

CITY OF CUPERTINO

Urban Runoff Management Program



Cat in Outfall, July 31, 2024

Annual Report FY 2024-2025



PUBLIC WORKS DEPARTMENT

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September 30, 2025

Ms. Eileen White
Executive Officer
San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subject: City of Cupertino FY 2024-2025 Annual Report

Dear Ms. White:

This letter and Annual Report with attachments is submitted by City of Cupertino pursuant to Permit Provision C.22.a of the Municipal Regional Stormwater NPDES Permit (MRP), Order R2-2022-0018, NPDES Permit No CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board. The Annual Report provides documentation of activities conducted during FY 2024-2025 and consists of the following:

- A. Certification Statement
- B. Annual Report Form
 - a. Table of Contents
 - b. Completed Annual Report Form Sections
- C. Appendix
 - a. Table of Contents
 - b. Appendices

Please contact Ursula Syrova at ursulas@cupertino.gov or 408-777-7603 regarding any questions or concerns.

Very truly yours,

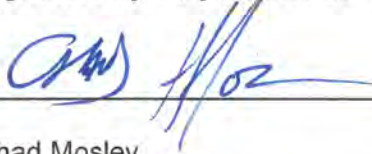
Ursula Syrova
Environmental Programs and Sustainability Manager

**CITY OF CUPERTINO
FY 2024-2025 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:



Chad Mosley
Public Works Director

9/29/2025

Date

FY 24-25 Annual Report
Permittee Name: City of Cupertino

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Section 1 – Permittee Information

SECTION I. BACKGROUND INFORMATION

Background Information					
Permittee Name:	City of Cupertino				
Population:	59,831 ¹				
NPDES Permit No.:	CAS612008				
Order Number:	R2-2022-0018				
Reporting Time Period (month/year):	July 2024 through June 2025				
Name of the Responsible Authority:	Chad Mosley			Title:	Director of Public Works
Mailing Address:	10300 Torre Avenue				
City:	Cupertino	Zip Code:	95014	County:	Santa Clara
Telephone Number:	408-777-7604		Fax Number:	408-777-3333	
E-mail Address:	ChadM@cupertino.gov				
Name of the Designated Stormwater Management Program Contact (if different from above):	Ursula Syrova		Title:	Environmental Programs and Sustainability Manager	
Department:	Public Works Department, Environmental Programs Division				
Mailing Address:	Cupertino City Hall, 10300 Torre Avenue				
City:	Cupertino	Zip Code:	95014	County:	Santa Clara
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E-mail Address:	UrsulaS@cupertino.gov				

¹Population derived from <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2025/>

Cupertino Acronyms/Abbreviations

AERC	A full service recycling company facility in Hayward which collects universal waste such as lamps, ballast, batteries, electronic scrap and mercury containing material. AERC Specialists provide regulatory compliance and consulting for handling U-waste.
CESSWI	Certified Erosion Sediment Storm Water Inspector
CIP	Capital Improvement Project
EC	Erosion Control
IND/IDDE Inspector	Illegal Discharge Detection and Elimination Inspector
MRP	Municipal Regional Permit
NPS Inspector	Non Point Source Inspector also called the IND/IDDE Inspector
PCA	Pest Control Advisor
Pub Ed	TAC Public Education Sub Group
PW	Public Works
QAC	Qualified Applicator Certificate. A category of the DPR licensing and certification Program. To be certified, the applicant must demonstrate specific knowledge on topics such as pesticide application drift problems and prevention, soil and water problems resulting from restricted use pesticides, phytotoxicity, potential for environmental contamination, etc.
R-O-W	Right of Way
SCC RWRC TAC	Santa Clara County Recycling & Waste Reduction Commission Technical Advisory Committee
WV	West Valley (communities)
ZLI	Zero Waste Initiative

SCVURPPP Acronyms/Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ABC	Annual Budget Review Compilation
ACCWP	Alameda Countywide Clean Water Program
ACOE	U.S. Army Corps of Engineers
AHTG	Ad Hoc Task Group
AR	Annual Report
ASCE	American Society of Civil Engineers
BAAQMD	Bay Area Air Quality Management District
BART	San Francisco Bay Area Rapid Transit
BATG	Budget Ad Hoc Task Group
Basin	Santa Clara Basin
Basin Plan	Water Quality Control Plan for the San Francisco Basin
BACWA	Bay Area Clean Water Agencies
BAHM	Bay Area Hydrology Model
BAMBI	Bay Area Macroinvertebrate Bioassessment Information
BASMAA	Bay Area Stormwater Management Agencies Association
Bay	San Francisco Bay
Bay Area	San Francisco Bay Area
BMI	Benthic Macroinvertebrate
BMM	Lower South Bay Monitoring and Modeling Subgroup
BMP	Best Management Practice
BOMA	Building Owners and Managers Association
BPP	Brake Pad Partnership
BU	beneficial use
C	Celsius
C.3	Permit Provision C.3
C3PO	C.3 Provision Oversight
CA	California
Cal-EPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CAMLnet	California Aquatic Macroinvertebrate Laboratory Network
Campaign	Watershed Watch Campaign

SCVURPPP Acronyms/Abbreviations

CAP	Copper Action Plan
CASQA	California Stormwater Quality Association
CB	Copper Baseline
CCC	Continuous Concentration Criterion
CD-ROM	Compact Disk-Read Only Memory
CDS	Continuous Deflective Separation
CEP	Clean Estuary Partnership
CEQA	California Environmental Quality Act
CESQG	Conditionally Exempt Small Quantity Generator
CESSWI	Certified Erosion Sediment and Storm Water Inspector
CEUs	Continuing Education Units
CFR	Code of Federal Regulations
cfs	cubic feet per second
CI	Continuous Improvement
CIWMB	California Integrated Waste Management Board
CMIA	Conceptual Model Impairment Assessment
CMS	Copper Management Strategy
COA	Condition of Approval
CoHHW	Santa Clara County Household Hazardous Waste Program
CoHHW Program	Santa Clara County Household Hazardous Waste Program
COLD	cold freshwater habitat
CRMP	Coordinated Resources Management and Planning
CSBP	California Stream Bioassessment Procedures
CTR	California Toxic Rule
Cu	Copper
CWA	Clean Water Act
DDD	Dichlorodiphenyldichloroethane
DDE	Dichlorodiphenyldichloroethylene
DDT	Dichlorodiphenyltrichloroethane
DEH	Santa Clara County Department of Environmental Health
District	Santa Clara Valley Water District
DO	Dissolved Oxygen
DOE	Department of Energy

SCVURPPP Acronyms/Abbreviations

DPR	Department of Pesticide Regulation
DWR	Department of Water Resources
E. Coli	Enterococcus Coli
EEC	SF Bay Wildlife Refuge Environmental Education Center
EEDMS	Environmental Enforcement Data Management System
EEPS	Exposure and Effects Pilot Study
e.g.	for example
EIR	Environmental Impact Report
EMAP	Environmental Monitoring Program
EMB	Executive Management Board
EOA	Eisenberg, Olivieri, and Associates
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
Estuary	San Francisco Bay Estuary
F	Fahrenheit
FTCD	Full Trash Capture Devices
FLT	Fluorescent Light Tube
FY	Fiscal Year
GCRCDD	Guadalupe-Coyote Resource Conservation District
GIASP	General Industrial Activities Stormwater Permit
GIS	Geographic Information System
GRTS	Generalized Random Tessellation Stratified
HBANC	Home Builders Association of Northern California
Hg	Mercury
HHW	Household Hazardous Waste, Santa Clara County
HMP	Hydromodification Management Plan
HVAC	Heating, Ventilation and Air Conditioning
IBI	Index of Biotic Integrity
IDDE	Illicit Discharge Detection and Elimination
IC/ID	Illicit Connection and Illegal Dumping
ID	Identification
IND	Industrial/Commercial
i.e.	that is

SCVURPPP Acronyms/Abbreviations

IPM	Integrated Pest Management
JPA	Joint Powers Authority
K	Kindergarten
KAB	Keep America Beautiful
kg	Kilogram
L	Liter
Lb	Pound
LA	load allocation
LFA	Limiting Factors Analysis
LID	Low Impact Development
LID Treatment	Rain water harvesting, Water re-use, Infiltration, Evapotranspiration, or Biotreatment
LSSB	Lower South San Francisco Bay
LUS	Land Use Subgroup
MC	Management Committee
MCMP	Metals Control Measures Plan
MCTT	Multi-Chambered Treatment Train
MDDB	Metadata Database
MDL	Most Downstream Location
MEP	Maximum Extent Practicable
Mercury Plan	Mercury Pollution Prevention Plan
Mg	milligram
mgd	million gallons per day
MIGR	Fish Migration
MOA	Memorandum of Agreement
MOFO	Morrison & Foerster
MOU	Memorandum of Understanding
MP	Monitoring Priority
MROSD	Mid-Peninsula Regional Open Space District
MRP	Municipal Regional Stormwater NPDES Permit – 10/14/2009
MS4	Municipal Separate Storm Sewer Systems
MYRWMP	Multi-Year Receiving Waters Monitoring Plan
NAP	Nickel Action Plan

SCVURPPP Acronyms/Abbreviations

NEMA	National Electrical Manufacturers Association
NAIOP	National Association of Industrial and Office Properties
NEPA	National Environmental Policy Act
ng	Nanogram
Ni	Nickel
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
OC	Organochlorine
O&M	Operation and Maintenance
OP	Organophosphate
OPP	U.S. EPA Office of Pesticide Programs
OW	U.S. EPA Office of Water
OWOW	Our Water Our World
P2	Pollution Prevention
PAHs	Polynuclear Aromatic Hydrocarbons
PBDE	Polybrominated Diphenyl Ether
Pb	Lead
PCBs	Polychlorinated Biphenyls
PCDD	Polychlorinated Dibenzo-p-Dioxins
PCDF	Polychlorinated Dibenzofurans
PCO	Pest Control Operator
pg	Picogram
PHAB	Physical Habitat Assessments
PIP	Public Information and Participation
PI/P	Public Information and Participation
PIPP	Public Information and Participation Program
PMPS	Pest Management Performance Standard
POC	Pollutant of Concern
POTW	Publicly Owned Treatment Works
PPDC	Pesticide Program Dialogue Program
PPPS	Planning Procedures Performance Standard
Program	Santa Clara Valley Urban Runoff Pollution Prevention Program
PS	Performance Standard

SCVURPPP Acronyms/Abbreviations

PSC	CASQA Pesticide Subcommittee
PVC	Polyvinyl Chloride
Q	Quarter
QAPP	Quality Assurance Project Plan
QSD	Qualified SWPPP Developer
QSP	Qualified SWPPP Practitioner
RA	Risk assessment
RAC	Regional Ad Campaign
RARE	Preservation of rare and endangered species
RCRA	Resource Conservation and Recovery Act
REC- 1	Water contact recreation
REC-2	Non-contact water recreation
Regional Board	San Francisco Bay Regional Water Quality Control Board
RFP	Request for Proposal
RMAS	Regional Monitoring and Assessment Strategy
RMP	Regional Monitoring Program
RPT	Report Preparation Team
RS	Regulatory Subgroup
RTA	Rapid Trash Assessment
RWQCB	San Francisco Bay Regional Water Quality Control Board
SC	Steering Committee
SCC	Santa Clara County
SCBWM1	Santa Clara Basin Watershed Management Initiative
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SCVWD	Santa Clara Valley Water District
SETAC	Society of Environmental Toxicology and Chemistry
SF	San Francisco
SFBRWQCB	San Francisco Bay Regional Water Quality Control Board
SFEI	San Francisco Estuary Institute
SFEP	San Francisco Estuary Project
SIC	Standard Industrial Classification
SMaRT®	Sunnyvale Materials Recovery and Transfer
SOP	Standard Operating Procedures

SCVURPPP Acronyms/Abbreviations

South Bay	Lower South San Francisco Bay
SPCWC	Stevens and Permanente Creeks Watershed Council
SPLWG	Sources, Pathways and Loadings Work Group (RMP)
SPWN	Fish Spawning
SSC	Suspended Sediment Concentration
SSI	Inventory of Santa Clara Basin Stream Studies
SSO	Water Quality Site-Specific Objective
State Board	State Water Resources Control Board
STOPPP	San Mateo Countywide Stormwater Pollution Prevention Program
SWAMP	Surface Waters Ambient Monitoring Program
SWANA	Solid Waste Association of North America
SWMP	Stormwater Management Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Technical Advisory Committee
TMDL	Total Maximum Daily Load
TO	Tentative Order
TP	Total Phosphorus
TPH	Total Petroleum Hydrocarbons
TRC	Technical Review Committee
ug	Microgram
UP3	Urban Pesticides Pollution Prevention Partnership
UPC	Urban Pesticide Committee
URMP	Urban Runoff Management Plan
URQM	Urban Runoff Quality Management
USA	Unified Stream Assessment
USEPA	U. S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VTa	Santa Clara Valley Transportation Authority
WAC	Watershed Assessment Consultant
WAMS	Watershed Assessment and Monitoring Subgroup
WAR	Watershed Assessment Report

SCVURPPP Acronyms/Abbreviations

WARM	Warm Freshwater Habitat
Water Board	San Francisco Bay Regional Water Quality Control Board
Water Boards	California State Water Resources Control Board together
Water District	Santa Clara Valley Water District
WEF	Water Environment Federation
WEO	Watershed Education and Outreach
WE&O	Watershed Education and Outreach
WERF	Water Environment Research Foundation
WG	Work Group
WILD	Wildlife Habitat
WLA	Waste Load Allocation
WMI	Watershed Management Initiative
Work Group “I”	SCBWMI Phase I Indicators Work Group
WP	Work Plan
WRPC	Water Resources Protection Collaborative
WVC	West Valley Communities
WVCWP	West Valley Clean Water Program
WW	Watershed Watch
WWTP	Wastewater Treatment Plant
WY	Water Year
YSI	Youth Science Institute
Zn	Zinc

Section 2 – Provision C.2 Reporting Municipal Operations

Program Highlights

Highlight/summarize activities for reporting year:

Summary:

In September of FY 24-25, City staff conducted the annual inspection of the Municipal Service Center (MSC).

