

TRANSMITTAL MEMORANDUM

February 21, 2005

Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Attention: Jan O'Hara

We are enclosing the 2005-2006 Work Plan for review. You can call me at
650-941-7222 if you have any questions regarding the Work Plan.

TOWN OF LOS ALTOS HILLS

A handwritten signature in black ink, appearing to read 'Richard Chen', is written over a horizontal line.

Richard Chen
Associate Engineer

February 21, 2005

**Santa Clara Valley Urban Runoff Pollution Prevention Program
FY 2005-2006 Work Plan**

Municipality: Los Altos Hills

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."



David Ross, P.E.
Acting City Engineer

**Santa Clara Valley Urban Runoff Pollution Prevention Program
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P.S. Id.	Activity	CI Item Source ¹	FY 05-06 Tasks	Status / Comments	Due Date (mo/yr)	Responsible Party
Illicit Connection & Illegal Dumping Elimination Activities						
ICID-2	Staff Training	URMP	Conduct annual training for urban runoff inspector and on-call staff.		On-going	Public Works
			Review and evaluate effectiveness		On-going	Public Works
Industrial/Commercial Discharger Control Programs						
	None in the Town of Los Altos Hills					
Public Streets, Roads, and Highways Operation and Maintenance						
PSRH-3	Staff Training	URMP	Conduct annual training for Public Works Maintenance staff.		On-going	Public Works
	Street Sweeping	URMP	Sweep streets with catchbasins once a month. Collect the types of street sweeping data and make it available to Program staff.		On-going	Public Works
			Review and evaluate effectiveness		On-going	Public Works
Rural Roads						
New	Rural Roads O&M Performance Standards	C.5	Implement the Performance Standards. Sweep streets according to the schedule mentioned in above section.		Annually	Public Works
			Review and evaluate effectiveness		On-going	Public Works
Storm Drain System Operation and Maintenance						
SD	Storm Drain Maintenance	URMP	All tasks are routine and on-going.		On-going	Public Works

¹ Place where continuous improvement item identified, either AR03-04 (Annual Report), URMP (co-permittee URMP work plan); WP03-04 (last year's co-permittee work plan) Review (co-permittee review meeting), or Program (task approved by the Management Committee for all co-permittees, if applicable, such as performance standard revisions).

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SD	Reporting of Observed ICID Evidence	URMP	Report to Program for the ICID data quarterly.		On-going	Public Works
	Storm Drain Maintenance	URMP	Evaluate and ensure that contractors use appropriate BMPs when conducting such activities as street painting, storm drain O&M, etc.		On-going	Public Works
			Review and evaluate effectiveness		On-going	Public Works
Water Utility Operation and Maintenance						
	Not operated by the Town of Los Altos Hills					
Corporation Yards Operation and Maintenance						
	Staff Training	URMP	Conduct annual training for Public Works Maintenance staff.		On-going	Public Works
			Review and evaluate effectiveness		On-going	Public Works
New Development and Construction Controls -- Planning Procedures (C.3)						
C.3.c Requirements for Group 1 and Group 2 Projects						
New		C.3.c.9	Update performance standards for Group 2 projects as needed.		Continuous Improvement	Public Works.
C.3.e Operation and Maintenance of Treatment BMPs						
New	Reporting	C.3.e.6	Report on the Co-permittee's treatment BMPs O&M verification program in each annual report, including organizational structure, evaluation of effectiveness, and planned improvement to the program. Include a list or summary of treatment BMPs inspected during the year, inspection results, and any required follow-up and correction.	We will not have any Group 1 project in the Town of Los Altos Hills.	ongoing	Public Works
			Review and evaluate effectiveness			Public Works

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C.3.f Hydrograph Modification Plan						
New	Reporting	C.3.f	Attend HMP training workshop conducted by the Program to train staff on HMP		FY05-06	Public Works
C.3.j Site Design Measures Guidance and Standards Development						
New		C.3.j.4	Incorporate any revised standards and guidance into local project approval process and “fully implement” the revised standards and guidance.		In progress, completed by 6/06	Public Works
C.3.n Reporting Requirements						
New	Collect and report the following for all projects that must implement treatment measures: BMPs, site design, and source control measures used, sizing criteria, O&M responsibility mechanism and responsible party	C.4.n.4	A system will be in place to collect the information in case such a project is proposed	Los Altos Hills does not expect to have any Group 1 new development or redevelopment projects	ongoing	Public Works
New	Reporting, staff training, review conditions of approval	C.3.n.5	Collect information and report a summary of types of pesticide reduction measures required for development projects, and the percentage of projects for which pesticide reduction measures were required.	Los Altos Hills to customize Program’s Model conditions of approval for pesticide-resistant landscaping features and practices. As applicable, the Town will modify conditions of approval. Distribute written guidance document provided by the Program and train staff.	In progress, completed by 6/06	Public Works
New Development -- Construction Inspection						
Const -6	Staff Training	URMP	Conduct annual training for Public Works staff.		ongoing	Public Works

