS) food service ware was present during hot spot assessment and cleanup.
<i>Potential Trash Pathways/Sources</i>	
Trash Accumulation	Litter/trash observed to be accumulating in creeks below the high water line. Litter/trash is may be worn and aged in appearance; consist of light-weight, persistent and buoyant trash items (e.g., plastic bags, plastic bottles); and observed caught in surrounding vegetation, tree branches and rocks.
Litter	Improperly disposed/discarded wastes or other items observed in creek channels and/or creek banks. Commonly referred to as "trash". Litter/trash appears relatively "new" in appearance. Litter/trash is usually located in areas accessible to the public.
Illegal Dumping	Illegal dumping or discarding of larger quantities/sizes of litter/trash directly into a waterway or in close proximity to a creek. Garbage bags of trash or other unwanted items, appliances, furniture, tires, shopping carts and other large items are usually observed at illegal dump sites.
Homeless Encampments	Areas where homeless individuals live or congregate.
Outfall	The point where the storm drain system discharges (i.e., usually from a pipe) into a receiving water or channel.
Other	All other potential sources not described above.
Unknown	Trash source can not be determined or are known.
IV. Photo Documentation	
Creeks and Shorelines	Indicate the every 100 feet segment ID (i.e., A-F) where the photograph was taken to depict trash condition before or after trash cleanup. Segment IDs A-C correspond to both creek and shoreline hot spots, while segment IDs D-F only correspond to shoreline hot spots. A total of 6 photographs (3 before cleanup and 3 after cleanup) are required for creek hot spots and a total of 12 photographs (6 before cleanup and 6 after cleanup) are required for shoreline hot spots.
Optional Photographs	Indicate if optional photographs were taken to illustrate the volume of trash collected during the cleanup or other items of interest observed during cleanup.
V. Comments	
Comments	Comments or other notes regarding trash hot spot cleanup



MEMORANDUM

Campbell • Cupertino • Los Altos • Los Altos Hills • Los Gatos • Milpitas • Monte Sereno • Mountain View • Palo Alto
San Jose • Santa Clara • Saratoga • Sunnyvale • Santa Clara County • Santa Clara Valley Water District

TO: Management Committee

FROM: John Fusco, Program Staff

DATE: January 9, 2020

SUBJECT: Collection of Street Sweeping Data - FY 19-20

Background

Co-permittees collect and provide street sweeping data and information relating to other measures to Program staff in an effort to improve sweeping efficiency and evaluate the need to improve current street sweeping and storm drain system O & M programs. To demonstrate street sweeping efforts conducted within the SCVURPPP local agency jurisdictions and pollutant loads removed each year, a summary of activities conducted during the year is developed and included within the Program's Annual Report.

Collection of Street Sweeping Data

Street Sweeping

Consistent with previous years, we request that Co-permittees collect and fill out the attached Monthly Record Keeping Form for Street Sweeping and Leaf Removal Data for each month during the FY 19-20:

- Volume of material collected (cubic yards) and curb miles swept for residential, commercial and industrial areas. When reporting curb miles for each requested category, it is necessary to report areas operated in tandem or repeated.
- Volume of material collected (cubic yards) and curb miles swept for other areas swept (e.g., parking lots and major arterials).
- Volume of material collected (cubic yards) and curb miles swept (for residential, commercial, industrial and other areas) by sweeper type (e.g., regenerative air, broom and vacuum).
- Provide information relating to any changes in your street sweeping program (Changes in sweeping frequency, new equipment purchases, significant downtime, etc.).

Program staff will continue to review the forms from each Co-permittee and sum the total volume of material collected and curb miles swept (all land uses) for each Co-permittee. The removal rate (volume collected/curb miles swept), total volume of material removed¹ in tons and

¹ To determine the total volume of material removed in tons, it is necessary to convert cubic yards to tons. It is estimated that the average density of street sweeping material is 1,299 pounds per cubic yard (0.6495 tons per cubic yard) (Source: EOA, Inc., October 1996, Estimation of Copper Collected Through Street Sweeping Efforts. Prepared for San Mateo Countywide Stormwater Pollution Prevention Program).

estimated mean pollutant load reduction for copper, nickel, lead and zinc will also be calculated for each jurisdiction and reported in the Program's Annual Report.

Leaf Removal/Yard Waste Collection

Program staff requests that Co-permittees collect information relating to leaf removal and yard waste collection (i.e., yard trimmings); and report the information in the attached recordkeeping form for each month during FY 19-20. Co-permittees should only provide this information if they have leaf and/or yard waste collection programs (in addition to routine street sweeping) and have the ability to quantify the amount removed and/or collected. Information includes:

- Provide volume of leaves removed by municipality crews (in cubic yards).
- Provide the total number of leaves bagged by residents and picked up by the municipality.
- Provide volume of yard waste (i.e., yard trimmings) collected (in cubic yards).