The City's Environmental Program Specialist and the City's Stormwater Inspector attended the March 6, 2025, Rural Road Workshop. Topics covered included an overview of the Handbook for Forest, Ranch and Rural Roads (PWA) for the Mendocino County Resource Conservation District, a panel discussion of Rural Road Inspection Programs, and a review of MRP Rural Road BMPs and Temporary BMPs for Erosion and Sediment Control.

The City continues to participate in the Program's Municipal Operations AHTG. Please refer to the C.2 Municipal Operations section of SCVURPPP's FY 24-25 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.

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

Comments:

In FY 24-25 the City continued its robust program of roadway paving, sidewalk repair, and right-of-way accessibility improvements and accomplished the following:

- 36,829.21 SF of sidewalk sections replaced
- 17,834.58 SF of driveway sections replaced

- 47 ADA curb ramps installed
- 2.6 miles of street paving repairs

Implementation and maintenance of stormwater BMPs are required through the contracts established with contractors performing work on behalf of the City. These types of public projects are managed by a Public Works Project Manager, City Maintenance Supervisor, and/or Public Works Inspector who are knowledgeable of BMP implementation and management. In addition, the City's IND/IDDE Inspector also conducts periodic spot inspections of these work areas to ensure BMPs are being maintained during the project. These projects are typically conducted between June and early October to avoid working during the rainy season. BMPs are installed by the contractors prior to street paving/sealing and are removed at the completion of the project. Similarly, curb and gutter improvements are overseen by the Public Works Inspector who checks the work areas for any deficiencies of BMPs or conditions that could or are contributing to water pollution, either actual or threatened.

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

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

Y	Prevention of polluted wash water and non-stormwater from pavement, sidewalk and plaza cleaning, mobile cleaning, outdoor pressure washing operations, and washing down of trash areas and gas station or mobile fueling service areas from discharging to storm drains
Y	Inclusion of sanitizing procedures in BMPs for washing down outside areas of human habitation
Y	Implementation of BMPs such as those included in the BASMAA Mobile Surface Cleaner Program or the CASQA good housekeeping videos
Y	Coordination with sanitary sewer agencies to determine if disposal to the sanitary sewer is available for the wastewater generated from these activities, provided that appropriate approvals and pretreatment standards are met

Comments:

The City does not use surface cleaning power washing as a regular method of cleaning, with exception of one building exterior (Senior Center and attached wood deck) and the swimming pool deck at Blackberry Farm Picnic area. At both locations, storm drains in the vicinity of the surface cleaning area are covered and all wash water is directed to adjacent landscaping for ground percolation. Material spills are contained, cleaning is done with dry methods whenever possible, and staff are trained that wash-down is a last resort and any effluent must be contained and discharged to landscaping or the sanitary sewer.

The MSC has dry method spill kits clearly labeled in various locations around the facility, including the vehicle/equipment fueling island canopy and the roadway legends and paint areas. These are periodically checked and re-supplied as needed. They are also checked during the annual MSC inspection

The City finalized formal BMPs for washing down outside areas of human habitation which include sanitizing procedures. The BMP sheet will be included in the performance standard for contractors retained to provide such services. No sanitization of outside areas of human habitation occurred in FY 24-25.

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.

Y	Control of discharges from bridge and structural maintenance activities directly into surface waters or storm drains
N/A	Control of non-stormwater and wash water discharges from graffiti removal activities
Y	Proper disposal for wastes generated from bridge and structure maintenance and graffiti removal activities
N/A	Employee training on proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities
Y	Contract specifications requiring proper capture and disposal methods for wastes generated from bridge and structural maintenance and graffiti removal activities

Comments:

Graffiti removal throughout the City is generally very minor and localized. The City does not experience significant graffiti on either public or private property and there has not been need for large scale graffiti removal operations. When there is graffiti removal, it is generally done by the City's maintenance staff who use small amounts of covering paint or graffiti remover to clean roadway signs and poles, and the activity generates little waste or stormwater pollutants to manage. Larger graffiti removal projects would likely involve a contractor performing the work and City staff would ensure that proper installation of BMPs was observed for the duration of the project and include the SCVURPPP Graffiti BMP Fact Sheet with the contract package.

Five CIP bridge maintenance projects were completed in FY 24-25. All projects adhered to their Wash Water and Debris Containment Plans and were regularly inspected by the Public Works inspector.

C.2.e. ► Rural Public Works Construction and Maintenance	
Does your municipality own/maintain rural ¹ roads?	☒ Y Yes ☐ No
If your answer is No , then skip to C.2.f .	
Place a Y in the boxes next to activities where applicable BMPs were implemented. If not applicable, type NA in the box and provide an explanation in the comments section below. Place an N in the boxes next to activities where applicable BMPs were not implemented for one or more of these activities during the reporting fiscal year, then in the comments section below provide an explanation of when BMPs were not implemented and the corrective actions taken.	
☒ Y	Control of road-related erosion and sediment transport from road design, construction, maintenance, and repairs in rural areas
☒ Y	Identification and prioritization of rural road maintenance based on soil erosion potential, slope steepness, and stream habitat resources
☒ Y	Constructing roads and culverts that do not impact creek functions, including migratory fish passage
☒ Y	Inspection of rural roads for structural integrity and prevention of impact on water quality
☒ Y	Maintenance of rural roads adjacent to streams and riparian habitat to reduce erosion, replace damaging shotgun culverts, and address excessive erosion
☐ N/A	Re-grading of unpaved rural roads to slope outward where consistent with road engineering safety standards, and installation of water bars as appropriate
☐ N/A	Inclusion of measures to reduce erosion, provide fish passage, and maintain natural stream geomorphology when replacing culverts or designing new culverts or bridge crossings
Comments (including listing increased maintenance in priority areas): The City does not have any unpaved rural roads. The combined length of paved rural roads in Cupertino is less than five miles and includes Regnart Road, Lindy Lane, and Stevens Canyon Road to the southern City limit. In a typical year, inspection and maintenance of this limited amount of rural roadway is part of the City's on-going planned and prioritized street maintenance. Minor maintenance generally consists of vegetation control and management done by hand with City staff employing BMPs as deemed necessary for the conditions. In FY 24-25 the City completed the re-construction of approximately 300 linear feet of Regnart Road adjacent to Regnart Creek. The scope of work included roadway widening, pavement replacement, retaining wall reconstruction, and guardrail installation. The retaining wall reconstruction was done on the creek side of the roadway and on the opposite, uphill side the improvements provided both roadway stabilization and erosion control.	

¹Rural means any watershed or portion thereof that is developed with large lot home-sites, such as one acre or larger, or with primarily agricultural, grazing or open space uses.

C.2.f. ► Corporation Yard BMP Implementation	
Place an X in the boxes below that apply to your corporation yard(s):	
☐	We do not have a corporation yard.
☐	Our corporation yard is a filed NOI facility and regulated by the California State Industrial Stormwater NPDES General Permit.
☒	We have a Stormwater Pollution Prevention Plan (SWPPP) for the Corporation Yard(s).
Place an X in the boxes below next to implemented SWPPP BMPs to indicate that these BMPs were implemented in applicable instances. If not applicable, type NA in the box. If one or more of the BMPs were not adequately implemented during the reporting fiscal year then indicate so and explain in the comments section below:	
☒	Control of pollutant discharges in stormwater such as wash water
☒	Routine inspection of corporation yard(s) in August or September to ensure non-stormwater discharges have not entered the storm drain system and pollutant discharges are prevented to the maximum extent practicable
☒	Containment of all vehicle and equipment wash areas through plumbing to sanitary sewer or other collection method
☒	Use of dry cleanup methods when cleaning debris and spills from corporation yard(s) or collection and disposal of all wash water to sanitary sewer or other location where it does not impact surface or groundwater if wet cleanup methods are used
☒	Require private companies/contractors to use dry cleanup methods when cleaning debris and spills from corporation yard(s) or collect and dispose of all wash water to sanitary sewer or other location where it does not impact surface or groundwater if wet cleanup methods are used
☒	Cover and/or berm outdoor storage areas containing pollutants
Comments:	

If you have a corporation yard(s) that is not an NOI facility, for inspection results for your corporation yard(s), complete the following table, provide a narrative above, or attach a summary including the following information:

MSC Vehicle and Equipment Closed-loop Wash Rack

The MSC uses a closed loop, self-contained wash rack and pad which does not discharge to the storm or sanitary sewer systems. The wash rack and pad are used to clean mowers, vehicles, and other equipment requiring rinsing and cleaning of pollutants such as sediment, vegetative material, and residual vehicle/equipment fuel and lubricants. These pollutants are captured as sludge and disposed of in landfill when solidified and the wash water is recycled. The wash system receives monthly inspection and as-needed cleaning. The MSC staff conduct regular inspections to ensure continued efficiency and proper capture of solids and effluent. The nearest drain inlet to the wash rack and pad, DI#2, is protected with a Full Trash Capture device including a hydrocarbon filter which is cleaned or replaced as needed, minimum three times per year. A permanent rubber berm is installed at the low area of the wash rack and pad to keep run-off from leaving the wash rack area.

MSC Pre-Rainy Season Inspection

The City's contracted street sweeper provides a monthly sweep of the MSC work vehicle/equipment parking lot, open and paved work areas, and paved drive aisles. The MSC undergoes a thorough annual inspection each September pursuant to the MRP. In FY 23-24, the City Environmental Programs Supervisor conducted the inspection. All storm drain inlets, service activity areas, vehicle and equipment parking, and storage areas are inspected to identify deficiencies, potential improvements, and to ensure that the facility is prepared for the upcoming rainy season. Nine of the 17 drain inlets at the facility are fitted with REM Full Trash Capture (FTC) devices including hydrocarbon filters which are inspected, cleaned and/or replaced three times per year by the vendor through a maintenance agreement.

Corporation Yard Name	Corp Yard Activities w/ site-specific SWPPP BMPs	Inspection Date²	Inspection Findings/Results	Date and Description of Follow-up and/or Corrective Actions
Municipal Service Center (MSC)	The Municipal Service Center activities include vehicle and equipment maintenance and repair, vehicle and equipment parking and storage, vehicle and equipment fueling, vehicle and equipment washing, hazardous waste generation and short-term accumulation prior to off-site disposal, construction and maintenance materials storage, and emergency mobile diesel generator storage.	9-5-24	All exterior areas of the MSC including the front employee/customer parking area were inspected. The inspector identified three issues. One was debris found on the ground around the hazardous waste shop. The second was the metals bin was not covered.	Re-inspections conducted on 9-12-24 and 9-19-24. Inspection findings were addressed and no further issues were noted.

² Minimum inspection frequency is once a year between August 1 and September 30.

C.2.h. ► Staff Training				
Dates of Training	Training Topics Covered	Total number of Permittee maintenance staff	Permittee maintenance staff who attended training	
			Number	Percent
3-6-2025	Rural Roads Workshop. Overview of the handbook for forest, ranch, and rural roads (PWA) for the Mendocino County Resource Conservation District. Panel discussion of rural road inspections programs. Review of MRP rural road BMPs and temporary BMPs for erosion and sediment control.	54	1	2%
Comments:				

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

C.3.b.iv.(2) ► Regulated Projects Reporting

Fill in attached table **C.3.b.iv.(2)** or attach your own table including the same information.

Please refer to Table C.3.b.iv.(2) for the required information.

C.3.d.iv. ► Tree Runoff Reduction and Tree-Based Stormwater Treatment Systems.

(For FY 24-25 Annual Report only) Permittees may collectively submit a proposal which evaluates the benefit and associated criteria of runoff reduction associated with trees with respect to treatment control sizing.

See the C.3 section of the SCVURPPP FY 24-25 Annual Report. Following discussions with Regional Water Board staff, Permittees opted not to submit a proposal that evaluates the benefit and associated criteria for runoff reduction related to trees in the context of treatment control sizing. However, the stormwater benefits of trees are being considered by the Long-Term Green Infrastructure Technical Working Group (TWG) and recommendations, including evaluation of the benefits of trees, are included in the TWG report (see Provision C.3.j.v.(7) Long-Term Green Infrastructure Technical Working Group below).

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

Is your agency choosing to require 100% LID treatment onsite for all Regulated Projects and not allow alternative compliance under Provision C.3.e.?

	Yes	X	No
--	-----	---	----

Comments (optional): N/A

C.3.e.v ► Special Projects Reporting

1. In FY 24-25, 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)?

X	Yes		No
	Yes	X	No

2. In FY 24-25, has your agency granted final discretionary approval to a Special Project? If yes, include the project in both the **C.3.b.iv.(2)** Table, and the **C.3.e.v.** Table.

If you answered “Yes” to either question,

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

C.3.h.v.(2). ► List of Newly Installed¹ Stormwater Treatment Systems and HM Controls

On an annual basis, before the wet season, provide a list of newly installed (installed within the reporting period) stormwater treatment systems and HM controls (for both regulated and non-regulated projects) to the local mosquito and vector control agency and include a copy of that information in the Annual Report. The list shall include the facility locations and a description of the stormwater treatment measures and HM controls installed.

(Optional) Also complete Table C.3.h.v.(2) ► Reporting Newly Installed Stormwater Treatment Systems and HM Controls

1. Did your agency provide the list of newly installed Stormwater Treatment Systems and HM Controls to the Vector Control agency, either individually or through the Countywide Program? (If no, provide an explanation.)	X	Yes		No
2. Is a copy of the communication, including the list of newly installed treatment/HM measures, included in your Annual Report?		Yes, See Appendix 3-1	X	No, see SCVURPPP Annual Report for a copy of the communication and list.