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Const-5		Program (Revised PS)	Inspect all construction sites before and during rainy season per Performance Standard. Los Altos Hills will include a summary of the year's written inspection notices (for sites with inadequate erosion/sediment controls) and follow-up actions in the FY 05-06 AR.		ongoing	Public Works.
			Review and evaluate effectiveness			Public Works
Pest Management Program						
I. Municipal Pesticide Use						
Goal I.A. Eliminate all unnecessary municipal pesticide use (particularly organophosphate (OP) pesticide use) and implement Integrated Pest Management (IPM) techniques.						
		MM I.A.1	Document completion of tasks in annual reports. Use pesticide tracking process to document pesticide use.		Annually;	Public Works
Goal I.B. Raise awareness of all municipal employees and train employees who apply pesticides for the municipality about the municipality's IPM Policy and/or IPM techniques as appropriate.						
		I.B.3	Periodically (at least annually) inform employees who are not authorized and trained to apply pesticides that they cannot use over-the-counter pesticides in or around the workplace, consistent with the IPM Policy (PS #4c).		At least Annually	Public Works

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II. Public Education and Outreach						
Goal II.A. Increase awareness of IPM so target audiences recall less toxic pest management messages and adopt IPM behaviors. Target audiences include residential and commercial users, pesticide retailers, municipal employees, and special districts. (PS #6)						
		II.A.14	Conduct internal outreach on less toxic pest control to employees who do not necessarily purchase or apply pesticides during the course of their work (to encourage employees to use IPM techniques away from work).	Outreach to Los Altos Hills residents through article in Town's newsletter.	Annually	Public Works
III. Pest Control Operators (PCOs)						
Goal III.A. Minimize pesticide use by PCOs contracted for structural pest control and landscape maintenance.						
		III.A.4	Require PCOs contracted for municipal applications to use pest control methods consistent with the municipality's IPM policy (through contract specifications). Specifically, require contractors to: a) follow the agency's IPM policy, BMPs, and SOPs; b) provide evidence of current IPM training, when feasible; and c) provide documentation of pesticide use on agency property to the agency in a timely manner (PS#6).		Ongoing	Public Works
Goal III.B. Require all PCOs to implement Best Management Practices (BMPs).						
		III.B.2	Require PCOs contracted by municipalities to implement BMPs through contract specifications. (See Action III.A.4, above.) (PS #6)		Annually	Public Works
		MM III.B.1	Document efforts to complete the above actions.		Annually	Public Works
IV. Commercial Businesses						
	None in Los Altos Hills.		.			

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V. Household Hazardous Waste Collection						
Goal V.A. Provide pesticide disposal services through household hazardous waste (HHW) collection programs for all residents and small businesses, and encourage use of these programs.						
		V.A.5	Provide hazardous waste disposal information to residents, through distribution of materials (e.g., utility bill insert, city newsletter, community events, etc.) or advertising in local media		Periodically, at least annually	Public Works
VII. New Development						
Goal VII.A Minimize pesticide use at new and redevelopment sites.						
		VII.A.2	Consider pesticide reduction in the design, landscaping, and environmental reviews of proposed development projects. (C.9.d.ii.)	Refer to C.3.n.5. Use Program Model COA	Annually	Public Works
		MM VII.A.1.	Summarize types of pesticide reduction measures required (such as by conditions of approval) for new development and significant redevelopment projects, and the percentage of new development and significant redevelopment projects for which pesticide reduction measures were required. (C.3.n.)		Annually	Public Works
VIII. Monitoring and Science						
X. Review and Revision of Work Plan						
Goal X.A Implement a work plan that includes appropriate goals, actions and monitoring mechanisms to reduce pesticide related toxicity in urban runoff.						
		MM X.A.1.	Revise work plan to include any continuous improvement items. Report on completion of work plan tasks in Annual Report.		Annually; submit work plan updates in March; AR in September	Public Works
			Review and evaluate effectiveness			Public Works