Submittal information

Recordkeeping Forms

We request that Co-permittees collect and fill out the attached Monthly Record Keeping Form for Street Sweeping and Leaf Removal Data for each month during FY 19-20. Street sweeping data should be submitted electronically to me (jrfusco@eoainc.com). Please provide street sweeping data generated during FY 19-20 by **Friday, July 17, 2020**. It will be summarized and placed in the Program's *FY 19-20 Annual Report* submitted to the Water Board by September 30, 2020.

Thank you for your assistance. If you have any questions or concerns, please contact me. My direct information is listed below.

John Fusco, Program Staff
EOA/SCVURPPP
1410 Jackson Street
Oakland, CA 94612
(510) 832-2852 ext. 130
(510) 832-2856 (facsimile)
jrfusco@eoainc.com

Month and Year: _____

Agency: _____

Completed by: _____ Date: _____

STREET SWEEPING	Volume of material collected (cubic yards)	Miles swept* (curb miles)
1. Sweeping		
Residential Areas:		
Broom	_____	_____
Regenerative Air	_____	_____
Vacuum	_____	_____
Commercial Areas:		
Broom	_____	_____
Regenerative Air	_____	_____
Vacuum	_____	_____
Industrial Areas:		
Broom	_____	_____
Regenerative Air	_____	_____
Vacuum	_____	_____
Other Areas Swept: (e.g., parking lots, major arterials)		
Broom	_____	_____
Regenerative Air	_____	_____
Vacuum	_____	_____
TOTAL	_____	_____

2. Have there been any changes in your street sweeping program?
 (Efforts to have parked cars removed, changed sweeping frequency, new equipment, significant downtime, etc.)

LEAF REMOVAL

Volume of leaves removed by City/Town crews: _____ cubic yards

Leaves bagged by residents and picked up by your City/Town: _____ bags

Check box if you have a yard waste collection program: Volume of yard waste collected: _____ cubic yards

Check box if you do not have a leaf removal program other than routine street sweeping or yard waste collection:

* Report total miles covered by sweepers including areas operated in tandem or repeated.

Section	Name	Content
	Title Page	• Title Page
	Cover Letter	• Cover Letter
	Certification Statement	• Certification Statement
	Table of Contents	• Table of Contents
	Credits	• Credits
1	Introduction	<ul style="list-style-type: none"> • Background • Organization of Report • Appendices <ul style="list-style-type: none"> 1-1 Updated Confirmation Statements Designating a MC Representative and/or Alternate
2	Municipal Operations	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities
3	New Development and Redevelopment Performance Standard Implementation	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices <ul style="list-style-type: none"> 3-1 Stormwater Treatment Measure Installation and O&M Inspection Workshop Information
4	Industrial and Commercial Site Controls	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices <ul style="list-style-type: none"> 4-1 Industrial/Illicit Discharge Workshop Information
5	Illicit Discharge Detection and Elimination	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities
6	Construction Site Controls	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices <ul style="list-style-type: none"> 6-1 Construction Stormwater Inspection Workshop Information
7	Public Information and Outreach	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices <ul style="list-style-type: none"> 7-1 FY 19-20 Watershed Watch Campaign Work Plan 7-2 FY 19-20 Watershed Watch Campaign Annual Report 7-3 Program Contact Lists: Management Committee and Construction/Industrial/Illicit Discharge Contacts 7-4 2019 Going Native Garden Tour Summary Report 7-5 Watershed Watchers Program: FY 19-20 Fourth Quarter Report and Year-End Summary 7-6 FY 19-20 ZunZun School Assembly Program Report and Evaluation
8	Water Quality Monitoring	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities
9	Pesticides Toxicity Control	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices <ul style="list-style-type: none"> 9-1 FY 19-20 OWOW Store Partnership Reports 9-2 FY 19-20 Santa Clara Valley Green Gardener Program Reports

Draft Program FY 19-20 Annual Report Outline

Section	Name	Content
10	Trash Load Reduction	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices
11	Mercury and PCBs Controls	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendices
12	Copper Controls	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities • Appendix 12-1 Collection of Street Sweeping Data- Co-permittees
13	Exempted and Conditionally Exempted Discharges	<ul style="list-style-type: none"> • Introduction • Program Activities • Regional Activities