C.3.h.v.(3)(a) – (c) ► Installed Stormwater Treatment Systems Operation and Maintenance Verification Inspection Program Reporting

Site Inspections Data	Number/Percentage
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the previous fiscal year (FY 23-24)	38
Total number of Regulated Projects (including offsite projects, and Regional Projects) in your agency's database or tabular format at the end of the reporting period (FY 24-25)	42

¹“Newly Installed” includes those facilities for which the final installation inspection was performed during this reporting year.

Total number of Regulated Projects (including offsite projects, and Regional Projects) for which O&M verification inspections were conducted during the reporting period (FY 24-25). Include only stormwater related inspections.	23
Percentage of the total number of Regulated Projects (including offsite projects, and Regional Projects) inspected during the reporting period (FY 24-25). Include only stormwater related inspections.	%60 ²
Comments: N/A	

**C.3.h.v.(3)(d)-(e) ► Installed Stormwater Treatment Systems
Operation and Maintenance Verification Inspection Program
Reporting**

Provide a discussion of the inspection findings for the year and any common problems encountered with various types of treatment systems and/or HM controls. This discussion should include a general comparison to the inspection findings from the previous year.

Summary:

The City's Public Works Engineering Inspector inspects and verifies the Operation & Maintenance (O&M) for the various types of treatment systems for Cupertino's private property regulated projects. The City of Cupertino does not use a third-party for C.3 inspections; however, a few private projects utilize such a third-party to inspect the O&M of those systems and provide reporting to the City. In those instances, the Public Works Engineering Inspector also conducts inspections of the systems to verify the findings of the third-party inspectors. The City's Public Works Engineering Inspector performed inspections of 23 regulated project sites which include the treatment structures at each site. Enforcement in FY 24-25 consisted of five verbal warnings, four of which were for trash and debris found in the bioretention basin, and one for sediment issues.

Provide a discussion of the effectiveness of the O&M Program and any proposed changes to improve the O&M Program (e.g., changes in prioritization plan or frequency of O&M inspections, other changes to improve effectiveness of the program).

Summary:

The post-construction stormwater BMP O&M inspection program inspections for FY 24-25 did not present significant challenges. The combination of increased awareness, education provided by City staff, and meetings at regulated project sites continues to strengthen the program. Property owners have accepted the responsibility of maintaining stormwater treatments and HM controls.

² Based on the number of Regulated Projects in the database or tabular format at the end of the previous fiscal year, per MRP Provision C.3.h.ii.(6)(b).

The City's Regulated Project O&M inspection program is coordinated through a recorded stormwater BMP O&M agreement between the property owner and the City and is reinforced by requirements in the City's Municipal Code, which provides the City the legal authority to remediate any deficiencies and recover the costs from the private property owner when warranted. Operational procedures that contribute to the program's success include:

Selection of Annual O&M Inspection Sites:

- All newly installed treatment measures, HM controls, and pervious pavement systems that total at least 3,000 sf are inspected by the Public Works Engineering Inspector upon installation.
- All treatments and controls on at least 20% of the City's C.3 regulated sites are inspected annually, as allowed under C.3.h.ii. (6). In FY24-25, 23 regulated project sites were inspected.

Inspection Program Responsibilities:

- Public Works engineers review development plans for MRP C.3 compliance.
- The Public Works Engineering Inspector (a certified CESSWI) observes the construction of regulated project treatment measures during his routine construction site inspections (C.6) and performs O&M inspections and enforcement for all the City's C.3 regulated projects. The inspection details and outcomes are tracked in his Excel regulated project reporting database.
- The Public Works Engineering Inspector field-checks construction of the on-site C.3 treatments and signs off on the grading permits. Prior to City approval for site occupancy and documents when the project was completed.
- The Public Works Inspector submits a Permanent Treatment O&M Inspection summary table for the previous fiscal year to the Environmental Programs Specialist and Environmental Compliance Technician by August 15th of each year.
- The Environmental Programs Specialist and Environmental Compliance Technician review the inspection summary table and report the required O&M inspection data in the City's Annual Report.

Pre-Inspection Preparation:

- The Public Works Engineering Inspector reviews the C.3 regulated project reporting table and the O&M Inspection records prior to beginning annual inspections.
- Prior to an initial site inspection, the Public Works Engineering Inspector may review the site's Storm Water Management Plan, including applicable as-built construction plans, for permanent treatment information, as well as treatment types and locations. This will cease to be necessary as he becomes very familiar with the existing treatment measures throughout the City.
- The Public Works Engineering Inspector will review previous City inspection results and the property owner's O&M maintenance records.
- The Public Works Engineering Inspector is familiar with SCVURPPP fact sheets on specific treatment measures and uses them as guidance when addressing questions raised during the inspection by the site owners or operators.

Enforcement Procedures:

- If any deficiency is identified, the Public Works Inspector will document it. If the Inspector issues a written notice of violation, it will include the O&M inspection results, a list of corrective actions needed, and a compliance schedule. This notice is given to the property owner/site manager and compliance will be expected and verified within ten business days of the inspection or before the next anticipated rain, whichever occurs first.

- In the event of a deficiency, the inspector will complete a follow-up inspection, documenting whether all recommended maintenance activities have been completed and if other actions are needed to ensure proper operation of the facility.

If repairs are not undertaken or are not done properly within the time allotted in the compliance schedule, the City will begin enforcement proceedings as provided in City's C.3 O&M Verification Enforcement Response Plan (ERP) and documented in the Municipal Code. The inspector documents the date that all necessary repairs have been completed in the City's C.3 O&M Excel database, including other pertinent information regarding maintenance of the site.

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

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

Summary:

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

- BASMAA's site design fact sheets
- C.3.i guidance provided by the SCVURPPP C.3 Stormwater Handbook

C.3.j.iii. ► No Missed Opportunities

On an annual basis, submit a list of green infrastructure projects, public and private, that are planned for implementation during the permit term and infrastructure projects planned for implementation during the permit term that have potential for green infrastructure measures. Include the following information:

- A summary of planning or implementation status for each public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. (see C.3.j.iii.(2) Table B - Planned Green Infrastructure Projects).
- A summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. For any public infrastructure project where implementation of green infrastructure measures is not practicable, submit a brief description of the project and the reasons green infrastructure measures were impracticable to implement (see C.3.j.iii.(2) Table A - Public Projects Reviewed for Green Infrastructure).

Summary of Planning or Implementation Status of Identified Projects:

Please refer to Tables C.3.j.iii.(2)-A and C.3.j.iii.(2)-B for the required information.

C.3.j.iv.(2) ► Participate in Processes to Promote Green Infrastructure

On an annual basis, report on the goals and outcomes during the reporting year of work undertaken to participate in processes to promote green infrastructure.

Please refer to the SCVURPPP FY 24-25 Annual Report for a summary of efforts conducted to help regional, State, and federal agencies plan, design and fund incorporation of green infrastructure measures into local infrastructure projects, including transportation projects.

C.3.j.v.(1)(a) ► Non-Regulated (Green Infrastructure) Projects Reporting

Fill in attached table **C.3.j.v.(1)(a)** with information on non-regulated GI projects that have completed construction during the reporting period, or attach your own table including the same information.

Please refer to table C.3.j.v.(1)(a) for the required information.

C.3.j.v.(1)(d) ► Tracking and Mapping Tools

Provide a summary report on the implementation of tracking and mapping tools and provide a link to the component which is available to the public.

Summary Report:

Please refer to the SCVURPPP FY 24-25 Annual Report for a summary of implementation of the tracking and reporting tools, and a link to the component which is available to the public.

C.3.j.v.(3) ► Numeric Retrofit Requirements

In each Annual Report, report on progress made towards the retrofit requirements described in Provision C.3.j.ii.(2).

The City of Cupertino has completed two numeric retrofit projects since Jan 1, 2021. The Memorial Park retrofit project was completed in October of 2022 as accounted for 71,300 square feet (1.64 acres). The Alan Row public retrofit project was completed in November of 2025 and accounted for 14,700 square feet (0.33 acres). The City of Cupertino will continue to review all public projects to determine the feasibility of additional non-regulated public green infrastructure projects.

C.3.j.v.(7) ► Long-Term Green Infrastructure Technical Working Group (TWG)

(For FY 24-25 Annual Report only) Collectively submit a report summarizing Long-Term GI TWG efforts and recommendations.

See the C.3 section of the SCVURPPP FY 24-25 Annual Report for a report summarizing TWG efforts and recommendations.

C.3.j.v.(6) ► One-time Offset of Numeric Implementation Retrofit Requirements

In FY 2022-23, did your jurisdiction submit a report to offset numeric implementation retrofit requirements by a one-time credit of up to 25 percent? (If no, move to the next table.)	☐	Yes	☒	No
Retrofit impervious area treated due to implementation of the ordinance in FY 24-25 (acres):	N/A			
Cumulative area of retrofit impervious area treated due to implementation of the ordinance up to the end of FY 24-25 (acres):	N/A			

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 1) – Projects
Approved During the Fiscal Year Reporting Period
Reporting Period – July 1, 2024- June 30, 2025

Project Name Project No.	Project Location ³ , Street Address	Name of Developer	Project Phase No. ⁴	Project Type & Description ⁵	Project Watershed ⁶	Total Site Area (Acres)	Total Area of Land Disturbed (Acres)	Total New Impervious Surface Area (ft ²) ⁷	Total Replaced Impervious Surface Area (ft ²) ⁸	Total Pre- Project Impervious Surface Area ⁹ (ft ²)	Total Post- Project Impervious Surface Area ¹⁰ (ft ²)
Private Projects											
Sunnyview Retirement Community	22445 Cupertino Road	Front Porch Communities and Services	N/A	Exterior renovations, including the replacement of parking lots and walkways	Permanente Creek	9.63	0.94	164	26,050	52,607	52,771
Public Projects											
None											
Comments:											

³ Include cross streets

⁴ If a project is being constructed in phases, indicate the phase number and use a separate row entry for each phase. If not, enter "NA".

⁵ Project Type is the type of development (i.e., new and/or redevelopment). Example descriptions of development are: 5-story office building, residential with 160 single-family homes with five 4-story buildings to contain 200 condominiums, 100 unit 2-story shopping mall, mixed use retail and residential development (apartments), industrial warehouse.

⁶ State the watershed(s) in which the Regulated Project is located. Downstream watershed(s) may be included, but this is optional.

⁷ All impervious surfaces added to any area of the site that was previously existing pervious surface.

⁸ All impervious surfaces added to any area of the site that was previously existing impervious surface.

⁹ For redevelopment projects, state the pre-project impervious surface area.

¹⁰ For redevelopment projects, state the post-project impervious surface area.

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 2) – Projects
Approved During the Fiscal Year Reporting Period (private projects)
Reporting Period – July 1, 2024- June 30, 2025

Project Name Project No.	Project Status ¹¹	Estimated or Actual Completion Date ¹²	Source Control Measures ¹³	Site Design Measures ¹⁴	Treatment Systems Approved ¹⁵	Type of Operation & Maintenance Responsibility Mechanism ¹⁶	Hydraulic Sizing Criteria ¹⁷	Alternative Compliance Measures ^{18/19}	Alternative Certification ²⁰	HM Controls 21/22
Private Projects										
Sunnyview Retirement Community	Entitlement Approval: 7/25/2024	TBD	Beneficial landscaping, Maintenance (pavement sweeping, catch basin cleaning, good housekeeping), Storm drain labeling, Full trash capture devices for inlets & trench drains	Minimize land disturbed, Cluster structures/ pavement	Bioretention area	O&M agreement with private owner	3	N/A	Third Party review and certification by Schaaf and Wheeler	Exempt Less than 1 AC impervious area create and/or replaced

¹¹ Provide status of project (e.g., application date, application deemed complete date, project approval date).

¹² Provide an estimate of the construction completion date (e.g., specific month and year, or year). If not known, write “TBD” or not available.

¹³ List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

¹⁴ List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

¹⁵ List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

¹⁶ List the legal mechanism(s) (e.g., O&M agreement with private landowner; O&M agreement with homeowners’ association; O&M by public entity, etc…) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

¹⁷ See Provision C.3.d.i. “Numeric Sizing Criteria for Stormwater Treatment Systems” for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

¹⁸ For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.iv.(2)(m)(i) for the offsite project.

¹⁹ For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.iv.(2)(m)(ii) for the Regional Project.

²⁰ Note whether a third party was used to certify the project design complies with Provision C.3.d.

²¹ If HM control is not required, state why not.

²² If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.b.iv.(2) ► Regulated Projects Reporting Table (part 2) – Projects Approved During the Fiscal Year Reporting Period (public projects)										
Reporting Period – July 1, 2024- June 30, 2025										
Project Name Project No.	Approval Date ²³	Date Construction Scheduled to Begin or Date of Completion	Source Control Measures ²⁴	Site Design Measures ²⁵	Treatment Systems Approved ²⁶	Operation & Maintenance Responsibility Mechanism ²⁷	Hydraulic Sizing Criteria ²⁸	Alternative Compliance Measures ^{29/30}	Alternative Certification ³¹	HM Controls ^{32/33}
Public Projects										
None										
Comments:										

²³ For public projects, enter the date on which the project was authorized to move forward, such as approval of a CIP, budget, or other action.

²⁴ List source control measures approved for the project. Examples include: properly designed trash storage areas; storm drain stenciling or signage; efficient landscape irrigation systems; etc.

²⁵ List site design measures approved for the project. Examples include: minimize impervious surfaces; conserve natural areas, including existing trees or other vegetation, and soils; construct sidewalks, walkways, and/or patios with permeable surfaces, etc.