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Mercury Pollution Prevention Program						
I. Municipal Use of Mercury Containing Products						
Goal I. Eliminate all unnecessary municipal use of mercury-containing products and establish proper disposal methods for products that cannot be eliminated.						
		I.D	Adopt a mercury policy or ordinance requiring the virtual elimination of mercury from controllable sources in urban runoff from agency operations.		FY 05-06	Public Works
		I.F	Continue implementing the Guidelines for Mercury-Containing Products Reduction and Management.		Annually	Public Works
		MM I	Document completion of tasks in annual reports. Use mercury-containing product reporting guidelines.		Annually	Public Works
V. Public Education and Outreach						
Goal V. Increase awareness of proper disposal of mercury-containing products and available non-mercury containing alternatives. Target audiences include residential, commercial, and industrial users and municipal employees.						
		V.B	Use existing mercury outreach materials, as needed, for outreach programs.	Materials available at Town Hall	ongoing	Public Works
		V.C	Attend community events and distribute outreach materials.		Annually	Public Works
		MM V.B	In the Annual Report, document and evaluate each outreach activity		Annually	Public Works
			Review and evaluate effectiveness			Public Works
Other Water Quality and Watershed Management Requirements						
New	Trash Investigation and Plan Development		Provide Program staff with documentation regarding trash complaints/incidents.	No "hot spots" was identified. Only little removal along roadside was required and managed by the Town crew.	ongoing	Public Works

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			Review and evaluate effectiveness			Public Works
Public Information / Participation						
	Public Outreach	URMP	Distribute environmental education materials to Los Altos Hills schools		Ongoing	Public Works
	Public Outreach	URMP	Publish articles targeted to residents in a local Newsletter		Ongoing	Public Works
	Public Outreach	URMP	Distribute information brochures and literatures for residents, developers and contractor		Ongoing	Public Works
	Public Participation	URMP	Work with City of Palo Altos and other cities for the activities of Watershed Education & Outreach Campaign		Ongoing	Public Works
			Review and evaluate effectiveness			Public Works

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Copper Action Plan Tasks						
CB-1	Vehicle Washing Operations	CAP	<ul style="list-style-type: none"> Distribute outreach materials on car washing at Town Hall counter and public events, and post on Town website. Submit data regarding car washing outreach activities and effectiveness evaluation in annual reports. 		Annually	Public Works
CB-8	Watershed assessment and protection	CAP	<ul style="list-style-type: none"> Revise City's General Plan, as needed, at next scheduled update, based on recommendations from the <i>Development Policies Comparison Project</i> and Provision C.3.l. 		At next update	Planning
			<ul style="list-style-type: none"> Review and implement guidance from SCVURPPP and San Jose on addressing water quality in the CEQA review process, as part of C.3.m. implementation. 		As Needed	Planning
CB-11	Street sweeping and storm drain O&M		<ul style="list-style-type: none"> Follow Program guidance regarding the collection and reporting of street sweeping data. Provide data for Annual Report. Evaluate need for improvement of current street sweeping program (within available budget) in FY 03-04 Annual Report. 		Annually	Public Works

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CB-12	Outreach on pool, spa maintenance	CAP	<ul style="list-style-type: none"> Distribute outreach materials at local public events; brochures at Town Hall counter; and placement on Town website. 		Annually	Public Works
CB-21	Use of architectural copper	CAP	<ul style="list-style-type: none"> Review and study ordinance from Palo Alto and consider feasibility of limiting the use of copper on roofs, in roof shingles, and for gutters. 	Considered feasibility in the Town that most drainages from the building go to the landscaped area and lands, it is not applicable to limit the use of copper on roofs, in roof shingles, and for gutters.		Planning
Nickel Action Plan Tasks						
NB-1	Measures to control nickel discharges from construction sites		<ul style="list-style-type: none"> Continue to implement Construction Inspection Performance Standards (see Construction Inspection work plan section). Continue to have inspectors attend Regional Board/Program workshops on construction site management and learn latest erosion/sediment control techniques Continue to attend Program workshops on post-development stormwater BMPs (C.3.) 		Annually	Public Works