²⁶ List all approved stormwater treatment system(s) to be installed onsite or at a joint stormwater treatment facility (e.g., flow through planter, bioretention facility, infiltration basin, etc.).

²⁷ List the legal mechanism(s) (e.g., maintenance plan for O&M by public entity, etc.) that have been or will be used to assign responsibility for the maintenance of the post-construction stormwater treatment systems.

²⁸ See Provision C.3.d.i. "Numeric Sizing Criteria for Stormwater Treatment Systems" for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

²⁹ For Alternative Compliance at an offsite location in accordance with Provision C.3.e.i.(1), on a separate page, give a discussion of the alternative compliance site including the information specified in Provision C.3.b.iv.(2)(m)(i) for the offsite project.

³⁰ For Alternative Compliance by paying in-lieu fees in accordance with Provision C.3.e.i.(2), on a separate page, provide the information specified in Provision C.3.b.iv.(2)(m)(ii) for the Regional Project.

³¹ Note whether a third party was used to certify the project design complies with Provision C.3.d.

³² If HM control is not required, state why not.

³³ If HM control is required, state control method used (e.g., method to design and size device(s) or method(s) used to meet the HM Standard, and description of device(s) or method(s) used, such as detention basin(s), bioretention unit(s), regional detention basin, or in-stream control).

C.3.h.v.(2). ►Table of Newly Installed³⁴ Stormwater Treatment Systems and Hydromodification Management (HM) Controls (Optional)

Reporting Period – July 1, 2024- June 30, 2025

Fill in table below or attach your own table including the same information.

See the SCVURPPP FY 24-25 Annual Report for a copy of the communication to Vector Control.

Name of Facility	Address of Facility	Party Responsible³⁵ For Maintenance	Type of Treatment/HM Control(s)
Public or Private Regulated Projects			
Alan Row (formerly Bateh Brothers)	22516-22540 Stevens Creek Blvd, 10147 & 10149 S Foothill Blvd (formerly 22690 Stevens Creek Blvd)	Alan Enterprise LLC	Bioretention
Westport – Parcel A	Multiple Addresses on Point Reyes Terrace & Dana Point Ln (formerly 21255 Stevens Creek Blvd)	Taylor Morrison of California LLC	Bioretention & Silva Cells
Westport – Parcel C	21301 Point Reyes Terrace	Cupertino Pacific Associates LP	Bioretention
76 Gas Station	10490 S De Anza Blvd	Liaoning Benefit Petroleum Corporation	Bioretention
Public or Private Non-regulated GI Projects			
Alan Row Offsite Improvements	22690 Stevens Creek Blvd.	Alan Enterprise LLC	Bioretention

³⁴ "Newly Installed" includes those facilities for which the final installation inspection was performed during this reporting year.

³⁵ State the responsible operator for installed stormwater treatment systems and HM controls.

C.3.e.v. Special Projects Reporting Table														
Reporting Period – July 1, 2024- June 30, 2025														
Project Name & No.	Permittee	Address	Application Submittal Date ³⁶	Status ³⁷	Description ³⁸	Site Total Acreage	Total Impervious Surface Created / Replaced ³⁹ (ft²)	Gross Density DU/Acre	Density FAR	Special Project Category ⁴⁰	Category C Projects: # of DUs in each AMI Category and # of Manager's DUs	LID Treatment Reduction Credit Available ⁴¹	List of LID Stormwater Treatment Systems ⁴²	List of Non-LID Stormwater Treatment Systems ⁴³
Wolfe Road Educator Workforce Housing (ASA-2025-009)	City of Cupertino	10333 N Wolfe Rd	6/26/2025	Pending Approval – 1 st Submittal of Project Plans dated 5/16/25	Residential – 7 buildings + parking garage, 250 units (94 units reserved for educators, 156 affordable housing units)	5.16 AC	172,311 sf	50.01 DU/AC	1.55	Category A: N/A Category B: N/A Category C: Affordable Housing Location: N/A Density: Res >= 40 DU/AC Parking: N/A	Total DUs: 250 Moderate: 147 Low: 50 Very Low: 50 Extremely Low: 0 Acutely Low: 0 Manager's Dus: 3	Category A: N/A Category B: N/A Category C: 80% Location: N/A Density: 5% Parking: N/A	Flow-Through Planters (28.5%), Self-Treating Areas (10.0%), Self-Retaining Areas (22.7%)	Media Filter System (38.8%)

³⁶ Date that a planning application for the Special Project was submitted. If a planning application has not been submitted, include a projected application submittal date.

³⁷ Indicate whether final discretionary approval is still pending or has been granted, and provide the date or version of the project plans upon which reporting is based.

³⁸ Type of project (commercial, mixed-use, residential), number of floors, number of units, type of parking, and other relevant information.

³⁹ The total impervious surface in acres created or replaced by the project, which is subject to the treatment requirements listed in Provision C.3.e.ii.(1).

⁴⁰ For each applicable Special Project Category, list the specific criteria applied to determine applicability. For each non-applicable Special Project Category, indicate n/a.

⁴¹ For each applicable Special Project Category, state the maximum total LID Treatment Reduction Credit available. For Category C Special Projects also list the individual Location, Density, and Minimized Surface Parking Credits available.

⁴² List all LID stormwater treatment systems proposed. For each type, indicate the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area.

⁴³ List all non-LID stormwater treatment systems proposed. For each type of non-LID treatment system, indicate: (1) the percentage of the total amount of runoff identified in Provision C.3.d. for the Special Project's drainage area, and (2) whether the treatment system either meets minimum design criteria published by a government agency or received certification issued by a government agency, and reference the applicable criteria or certification.

Special Projects Narrative

Special Projects Narrative provided by the Applicant is below. Please note the Special Project is still under entitlement review and the information noted may change.

10333 WOLFE ROAD **Narrative Discussion of Low Impact Development Feasibility/Infeasibility**

This report provides a narrative discussion of the feasibility or infeasibility of providing 100 percent low impact development (LID) treatment for 10333 Wolfe Road, which has been identified as a potential Special Project, based on Special Project criteria provided in Provision C.3.e.ii of the Municipal Regional Stormwater Permit (MRP). This report is prepared in accordance with the requirement in MRP Provision C.3.e.vi.(2), to include in Special Projects reporting a narrative discussion of the feasibility or infeasibility of 100 percent LID treatment onsite or offsite.

1. Feasibility/Infeasibility of Onsite LID Treatment

The project site was reviewed with regard to the feasibility and infeasibility of onsite LID treatment. The results of this review showed that it was infeasible to treat 100 percent of the C.3.d amount of runoff with LID treatment. The findings of this review are presented below.

- a. **On-site Drainage Conditions.** The site drainage pattern is designed to mimic pre-redevelopment areas and directions. Most of the site drains east and north discharging into an existing culvert. The grades are overall fairly mild, generally 2% or less. The project was divided into drainage management areas that will drain to separate stormwater treatment measures. These areas are shown on the sheets titled “Stormwater Management Plan” of the submitted plan set.
- b. **Self-treating and Self-Retaining Areas and LID Treatment Measures.** The project is utilizing landscape areas as self-retaining areas. The project is also utilizing pervious pavement.
- c. **Maximizing Flow to LID Features and Facilities.** Drainage routing has been optimized to route as much drainage as possible to LID features and facilities, such as self-retaining landscape areas and flowthrough planter areas.
- d. **Constraints to Providing On-site LID.** The drainage management area proposed to drain to a vault-based high flow rate media filter includes the building areas and surface pavement. In this area, conditions and technical constraints are present that preclude the use of LID features and facilities, as described below.
 - i. Impervious paved areas: These include building roof areas and surface pavement areas. The areas

proposed to utilize these types of treatment are outlined on the sheets titled “Stormwater Management Plan” of the submitted plan set.

ii. Landscaped areas:

- Inadequate size to accommodate biotreatment facilities that meet sizing requirements for the tributary area.
- Lack of head or routing path to move collected runoff to the landscaped area or from the landscaped area to a disposal point;

2. Feasibility/Infeasibility of Off-Site LID Treatment.

The possibility of providing off-site LID treatment was found to be infeasible for the following reasons.

- i. The project proponent does not own or otherwise controls land within the same watershed of the project that can accommodate in perpetuity off-site bioretention facilities adequately sized to treat the runoff volume of the primary project.
- ii. There is no regional LID stormwater mitigation program available to the project for in-lieu C.3 compliance.

C.3.j.iii.(2) ► Table A - Public Projects Reviewed for Green Infrastructure

Project Name and Location ⁴⁴	Project Description	Status ⁴⁵	GI Included? ⁴⁶	Description of GI Measures Considered and/or Proposed or Why GI is Impracticable to Implement ⁴⁷
Memorial Park- Specific Plan Design	Following the findings of the Master Plan process, develop a conceptual design for Phase 1 features and amenities. Features to be considered include walking path improvements, playable water feature, enhancing tree canopy, integrating natural features, and enhancing indoor and outdoor event and gathering spaces.	Completed conceptual design. Next steps TBD.	TBD	Will be evaluated for GSI potential during advanced design phase.
Library Vegetated Swale Reconstruction (formerly Library Expansion Project)	Redesign the library parking lot vegetated swales.	Project is pending design. Grant funding awarded.	TBD	Previously constructed vegetated swales (2004) will be evaluated to determine feasibility for conversion of the swales to bioretention to treat impervious parking lot.
Tamien Innu (Junipero serra Trail)	Three phase construction of an impervious multi-use trail adjacent to the Junipero Serra Channel (owned by Valley Water).	This is a multi-year proposed three-phase project that is currently in design phase.	No	The project was evaluated for GSI, however due to the minimum trail width requirements, GSI was infeasible. In addition, the trail will be a pervious constructed surface. The current surface of where the trail is being planned is also pervious dirt, so no substantial water quality benefit would be achieved.

⁴⁴ List each public project that is going through your agency's process for identifying projects with green infrastructure potential.

⁴⁵ Indicate status of project, such as: beginning design, under design (or X% design), projected completion date, completed final design date, etc.

⁴⁶ Enter "Yes" if project will include GI measures, "No" if GI measures are impracticable to implement, or "TBD" if this has not yet been determined.

⁴⁷ Provide a summary of how each public infrastructure project with green infrastructure potential will include green infrastructure measures to the maximum extent practicable during the permit term. If review of the project indicates that implementation of green infrastructure measures is not practicable, provide the reasons why green infrastructure measures are impracticable to implement.

**C.3.j.iii.(2) ► Table B - Planned Green Infrastructure Projects
During the Permit Term**

Project Name and Location ⁴⁸	Project Description	Planning or Implementation Status	Green Infrastructure Measures Included
Lawrence-Mitty Park	Development of a neighborhood park and trail expansion over several acres of land. This will be a multi-year project from design to build.	Conceptual Plan approved in FY 23-24. Advanced design to continue in FY 24-25.	Due to the proposed size of the park, this may be a regulated project, depending on the amount of impervious surface that would be redeveloped. If not a regulated project, GSI features will be evaluated and could be incorporated to the design element.

⁴⁸ List each planned (and expected to be funded) public and private green infrastructure project that is not also a Regulated Project as defined in Provision C.3.b.ii. Note that funding for green infrastructure components may be anticipated but is not guaranteed to be available or sufficient.

C.3.j.v.(1)(a)► Non-Regulated (Green Infrastructure) Projects Reporting Table – Projects Constructed During the Fiscal Year Reporting Period

Reporting Period – July 1, 2024- June 30, 2025

Project Location, Street Address	Name of Owner	Project Description	Construction Completion Date	Treatment Measures	Party Responsible for O&M	Hydraulic Sizing Criteria ⁴⁹	Total Area Draining to Treatment Measures (ft ²)	Impervious Area Treated (ft ²)	Pervious Area Treated (ft ²)
Alan Row Offsite Improvements (formerly 22690 Stevens Creek Blvd)	City of Cupertino	Installation of new bioretention facilities within the park strips along the Stevens Creek Blvd & Foothill Blvd frontages	11/7/2025	Bioretention	Alan Enterprise LLC	2B & 3	15,897 sf	12,092 sf	3,805 sf
Comments: This project represents the non-regulated additional public treatment area of the regulated private project listed in C.3.h.v(2).									

⁴⁹ See Provision C.3.d.i. “Numeric Sizing Criteria for Stormwater Treatment Systems” for list of hydraulic sizing design criteria. Enter the corresponding provision number of the appropriate criterion (i.e., 1.a., 1.b., 2.a., 2.b., 2.c., or 3).

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

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Summary:

Inspection Overview

Consistent with the IND Program Business Inspection Plan, in FY 24-25 the City prioritized and conducted IND facility inspections at businesses identified as having the likelihood of contributing to pollution of stormwater runoff or that had recently documented violations encountered through the IDDE program. The facilities in the IND inspection program included: automotive facilities, building supplies/services, grocery stores, corporation yards, restaurants, pesticide facilities, shopping centers, office buildings, major retail, dry cleaners, and agriculture. In FY 24-25, the City inspected 78 different business facilities, a decrease in the number inspected in the previous FY (160). There was a decrease in the number of businesses inspected because MRP 3.0 had a new requirement in C.10 to inspect Private Land Drainage Areas (PLDAs), which took a significant amount of staff time to complete the 151 PLDAs that were identified.

The Business Inspection Plan was reviewed to ensure it meets the MRP requirements and provides a consistent and workable framework to administer the IND program. No changes were identified.

Fines and Fees

The City has a re-inspection fee program that is intended to incentivize property oversight and adherence to stormwater pollution BMPs. It provides for monetary penalties to be assessed for sites that are inspected and found to have violations. In FY 24-25, the re-inspection fee was \$434 per inspection. Typically, the fee is assessed for each inspection which is required to determine compliance and complete mitigation of any potential or actual discharge identified during the initial inspection. In FY 24-25, six businesses were found to be in violation, but 0 reinspection fees were issued because all but one violations were resolved while the inspector was there doing the original inspection. The one property that was issued a re-inspection fee was handled under the IDDE program.

Several months before the IND inspections begin, re-inspection fee letters are mailed to all property and business owners scheduled for an IND inspection. Starting in FY 23-24, we created an online fillable version of the IND re-inspection fee letter to make it easier for businesses and property owners to respond. A QR code was also included in the letter so they can easily access the online version. The City did the same for FY 24-25 but also included “OR Current Occupant” to the letters hoping it would reduce the number of letters that get returned from the Post Office. An explanation of the IND program and educational brochure are provided to encourage active oversight and engagement of the businesses concerning stormwater pollution prevention. Also included is a brochure explaining the County’s Very Small Quantity Generator (VSQG) program which provides a low-cost resource for disposal to small business owners that may generate modest amounts of hazardous waste (e.g. fluorescent tubes, cleaners, etc.). The goal is to reduce the storage of these unused/broken materials in trash enclosures and other exterior areas which present a threatened discharge condition.

The City requests the IND program letters be signed and returned, acknowledging receipt by both the business and the property owner. Of the 69 letters mailed in FY 24-25, a total of 12 signed letters were returned: 1 signed letter was received via email, eight letters were received via the online QR code, and three letters were received via mail. A property owner’s failure to return the signed letter does not absolve them from any

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responsibilities under the MRP, municipal code, or the assessment of re-inspection fees or fines. The number of letters mailed out differs from the 78 total facility inspections because some letters only went to property owners as the facility occupant was the same.

In addition to the re-inspection fee, businesses and property owners may also be issued an administrative citation for up to \$500 per violation (\$100 for the first violation, \$200 for the second violation, and \$500 for the third and any subsequent violations within 12 months). In FY 24-25, two administrative citations were issued to Allario Shopping Center, located at 10265 S. De Anza Blvd., for violations discovered during IND inspections, but were billed under C.5 IDDE.

All inspections scheduled for FY 24-25 were completed. Typically, inspectors meet with staff from the business being inspected to discuss the IND program, review best practices, and to educate for deficiencies identified during the inspections. For businesses that were found to be closed during the inspection, a perimeter and outside area inspection was conducted. Inspectors did not enter areas behind gates/fences or where otherwise prohibited by law.

The City continues to be an active participant in the SCVURPPP IND/IDDE ad hoc task group. Refer to the C.4. Industrial and Commercial Site Controls section of the Program's FY 24-25 Annual Report for a description of activities of the Program and/or the BASMAA Municipal Operations Committee.

C.4.d.iii.(1)(a) & (c) ► Facility Inspections

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

X	Permittee reports multiple, discrete, potential and actual discharges at a site as one enforcement action.
	Permittee reports the total number of discrete potential and actual discharges at each site.
	Number
Total number of inspections conducted (C.4.d.iii.(1)(a))	78
Total number of enforcement actions, or discrete number of potential and actual discharges resolved within 10 working days or otherwise deemed resolved in a longer but still timely manner (C.4.d.iii.(1)(c))	10
Comments: This FY, the City determined that six separate facilities were found to have one or more violations. Of the six facilities, there were a total of five verbal warnings issued, two notices of violation (NOV), one pre-citation notice, and two administrative citations. Of the six facilities found with violations, one facility exceeded ten business days, but was deemed resolved in a longer but still timely manner due to administration of the ERP: 1. Allario Shopping Center - 10265 S. De Anza Boulevard: During the routine IND inspection at one of the businesses in this shopping center (Special Noodle Soup), multiple violations were found in the common area. Waste bin lids not closed, cooking oil bins unsanitary, no second containment, grease stains. On 10/9/24, a certified NOV was mailed. Re-inspection on 10/16/24 showed the violations had not been corrected and a second NOV was sent via certified mail. Second re-inspection was done on 11/1/24 and the violations were still not corrected, so a pre-citation was emailed. A third re-inspection was done on 11/13/24 and the violations remained, so an administrative citation for \$300 was sent via certified mail and email. On 12/10/24, a fourth re-inspection was done and the violations were still not	

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C.4 – Industrial and Commercial Site Controls

corrected, so a second administrative citation (for \$600) was sent via certified mail and email. The site wasn't re-inspected again until 2/10/25 because the previous inspector retired, by which time the violations had been corrected. Billed \$900 administrative citation fees and five reinspection fees at \$434 each, totaling \$3,070. This was addressed through the IDDE program.

C.4.d.iii.(1)(b) ► Number of Each Type of Enforcement Conducted

	Enforcement Action (As listed in ERP) ¹	Number of Enforcement Actions Taken
Level 1	Verbal Warning	5
Level 2	Notice of Violation (NOV)	2
Level 3	Administrative Pre-Citation Notice	1
Level 4	Administrative Citation	2
Level 5	Referral to City Attorney	0
Level 6	Referral to Water Board	0
Total		10

C.4.d.iii.(1)(d) ► Frequency of Potential and Actual Non-Stormwater Discharges by Business Category

Business Category²	Number of Actual Discharges	Number of Potential Discharges
Automotive	0	2
Building Supplies/Services	0	0
Corporation Yards	0	0
Grocery	0	0
Office	0	0
Other – Agriculture	0	0
Other – Dry Cleaners	0	0

¹Agencies to list specific enforcement actions as defined in their ERPs.

²List your Program's standard business categories.

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Other – Major Retail	0	1
Other – Pesticide Facilities	0	1
Restaurant and Food Service	0	1
Retail – Shopping Centers	0	1

C.4.e.iii ► Staff Training Summary

Training Name	Training Dates	Topics Covered	No. of Industrial/ Commercial Site Inspectors in Attendance	Percent of Industrial/ Commercial Site Inspectors in Attendance	No. of IDDE Inspectors in Attendance	Percent of IDDE Inspectors in Attendance
Industrial, Commercial and Illicit Discharge Stormwater Inspector Training Workshop	6/16/2025 6/26/25	Regional Water Board Industrial Stormwater Inspection Program; Valley Water Pollution Prevention Hotline Program Summary and Incident Responses; From Unknown Source to Identified Responsible Party; Business Inspection Case Study: Seasonal Concerns; IND/COM and IDDE Case Study; Municipal Regional Permit: Provision C.4/C.5 and More; Inspector Resources.	2	66.7%	2	66.7%
Comments: The Environmental Programs Specialist attended the Industrial, Commercial and Illicit Discharge Stormwater Inspector Training Workshop that was held on 6/16/25 in-person and the Environmental Compliance Technician watched all of the presentation slides that are posted on the SCVURPPP website on 6/26/25.						

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

Program Highlights and Evaluation

Highlight/summarize activities for reporting year:

Provide background information, highlights, trends, etc.

Summary:

Illegal Dumping

Illegal dumping continues to be a challenge and impacts City staff. The City classifies illegal dumping of all materials in the public right-of-way an IDDE actual discharge and it is reflected in the IDDE database. In most cases, the materials dumped are bulky household items such as furniture and appliances, which while not a direct threat to enter the MS4, could be comingled with other substances such as paint, cleaners, and automotive fluids. The IND/IDDE Inspector responds to these incidents and investigates to identify and locate the responsible party, which includes leaving door hangers as the situation warrants. The door hangers advise the party responsible for the incident about the issue and include a resource to have these types of materials removed by the City's franchised waste hauler. The dumping locations are random and have proven a challenge to address through digital or police surveillance.

Fire Sprinkler System Planned Water Discharges

The Environmental Programs Division (Stormwater Program) has implemented a building permit application permit review comment requiring notification if any of the permitted construction would necessitate discharging water from the building fire suppression system and if so, the Fire Sprinkler System Planned Water Discharge Form is required. In addition, the City applies this practice to one large business that occupies multiple offices/campuses within the City and has established a process that they notify the Environmental Programs of their planned fire suppression system testing and the volume and location of where this water is to be discharged. Due to staffing levels, the IND/IDDE inspector is unable to be present during all tests but is present for most. For the discharges that the City's IND/IDDE Inspector is present for, he ensures proper BMPs are installed and there is no discharge to any inlets or overland sheet flow that would result in residue from the water being deposited to hardscape where rain or irrigation would mobilize it to a storm drain. If the IND/IDDE inspector is unable to be present during the test, the discharge locations are reviewed by the Environmental Program Specialist and IND/IDDE inspector in advance of the testing discharges, and the contractor is required to send photographs of the discharge. This notification has resulted in 127 separate forms being submitted for discharge events. This regulatory approach has created considerable staff time impacts on the IND/IDDE inspector, Environmental Compliance Technician, and Environmental Program Specialist. However, staff believe this approach and added educational outreach opportunity has yielded positive results.

Fines, Fees, and Cost Recovery

The following is a summary of fines, fees, and cost recovery for remediation of discharges in FY 24-25:

1. Administrative citations: A total of three citations were issued totaling \$1,100.00. One citation was for 3 violations at a senior living facility for improper management of waste bins and litter. The other two citations were for 8 violations at a shopping center for poorly controlled food facility oil and grease in a common area.

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2. Fees: A total of ten re-inspection fees were issued, totaling \$4,340.00. Five re-inspection fees were issued to a senior living facility for improper management of waste bins and litter. Five re-inspection fees were issued to a shopping center for poorly controlled food facility oil and grease in a common area.
3. Cost Recovery (reimbursement of IND/IDDE Inspector and Programs Supervisor payroll expenses due to discharge remediation oversight):
 - No incidents required cost recovery for FY 24-25.

The City is also a regular participant in the Countywide Program's IND/IDDE AHTG to discuss countywide program strategies. Please refer to the C.5 Illicit Discharge Detection and Elimination section of the Program's FY 24-25 Annual Report for a description of the program.

C.5.d.iii.(1) ► Spill and Discharge Complaint Tracking

Spill and Discharge Complaint Tracking (fill out the following table or include an attachment of the following information)

	Number
Discharges reported (C.5.d.iii.(1)(a))	64
Discharges reaching storm drains and/or receiving waters (C.5.d.iii.(1)(b))	18
Discharges resolved in a timely manner (C.5.d.iii.(1)(c))	61

Comments:

IDDE Program Staffing

The City has one IND/IDDE inspector who acts as the primary investigator for reports of threatened or actual stormwater pollution discharges. This inspector has worked for the City for over 50 years and has a vast knowledge of the MS4 and outfall locations within the creeks. He has been the City's IND/IDDE inspector for over 16 years and is a tremendous resource to both City staff and the community with the efficiency in which he identifies and resolves discharge incidents. The Program Manager, Specialist, and Technician are also trained and equipped to respond and manage spills and discharges in the absence of the inspector. Reports of discharges, both actual and threatened, are typically responded to within the City's goal of less than 24 hours; however, if a report is received during business hours, the IND/IDDE inspector is immediately dispatched to investigate.

Summary of IDDE Investigations

IDDE investigations are done through various channels: citizen reported, inspector initiated, interdepartmental referral, and outside agency referrals. Of the 64 total discharges investigated, 40 (63%) were citizen reported, 6 (9%) were inspector initiated, 6 (9%) were interdepartmental referral, and 12 (19%) were other agency referrals. This data shows that 11% of all IDDEs investigated in FY 24-25 were through proactive City investigation or other City staff observing noncompliant conditions that warranted follow up by the investigator. This reflects effective intra-agency communication and awareness of the importance for stormwater pollution prevention by all City staff.

Unsubstantiated Reports and Inspector Response

The City documents all calls for service requiring a response to investigate any report of a threatened or actual discharge. Of the data compiled in FY 24-25, there were five reports of discharges (threatened or actual) that were determined to be unsubstantiated upon the inspector's investigation.

When a discharge is reported or observed, the inspector's first objective is to prevent and/or limit the discharge from reaching the storm drain system and/or receiving water. In FY 24-25, of all the discharges investigated, 46 (72%) were contained to the surface area and did not enter the storm drain system (either private or the MS4). Of the 18 discharges that did reach the storm drain, 13 (72%) were the result of broken water lines on either public or private land, were public utility lines within the right-of-way, or were conditionally exempt. Other discharges reaching the storm drain were miscellaneous incidents that were documented in the City's IDDE database.

Rationale for Compliance Beyond 10 Business Days

During this reporting period there were three discharges that exceeded the 10 businesses day compliance period. Summaries of these incidents are as follows:

1. 10285 S De Anza Blvd (Allario Center) - During a routine IND inspection at one of the businesses in this shopping center, it was found to have multiple violations in the common area. Waste bin lids not closed, cooking oil bins unsanitary, no second containment, grease stains. On 10/9/24, a certified NOV was mailed. Re-inspection on 10/16/24 showed the violations had not been corrected and a second NOV was sent via certified mail. Second re-inspection was done on 11/1/24 and the violations were still not corrected, so a pre-citation notice was emailed. A 3rd re-inspection was done on 11/13/24 and the violations remained, so an administrative citation for \$300 was sent via certified mail and email. On 12/10/24, a fourth re-inspection was carried out and the violations were still not corrected, so a second administrative citation (for \$600) was sent via certified mail and email. Site wasn't re-inspected again until 2/10/25 because the previous inspector retired, and by then the violations had been corrected. Billed \$900 administrative citation fees and five reinspection fees at \$434 each, totaling \$3,070.
2. 21301 Stevens Creek Blvd. (Westport Senior Living) - Complaint of waste bins for the residential building being left at the collection area all the time with open bin lids, and some loose litter. Multiple notices of violations and two administrative citations issued. Property owner was slow to implement correction resulting in almost 60 calendar days with the case not being resolved. Property was deemed compliant on 12/18/24 as there was no litter and all bins were stored within the approved trash room.
3. 10969 North Wolfe Rd. (Cupertino Shopping Center) - The trash compactor was leaking organic liquid wastewater which ran into the nearby storm drain. The Property Management company repaired the compactor; pressure cleaned the area and had the inlet and its full trash capture device serviced and cleaned. A week later the dumpster failed again. The responsible party was granted an extension to 6/12/2025 to fix the dumpster and clean the area, which was completed on 6/12/2025.

C.5.e.iii.(2)(a)&(c) ► Mobile Sources Inspections and Enforcement

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

	Number

Mobile business inspections conducted (C.5.e.iii.(2)(a))	0
Summary of the enforcement actions taken against mobile businesses during the reporting year (C.5.e.iii.(2)(c)).	
Summary: In FY 24-25 the City did not receive any IDDE reports from mobile sources.	

C.5.e.iii.(2)(b) ► Frequency of Mobile Sources Inspections by Business Type

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

Mobile Business Type ¹	Number Inspected ²
None (see comment above).	0
Comments:	

¹ Including, but not limited to, automobile washing, vehicle fueling, power washing, steam cleaning, graffiti removal and carpet cleaning.

² The number of each type of mobile business inspected

Section 6 – Provision C.6 Construction Site Controls

C.6.e.iii.(1)(a), (b), (c), (d), (e) ► Site/Inspection Totals				
Total number of construction sites requiring inspections during at least part of the Permit year; (C.6.e.iii.1.a)	Total number of active hillside sites disturbing <1 acre of soil requiring inspection (C.6.e.iii.1.b)	Number of High Priority Sites (sites disturbing < 1 acre of soil requiring storm water runoff quality inspection) (C.6.e.iii. 1.d)	Number of sites disturbing ≥ 1 acre of soil (C.6.e.iii.1.c)	Total number of storm water runoff quality inspections conducted (include only Hillside Sites, High Priority Sites and sites disturbing 1 acre or more) (C.6.e.iii. 1.e)
9	1	3	5	230
Comments: On August 21, 2024, the Public Works Development Services Division prepared a reminder letter to all site developers and/or owners disturbing one acre or more of soil, hillside projects, and high priority sites to prepare for the upcoming wet season. In FY 24-25, all regulated project construction sites were inspected monthly or until construction was completed by the Public Works Engineering Inspector. Monthly inspections were documented and saved in the City's C.6 database which is maintained by the Public Works Engineering Inspector. When potential/actual discharge violations are observed, the Public Works Engineering Inspector requires immediate correction and monitors on-going compliance. The City's IND/IDDE inspector also conducts periodic inspections of these site perimeters and if deficiencies are identified, the inspector will address the issue(s) and coordinate further site oversight with the Public Works Engineering Inspector.				
Provide the number of inspections that are conducted at sites not within the above categories as part of your agency's inspection program and a general description of those sites, if available or applicable. Does not apply				

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

	Enforcement Action (as listed in ERP) ¹	Number Enforcement Actions Issued
Level 1 ²	Verbal Warning	16
Level 2	Written Notice	0
Level 3	Pre-Citation Letter and/or Administrative Citation Fines	0
Level 4	Stop Work Order	0
Level 5	Referral to City Attorney	0
Level 6	Referral to Santa Clara County District Attorney/Regional Water Board	0
Level 7	City Remediation of a Nuisance	0
Total		16

C.6.e.iii.(1)(g), ► Illicit Discharges

	Number
Number of illicit discharges, actual and potential, of sediment or other construction-related materials	0

¹ Agencies should list the specific enforcement actions as defined in their ERPs.

² For example, Enforcement Level 1 may be Verbal Warning.

C.6.e.iii.(1)(h) ► Corrective Actions	
Indicate your reporting methodology below.	
	Permittee reports multiple discrete potential and actual discharges at a site as one enforcement action.
X	Permittee reports the total number of discrete potential and actual discharges on each site.
	Number
Enforcement actions or discrete potential and actual discharges fully corrected within 10 business days after violations are discovered or otherwise considered corrected in a timely period (C.6.e.iii.1.h)	44
Comments: Enforcement for potential and/or actual discharges identified during site inspections are investigated and resolved consistent with the Construction Site Control ERP. In FY 24-25, the following violations were identified and resolved by the City's Public Works Engineering Inspector: • Erosion Control = 17 • Sediment Control = 17 • Good Site Management = 10 When an actual or potential discharge is observed by the inspector, the construction site project manager is typically given 48 hours to correct the violation. If rainfall is imminent, the responsible person is required to correct the violation immediately. Of the 44 total potential and/or actual discharges that were identified, all 44 were corrected within 10 business days.	

C.6.f.iii ► Staff Training Summary				
Training Name	Training Dates	Topics Covered	Total Number of C.6 inspectors (both municipal and non-municipal staff)	No. of C.6 inspectors in Attendance (both municipal and non-municipal staff)
Comments: SCVURPPP did not hold a countywide training for Construction Site Stormwater Inspectors this FY. The construction inspector attended the 2023 training and plans on attending the 2025 training in Fall.				

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

C.7.g.iii.(1) ► Reporting						
Submit a table listing the types of outreach programs implemented during that Permit year along with a brief description. The table should be a cumulative table showing the number, if applicable, of each type of outreach campaigns or events occurring during each Permit year. Information provided in the tables below are local activities only, please refer to the C.7 Public Information and Outreach section of the SCVURPPP FY 24-25 Annual Report for outreach activities conducted Countywide by the Program.						
Type of Outreach Program Implemented	Brief Description of Current Year Campaigns	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
C.7.a. Outreach Campaigns	Not locally applicable- see SCVURPPP Annual Report	Not locally applicable- see SCVURPPP Annual Report	Not locally applicable- see SCVURPPP Annual Report	Not locally applicable- see SCVURPPP Annual Report		
C.7.c. Public Outreach and Citizen Involvement Events	In partnership with Creek Connections Action Group, City of Cupertino hosts creek cleanup events.	2 cleanup events were held- 2022 Coastal Cleanup Day and 2023 National River Cleanup Day.	Two cleanup events were held- 2023 Coastal Cleanup Day and 2024 National River Cleanup Day.	Two cleanup events were held- 2024 Coastal Cleanup Day and 2025 National River Cleanup Day.		
	Grassroots Ecology hosts Community and College Field Trips at McClellan Ranch Preserve and Blackberry Farm- Students learned about field techniques in creek science and environmental and ecological implications of different chemical	237 students participated.	Six field trips were held.	Three field trips were held (includes college groups and San Jose Conservation Corps)		

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C.7 – Public Information and Outreach

	and biological parameters. Students measured water chemistry and learned to identify benthic macroinvertebrates and common riparian vegetation. Lessons also included discussions on water pollution and its effects on ecosystem health. Field trips connected the different activities and imparted students with a big picture understanding of the watershed.					
C.7.d. Watershed Stewardship Collaboration	Watershed Day- Watershed Awareness Volunteer Event- Grassroots Ecology hosted Watershed Day in collaboration with the City of Cupertino, Santa Clara Valley Audubon Society, and Friends of the Stevens Creek Trail. A four-hour restoration and educational event where visitors rotated between education stations, bird walks along the creek, and invasive species removal in the meadow.	One community event at Watershed Day, organized by Grassroots Ecology with 119 volunteers. The City of Cupertino Environmental Programs Staff showcased an Enviroscope, a watershed model, to educate the public on watersheds and pollution prevention.	One community event at Watershed Day, organized by Grassroots Ecology with 67 volunteers. The City of Cupertino Parks & Rec Staff showcased an Enviroscope, a watershed model, to educate the public on watersheds and pollution prevention.	Watershed Day was not held this year, however there were 24 volunteer workdays (public and private)		
Type of Outreach Program Implemented	Brief Description	Number of outreach campaigns or events occurring during each Permit Year, if applicable				
		FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27

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C.7 – Public Information and Outreach

C.7.e. School-Age Children Outreach	The City hosts a Third Grade Education and Field Trip Program. Started in 1995, it continues to be refined to update and incorporate new messages. Students learn about general water and habitat pollution prevention and creek concepts precede the actual creek walk. Cupertino's docents observe what each teacher has spent time in the classroom reviewing to prepare the students for the field trip.	Total participation- Schools hosted:12 Tours: 24 Students: 968	Total participation- Schools hosted: 9 Tours: 15 Students: 641	Total participation- Schools hosted: 13 Tours: 25 Students: 1013		
	Annual Earth Day Poster Challenge for grades K-8 children	One contest; total of 56 submissions throughout Santa Clara County. Cupertino students submitted entries and there were two local winners.	One contest; total of 67 submissions throughout Santa Clara County. Cupertino students submitted entries and there was one local winner.	One contest; total of 78 submissions throughout Santa Clara County. 14 Cupertino students submitted entries and there were 2 local winners.		
	High School Youth Stewards program-The Grassroots Ecology Youth Stewards gathered weekly at McClellan for activities and educational discussions revolving	25 high school students participated.	25 high school students participated.	17 Youth Steward Sessions were held. 28 high school students participated.		

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C.7 – Public Information and Outreach

	around topics such as local watersheds, native flora and fauna, and restoration ecology. Stewards experienced the preserve through active restoration as well as through creative writing/art prompts and scientific observation and analysis.					
C.7.f. Outreach to Municipal Officials	City Council receives an annual presentation about the City's stormwater pollution program during the parcel fee renewal process.	City Council received the presentation in June 2023.	City Council received the presentation in June 2024.	City Council received the presentation in June 2025.		

C.7.g.iii.(2) ► Stormwater Pollution Prevention Education

No change.

Section 9 – Provision C.9 Pesticides Toxicity Controls

C.9.a. ► Implement IPM Policy or Ordinance					
Is your municipality implementing its IPM Policy/Ordinance and Standard Operating Procedures?			X	Yes	No
If no, explain: N/A					
Links to IPM policies or ordinances and IPM standard operating procedures: Updated link: https://chl-lf-app.cupertino.org/WebLink/Browse.aspx?id=1048721&dbid=0&repo=CityofCupertino&					
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, carbamates, fipronil, indoxacarb, diuron, and diamides. A separate report can be attached as evidence of your implementation.					
Trends in Quantities and Types of Pesticide Active Ingredients Used¹					
Pesticide Category and Specific Pesticide Active Ingredient Used	Amount ² of Active Ingredient				
	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
Organophosphates					
Active Ingredient Chlorpyrifos	0	0	0		
Active Ingredient Diazinon	0	0	0		
Active Ingredient Malathion	0	0	0		
Pesticide Category and Specific Pesticide Active Ingredient Used	Amount				
	FY 22-23	FY 23-24	FY 24-25	FY 25-26	FY 26-27
Pyrethroids					
Active Ingredient Metofluthrin	0	0	0		
Active Ingredient Bifenthrin	0	0	0		

¹ Includes all municipal structural and landscape pesticide usage by employees and contractors.

² Weight or volume of the active ingredient, using same units for the product each year. Please specify units used. The active ingredients in any pesticide are listed on the label.

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C.9 – Pesticides Toxicity Controls

Active Ingredient Cyfluthrin	0	0	0		
Active Ingredient Beta-Cyfluthrin	0	0	0		
Active Ingredient Cypermethrin	0	0	0		
Active Ingredient Deltamethrin	0	0	0		
Active Ingredient Esfenvalerate	0	0	0		
Active Ingredient Lambda-Cyhalothrin	0	0	0		
Active Ingredient Permethrin	0	0	0		
Carbamates					
Active Ingredient Carbaryl	0	0	0		
Active Ingredient Aldicarb	0	0	0		
Indoxacarb	0	0	0		
Diuron	0	0	0		
Diamides					
Active Ingredient Chlorantraniliprole	0	0	0		
Active Ingredient Cyantraniliprole	0	0	0		
Neonicotinoids					
Active Ingredient Imidacloprid	0	0	0		
Active Ingredient Acetamiprid	17 fl oz	0	3.817 gal		
Active Ingredient Dinotefuran	0.6 fl oz	44.4 lbs	1.2 oz		
Fipronil	0	0	0		

Reasons for increases in use of pesticides that threaten water quality:

Woolly Aphids and the Giant Whitefly continue to be a major problem affecting trees in the City. Staff use the products Tristar and Safari, which contain the active ingredients Acetamiprid and Dinotefuran to control scale, aphids, and whiteflies on the City's Ash, Cork Oak, and Olive trees. In FY 24-25, Dinotefuran use was down compared to FY 23-24. In FY 24-25, Acetamiprid use was up because staff had to treat 305 more trees. Applications are made after blossoms are no longer present. Pentra-Bark was used in conjunction with Tristar and Safari. Pentra-Bark is a penetrating surfactant and is applied to the basal trunk at very low pressure to reduce the chance of drift or runoff. In the past staff have tried biological control releases of parasitic wasp and ladybird beetles, but there was little to no success with those methods to control the issues.

IPM Tactics and Strategies Used:

- The Grounds division is using mulch to control weeds in large non-landscaped areas. They are obtaining that mulch through the Environmental Programs Assistant as part of SB1383 procurement requirements to use products made from recovered organic materials.
- The Grounds division has been trimming fence lines for the control of growth instead of using herbicides.
- The Grounds division is hand-pulling some weeds if they are sparse, but with the reduction in staff, it has become difficult, so they are left with fewer options other than the use of herbicides and line trimmers.
- The Grounds division is using SureGuard EZ, which is a pre-emergent, with amazing results. This has reduced the need for post-emergent herbicide use.
- The Grounds division has removed ivy, which needed herbicides to kill off, and now uses mulch in those areas.
- The Trees division has been using mulch instead of using herbicides.
- The contractor for rodents has been using traps at the Senior Center.
- At the McClellan Ranch Preserve, there is still no use of pesticides, herbicides, or rodenticides. The only exception involves habitat restoration work by Grassroots Ecology, which involves applying herbicides using targeted cut-and-dab methods to manage the invasive Tree of Heaven.
- At the McClellan Ranch Preserve, live and dead rodent traps are used.
- The contractor for Blackberry Farm Golf Course did not use any pesticides, herbicides, or rodenticides this year. This was a very light year for disease. He was able to keep the greens as dry as possible to prevent disease.
- Mole and gopher traps are being used at the golf course instead of chemicals.
- English Daisies and weeds are hand-pulled at the golf course.
- The contractor for the golf course uses the weed trimmer.
- The Gophernator Carbon Monoxide Machine was successfully used at the golf course to help exterminate gophers.

C.9.b ► Train Municipal Employees	
Enter the number of employees that apply or use pesticides (including herbicides) within the scope of their duties.	15
Enter the number of these employees who received training on your IPM policy and IPM standard operating procedures within this reporting year.	15
Enter the percentage of municipal employees who apply pesticides who have received training in the IPM policy and IPM standard operating procedures within this reporting year.	100%
Type of Training/Comments: - Cupertino Grounds and Trees Division Staff attended the following trainings: - April 22-25, 2025 – Western Chapter ISA Conference, Tucson, AZ - Various continuing education courses with some on IPM City staff continue to provide ongoing communication throughout the year about updating practices to use the least amount of product possible to control issues. In addition to safety training, IPM methodology is communicated to pest management staff in regular meetings with their supervisors.	

C.9.c ► Require Contractors to Implement IPM			
Did your municipality contract with any pesticide service provider in the reporting year, for either landscaping or structural pest control?	☒	Yes	No
If yes, did your municipality evaluate the contractor's list of pesticides and amounts of active ingredients used?	☒	Yes	No
If your municipality contracted with any pesticide service provider, briefly describe how contractor compliance with IPM Policy/Ordinance and SOPs was monitored The City of Cupertino employs two contractors (one for buildings and facilities and one for the golf course) who have worked for the City for more than ten years. Each contractor reports to one assigned City staff supervisor from whom they are required to obtain staff approval before applying any pesticides and with whom they have regular in-person contact. Monthly pesticide usage reports for any product applied inside or outside of City buildings are reviewed by City Environmental Division staff to provide an additional level of insurance that IPM application restrictions are continually being implemented. The City of Cupertino's IPM Policy and contract specifications require that contractors follow IPM techniques and use pesticides only as a last resort to protect the health and safety of the community. Additionally, contractors are not allowed to use pesticides of concern. Type of Training/Comments: - The contracted applicator for Blackberry Farm Golf Course attended the following trainings: - February 4-5, 2025 - Golf Course Superintendents Conference & Show – San Diego, CA - March 5-6, 2025 – Sierra Pacific Turf Supply Spring Symposium – Use of Pesticides Wisely, Brooks, CA - May 31 – June 4, 2025 – Bermuda Golf Superintendents Association – taught the class "How to Reduce Pesticide Use"			
If your agency did not evaluate the contractor's list of pesticides and amounts of active ingredients used, provide an explanation here. N/A			

C.9.d ► Interface with County Agricultural Commissioners

How did your municipality communicate with the County Agricultural Commissioner to: (a) get input and assistance on urban pest management practices and use of pesticides or (b) inform them of water quality issues related to pesticides?

See Section 9 of the SCVURPPP FY 24-25 Annual Report for summary of communication with the Santa Clara County Agricultural Commissioner.

Did your municipality report any observed or citizen-reported violations of pesticide regulations (e.g., illegal handling and applications of pesticides) associated with stormwater management, particularly the California Department of Pesticide Regulation (DPR) surface water protection regulations for outdoor, nonagricultural use of pyrethroid pesticides by any person performing pest control for hire?

	Yes	No
		X

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.

N/A

C.9.e.ii (1) ► Public Outreach: Point of Purchase

Provide a summary of public outreach at point of purchase, and any measurable awareness and behavior changes resulting from outreach (here or in a separate report); **OR** reference a report of a regional effort for public outreach in which your agency participates.

Summary:

See the C.9 Pesticides Toxicity Control section of SCVURPPP's FY 24-25 Annual Report for information on point of purchase public outreach conducted countywide and regionally.

C.9.e.ii (2) ► Public Outreach: Pest Control Contracting Outreach

Provide a summary of outreach to residents who use or contract for structural pest control and landscape professionals); **AND/OR** reference a report of a regional effort for outreach to residents who hire pest control and landscape professionals in which your agency participates.

Summary:

See Section 7 and Section 9 of SCVURPPP's FY 24-25 Annual Report for a summary of outreach to residents and businesses that use or hire structural pest control and landscape professionals. In addition, see the FY 24-25 Watershed Watch Campaign Final Report included within Section 7 of SCVURPPPs FY 24-25 Annual Report.

C.9.e.ii.(3) ► 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); **AND/OR** reference a report of a regional effort for outreach to pest control operators and landscapers in which your agency participates.

Summary:

See the C.9 Pesticides Toxicity Control section of SCVURPPP's FY 24-25 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.

C.9.f ► Track and Participate in Relevant Regulatory Processes

Summarize participation efforts, information submitted, and how regulatory actions were affected; **AND/OR** reference a regional report that summarizes regional participation efforts, information submitted, and how regulatory actions were affected.

Summary:

During FY 24-25, we participated in regulatory processes related to pesticides through contributions to SCVURPPP and CASQA. For additional information, see the Pesticide Annual Report prepared by CASQA in SCVURPPP's FY 24-25 Annual Report.

C.9.g.iii ► Evaluate Implementation of Pesticide Source Control Actions

(For the FY 24-25 Annual Report Only) Submit an evaluation of Pesticide Source Control actions, including an assessment of the effectiveness of IPM efforts, a discussion of any improvements made in the preceding five years, and any changes in water quality in urban creeks. Also include a brief description of one or more pesticide-related areas the permittee will focus on enhancing in the next permit term.

Summary:

See Section C.9 Pesticides Toxicity Control of SCVURPPP's FY 24-25 Annual Report for a report that includes the following:

- An evaluation of the effectiveness of source control measures implemented;
- Changes in water quality regarding pesticide toxicity in urban creeks;
- Improvements made to the City of Cupertino's IPM Program in the past five years; and
- Pesticide-related area(s) that the City of Cupertino will focus on enhancing during the next permit term.

Section 10 – Provision C.10 Trash Load Reduction

C.10.a.i ► Trash Load Reduction Summary	
For population-based Permittees, provide 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 reduction percentage on the information presented in C.10.b i-v and C.10.f.i-ii. Provide a discussion of the calculation used to produce the reduction percentage.	
Trash Load Reductions	
Percent Reduction in All Trash Management Areas (TMAs) due to Full Trash Capture Systems (as reported C.10.b.i) ¹	56.4%
Percent Reduction in all TMAs due to Control Measures Other than Full Trash Capture Systems (as reported in C.10.a.ii(b) & C.10.b.iii) ^{1,2}	43.6%
Subtotal for Above Actions	100%
Trash Reduction Credits and Offsets (Optional)	
Reduction Credits due to Jurisdiction-wide Source Control Actions (as reported in C.10.b.v) ³	--
Reduction Offset Associated with Additional Creek and Shoreline Cleanups (as reported in C.10.f.i)	--
Reduction Offset Associated with Direct Trash Discharge Controls (as reported in C.10.f.ii)	--
Total (Jurisdiction-wide) % Trash Load Reduction through FY 2024-25	100%

¹ See Appendix 10-1 for changes between 2009 and FY 24-25 in trash generation by TMA as a result of Full Capture Systems and Other Trash Control Measures.

² This percentage includes reductions associated with other trash controls implemented to address moderate, high or very high trash generating areas in the public right-of-way and on applicable private lands.

³ To claim a load percentage reduction value, Permittees must provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and reduce trash by the claimed value. Permittees who have not implemented an approved Direct Discharge Control Plan (DDCP) may no longer claim source control actions implemented under previous Permits (i.e., foam foodware and single-use plastic bags).

C.10.a.i ► Trash Load Reduction Summary (Continued)

State (Y/N) if your agency has: 1) been granted additional time to meet the 100% compliance benchmark; 2) met the 100% compliance benchmark as on June 30, 2025; and/or 3) submitted a notice of non-compliance and an updated Long-term Trash Load Reduction Plan in accordance with Permit Provision C.10.d.ii.

1. Was your agency **granted additional time** until December 31, 2025 or June 30, 2026⁴ to meet the 100% compliance benchmark because your agency developed and implemented an approved direct discharge control plan (DDCP) as described in Provision C.10.f.ii.? ☐ Yes ☒ No

2. Did your agency **meet the 100% trash load reduction benchmark** as of June 30, 2025? Mark N/A if your agency marked “Yes” to question #1. ☒ Yes ☐ No ☐ NA

3. If your agency **checked “No” to question #2**, did your agency submit a notice of non-compliance and develop and submit an updated Trash Load Reduction Plan by June 30, 2025? Mark N/A if your agency marked “Yes” to question #1 or #2. If your agency marks “No” to this question, provide additional details below regarding why your agency did not submit an updated Trash Load Reduction Plan by June 30, 2025. ☐ Yes ☐ No ☒ NA

Discussion of Permittee Trash Load Reduction and the Load Reduction Calculation:

As of June 30, 2025, the City has attained and is in compliance with the 100% trash load reduction based on the load reduction calculation methodology included in the MRP. The City continues to implement a robust set of structural trash control measures (e.g., full trash capture systems), citywide source control actions, a Private Land Drainage Area (PLDA) trash control program, and numerous other trash control measures to address trash generation within the City’s jurisdictional areas. Descriptions of these control measures are included in this section (C.10 – Trash Load Reduction) of the City’s FY 24-25 Annual Report. The most recent versions of the City’s Trash Generation Map, which includes baseline trash generation, Trash Management Areas (Areas), trash full capture systems, and other control measures can be downloaded at:

- Pdf version - <https://scvurppp.org/trash-maps/>.
- ArcGIS on-line version (available only to Regional Water Board staff) - <https://experience.arcgis.com/experience/2450b59dc80449c29e6b4092bf0a7633>

⁴ East Contra Costa County Permittees have until June 30, 2026 to achieve 100 % via full trash capture, or equivalent, contingent on developing and implementing a Direct Discharge Control Plan (DDCP) as described in Provision C.10.f.ii.

C.10.a.ii(a) ► Full Trash Capture Systems – Population-based Permittees		
C.10.c ► Full Trash Capture Systems – Flood Management Agencies		
Provide the following:		
1) Total number and types of full capture systems (publicly and privately-owned) installed during FY 24-25, and prior to FY 24-25, including inlet-based and large flow-through or end-of-pipe systems, and qualifying low impact development (LID) required by permit provision C.3. 2) Total land area (acres) treated by full capture systems for population-based Permittees and total number of systems for flood management agencies compared to the total required by the permit.		
Type of System	# of Systems	Areas Treated (Acres) ⁵
Installed in FY 24-25		
None	--	--
Installed Prior to FY 24-25⁶		
Catch Basin Insert Devices (Public)	238	281.1
Catch Basin Insert Devices (Private)	591	295.2
Full Trash Capture Systems installed by bordering Permittees with treatment areas extending into City of Cupertino	--	1.3
Total for all Devices or Systems Installed To Date	829	577.6
Total # of Systems Required by Permit (Flood Management Agencies)		N/A

⁵ In annual reports from previous FYs, the City included Multi-beneficial Stormwater Treatment Systems (i.e., bioretention systems) as full trash capture systems. In FY 24-25, Water Board staff agreed to presume that these systems are full trash capture systems until final criteria can be developed that establish the conditions under which these multi-benefit systems can be considered full trash capture. Given the uncertainties in the criteria that will eventually be developed, the City decided to not count these multi-benefit systems as full trash capture in FY 24-25. The City reserves the right to account for these systems as full trash capture in future FYs. To demonstrate that the land areas draining to these multi-benefit systems are achieving the MRP low trash generation goal, the City: 1) added the associated private properties to its Private Land Drainage Area (PLDA) trash inspection program and conducted trash inspections on these properties (see table C.10.a.ii(b)); and 2) added land areas in the public right-of-way that drain to these multi-benefit systems into its On-land Visual Trash Assessment (OVTA) program (see table C.10.b.iii(b)).

⁶ Drainage boundaries (i.e., areas treated) for previously installed catch basin insert devices (public) and catch basin insert devices (private) were reevaluated and/or reclassified in FY 24-25. Based on these analyses, some drainage boundaries were refined based on more accurate information on drainage patterns and the configuration of the City's MS4. These refinements are reported in this table and in Appendix 10-1. Areas treated include jurisdictional and non-jurisdictional lands (e.g., public K-12 schools and colleges, and freeways).

C.10.a.ii(b) ► Trash Generation Area Management – Private Lands

Provide a summary of implementation actions and progress towards meeting the July 1, 2025 requirement for all private lands that are moderate, high, or very high trash generating, and that drain to storm drain inlets that Permittees do not own or operate (private), but that are plumbed to Permittees' storm drain systems. Include descriptions of any trash control measures implemented, or caused to be implemented, by your agency, including full trash capture systems and/or trash discharge control actions equivalent to or better than full trash capture systems. For trash discharge control actions equivalent to or better than full trash capture systems that were implemented on private lands, summarize the methods used to demonstrate that trash discharges are controlled and the extent to which these methods were implemented in FY 24-25.

Summary of Implementation Actions and Trash Load Reduction Progress:

As described in MRP 3.0 Provision C.10.a.ii(b), private properties that 1) generate moderate, high, or very high levels of trash, 2) are plumbed to the City's MS4, and 3) are not already addressed by a FTC system/device are required to install and maintain a FTC system/device or be managed by trash discharge control actions equivalent to or better than a FTC system/device by July 1, 2025. To address trash contributions from these properties, which are referred to as Private Land Drainage Areas (PLDAs), the City began implementing a PLDA Trash Inspection Program (TIP) in FY 23-24 and continued implementation through FY 24-25. There are a total of 41 PLDAs in the City. All acreage associated PLDAs are included in a new TMA (i.e., TMA 10) which was established in FY 24-25 to allow for easier tracking of this Program in the future.

In FY 22-23, the City developed a TIP Plan that details legal authority and identifies roles and responsibilities, inspection procedures, and recordkeeping requirements. In FYs 23-24 and 24-25, the City inspected all 41 PLDAs. For PLDA parcels with observed trash levels on the property greater than low trash generation, property owners and/or managers were required to implement additional trash control measures, up to and including installation of FTC systems, to achieve low trash generation. The resulting trash load reduction in FY 24-25 from the implementation of the City's PLDA Program is 21.8%.

Additional details on the TIP can be provided in Cupertino's TIP Plan, which is available upon request.

C.10.b.i and ii ► Trash Reduction – Full Capture Systems

Provide the following:

- 1) Jurisdiction-wide trash reduction in FY 24-25 attributable to full capture systems implemented in each TMA;
- 2) The total number of full capture systems installed to-date in your jurisdiction;
- 3) The percentage of systems in FY 24-25 that exhibited significant plugged/blinded screens or were $\geq 50\%$ full when inspected or maintained;
- 4) A narrative summary of any maintenance issues and the corrective actions taken to avoid future performance issues; and
- 5) A certification that each full capture system is operated and maintained to meet full capture system requirements in the permit.

TMA	Jurisdiction-wide Reduction (%)	Total # of Full Capture Systems	% of Systems Exhibiting Plugged/Blinded Screens or $\geq 50\%$ full in FY 24-25
1	10.8%	829	25%
2	21.7%		
3	3.8%		
4	9.4%		
5	1.9%		
7	1.2%		
8	3.0%		
9	0.2%		
10	4.3%		
Total	56.4%		

Summary of Maintenance Issues and Corrective Actions

Roadway Trash Full Capture Device Summary

All publicly owned full trash capture (FTC) devices along roadways in Cupertino are connector pipe screens. These systems are small inlet-based devices that treat surface area runoff entering the catch basin with the FTC device. Inspection, cleaning, and maintenance of inlets equipped with these devices is performed twice per year (typically late summer/early autumn) to prepare for the rainy season and occurs again post-rainy season (typically in spring). Although there are 829 FTC devices installed within the City, 591 are privately owned and maintained. As of June 30, 2025, the City owns a total of 238 FTC devices, 200 of which are maintained by the City and are within our ROW. The City cleaned those 200 devices twice during FY 24-25, for a total of 400 cleanings. Of those 400 cleanings, 98 FTC devices were found to be $>50\%$ full (25%). Each device is removed, inspected, cleaned, and the interior of the catch basin is vacuumed. In FY 21-22, the City purchased a vactor truck to perform this work. There is a two-person crew on the truck that performs the service, and they worked closely with the Program Supervisor until his retirement and now work with the Program Specialist for any issues encountered.

Curb Inlet Screens as Trash Capture, FTC Device Maintenance, Street Sweeping

The City's GIS Department has developed an asset management system which tracks the twice-annual inspection and maintenance of publicly owned inlet-based FTC devices. In FY 24-25, City maintenance crews reported 25% of the inlet inspections found FTC devices that were blinded more than 50%. Of the 25%, many of these inlets contained leaf debris from adjacent tree canopies.

The City continues to perform street sweeping in both residential and commercial areas. Commercial streets were swept weekly and residential streets were swept bi-monthly. The commercial areas all have a high percentage of FTC devices and curb inlet screens. The enhanced weekly sweeping has a positive impact in the performance of the FTC devices and curb inlet screens. In FY 24-25 the City recorded sweeping a total of 2,534 curb miles in commercial areas removing a total of 1,185 cubic yards of debris. Residential areas recorded sweeping 5,802 curb miles removing 3,282 cubic yards of debris.

The City's total inventory of curb inlet screens is 273. Of that number, 139 curb inlet screens are paired with FTC devices for an added layer of trash capture. The curb inlet screens are an integral component in an effective street sweeping program by keeping litter at street level and out of the inlet where the FTC device is the sole structural method of keeping trash from entering the lateral and ultimately the creeks.

Public Parks and City Facility Trash Full Capture

Approximately 15 years ago, the City installed small inlet-based FTC devices in most of the park and building facility parking lots. These devices have been part of a maintenance agreement with the manufacturer, Revel Environmental (REM). REM performs inspection, cleaning, and replacement as-needed three times each calendar year.

Certification Statement:

The City of Cupertino certifies that a full capture system maintenance and operation program is currently being implemented to maintain all applicable systems in manner that meets the full capture system requirements included in the Permit.

Did your agency provide the names and locations of new and existing full trash capture systems to the County vector control agency for FY 24-25 ?

☒

Yes

☐

No

☐

N/A

C.10.b.iii(a) ► Trash Reduction – Other Trash Management Actions

C.10.c ► Requirements for Flood Control Agencies

Provide a summary of trash control actions other than full capture systems, jurisdictional source controls, and trash control actions on private lands that were implemented within each TMA in FY 24-25, including the types of actions, levels, timing, frequency, and areal extent of implementation, whether actions are new, including initiation date, and information relevant to effective implementation of the action or combination of actions.

TMA	Summary of Trash Control Actions Other than Full Capture Systems
TMA 1	There were no additional trash management actions or applicable full trash capture projects within this TMA.
TMA 2	As standard conditions of approval (COAs) for new and redeveloped commercial properties, the City required the following in this TMA (High Trash Generation Area) for one existing shopping center: <u>19925 Stevens Creek – Office Building (4.34-acre site)</u> 1. Installation and treatment of all storm drain inlets on the property (2/2 inlets) with State-certified trash full capture devices. Installation of “No Dumping Drains to Bay” medallions on all inlets on the site. 2. Installation of one waste trio receptacle set (trash/recycling/compost) adjacent to the public right-of-way for pedestrian and community use. Trios are required to be maintained by the property owner in perpetuity under staff’s authority to enforce the City’s Litter Prevention Ordinance.
TMA 3	There were no additional trash management actions or applicable full trash capture projects within this TMA. This TMA primarily consists of a large PG&E Service Center which is inspected through the C.4 IND program.
TMA 4	As standard conditions of approval (COAs) for new and redeveloped commercial properties, the City required the following in this TMA (High Trash Generation Area) for new housing development: <u>10700 S. De Anza Blvd. – Taiwanese Bistro</u> 1. Construction of one new covered trash enclosure.
TMA 5	As standard conditions of approval (COAs) for new and redeveloped commercial properties, the City required the following in this TMA (High Trash Generation Area) for new housing development: <u>22516 Stevens Creek Blvd – Alan Row Housing Project (0.67-acre site)</u> 1. Installation and treatment of all storm drain inlets on the property (8/8 inlets) with State-certified trash full capture devices; 2. Installation of “No Dumping Drains to Bay” medallions on the one inlet on the site. TMA 5 contains one of the City’s two trash hot spot areas, this one being Stevens Creek. Staff conduct extra trash cleanups in this area periodically. No additional cleanups were conducted in FY 24-25.

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C.10 – Trash Load Reduction

TMA 7	There were no additional trash management actions or applicable full trash capture projects within this TMA. This TMA consists of city parks, schools, and churches. It is partially treated by full capture devices within neighboring TMAs. City parks continue to be maintained multiple times per week by maintenance crews and many City parks and City facilities have inlet- based trash full capture devices installed in parking areas used by patrons of the facilities. The City contracts with the trash full capture vendor, REM, to inspect and clean the devices three times per year. This TMA contains the site of the second of two creek hot spots (the other being Stevens Creek as described in TMA 5 above) and is the location of both of the annual community creek clean up events (Coastal Clean Up Day and National River Clean Up Day). FY 24-25, Regnart Creek was again the site for National River Cleanup Day and Coastal Cleanup Day. The selection of this new area allows access to a portion of Calabazas Creek and runs along the newly opened Regnart Creek Trail. These events ran efficiently and the City will likely plan future community-based creek clean up events at this location.
TMA 8	With the exception of approximately 12.49 acres of multi-family residential property (one apartment complex) and 17.89 acres of professional office and medical buildings (three total parcels), this TMA is a C.3. regulated project wherein all drain inlets that connect to the City's storm drain system are treated with full capture and/or LID. The project which comprises most of this TMA is a new corporate campus. Apart from the visitor center, this campus is not open to the general public.
TMA 9	TMA 9 is primarily comprised of residential properties and as such, is a low trash generation area. This area does however contain two public golf courses along a riparian area which are inspected as part of the IND program.
TMA 10	TMA 10 includes all land areas identified as Private Land Drainage Areas (PLDAs).
TMA 1,2, 3, 4, 5, 7, and 8	Anti-littering enforcement: Litter Prevention municipal code Section 9.18.215 requires private commercial property owners to maintain a litter-free site, including parking lots and sidewalks at the perimeter of their property. City staff enforce compliance during IND inspections and in response to reports from the public and agency staff through the IDDE program. Re-inspection fees may be assessed for each staff visit to verify compliance after the initial inspection. An annual courtesy letter is mailed to property owners and site operators informing them their commercial site will be inspected at some point within the year and any deficiencies that cannot be resolved while the inspector is on site will result in a \$434 reinspection fee (per inspection) to cover the cost of the inspector's time and to incentivize active site management for trash and other pollutant discharges (actual or potential) and appropriate and effective implementation of BMPs. Refer to Sections C.4 and C.5 of this report for additional information concerning enforcement through the IND and IDDE program.
TMA 5, and 7	On-land Cleanup: Cleanups were conducted at one of the City's two (former) hot spots. Regnart Creek was selected again as the location of the annual community creek clean up events during May and September. The selection of this area allows access to a portion of Calabazas Creek and runs along the newly opened Regnart Creek Trail. The City did not claim this as an additional trash reduction credit or offset.

TMA 1, 4, 5, and 8	Other Types of Actions: The Environmental Programs Division (Stormwater Program) reviews residential and non-residential development and construction projects at the time of permit submittal. Through this process the City requires full trash capture systems on properties that connect to the City's storm drain system at all commercial and multi-family project sites. Maintenance of the devices is re-checked during IND and IDDE inspections. In FY 24-25 a total of four reviewed projects were completed in TMA 2, 5, and 10, which resulted in the following: 1. 31 inlet-based full trash capture devices installed; 2. 31 "No Dumping Drains to Bay" medallions installed.
TMA 1, 2, 4, 5, and 8	Improved Trash and Cigarette Filter Management: The City requires commercial and multi-family residential redevelopment project owners to permanently install and maintain outdoor public waste/recycling/compost "trios" with a cigarette filter urn to provide disposal opportunities for pedestrians. Trios and cigarette urns are requested (this is not currently codified in the municipal code) to be installed on private property adjacent to the public sidewalk to provide convenient opportunities for pedestrians walking with food packaging/beverage containers to dispose of their trash and cigarette filters. In FY 24-25 in TMA 2: 1. 1 litter trio installed; There were fewer cigarette urns installed as Apple has established designated smoking areas and have already provided cigarette filter urns in these locations, so they were only required to install the trios. Additionally, due to the City's smoking ordinance, cigarette urns may not be installed near building entrances and in the case of one restaurant, this requirement was not enforced as it would have been in conflict with the municipal code.
TMA 1, 2, 3, 4, 5, 7, and 8	Street Sweeping: Street sweeping was conducted weekly in all retail and commercial areas (high and medium trash generation areas), as well as residential areas. In FY 24-25, a total of 8,336 miles were swept, and a total of 4,467 cubic yards were collected.
All TMAs	Storm Drain Inlet Inspection/Cleaning/Summary: The City has developed an asset management system (CityWorks) that tracks all City owned and maintained stormwater structures, inlets, trash full capture devices, auto-retractable curb screens, no dumping inlet medallions, and includes maintenance history. This management system shows the following in all TMAs: 1. 95% of all City maintained storm drain inlets have "No Dumping Drains to Bay" medallions installed; 2. 200 City owned and maintained storm drain inlets are fitted with State Water Board certified full trash capture devices (connector pipe screen style); 3. 100% of the above referenced 200 storm drain inlet full trash capture devices were inspected and cleaned twice during FY 24-25; 4. 273 City owned and maintained storm drain inlets are fitted with retractable curb inlet screens (screens are inspected for functionality during the annual storm drain inlet inspections); 139 City owned and maintained storm drain inlets are fitted with both retractable curb inlet screens and trash full capture devices.

C.10.b.iii(b) ► Trash Reduction – Other Trash Management Actions

Provide the following:

- 1) A summary of the on-land visual assessments conducted in each TMA to demonstrate improvements in the levels of trash generation associated with the public right-of-way, including the street miles available for assessment (i.e., those associated with VH, H, or M trash generation areas not treated by full capture systems), the street miles assessed, the % of available street miles assessed, and the average number of assessments conducted per site within the TMA; and
- 2) Percent jurisdictional-wide trash reduction in FY 24-25 attributable to trash management actions other than full capture systems that have been implemented to address trash generation associated with the public right-of-way in each TMA; OR
- 3) Indicate that no on-land visual assessments were performed.

If no on-land visual assessments were performed in a TMA, check here **and state why:**

X

Explanation: No OVTAs were conducted in TMAs 9 and 10 because there are no available street miles for assessments. TMA 9 only has low trash generating areas, as depicted on the City's baseline trash generation map. No OVTAs were conducted in TMA 10 because the entire TMA is comprised of PLDAs. The trash load reduction for this TMA is included in table C.10.a.ii(b).

TMA ID or (as applicable) Control Measure Area	Total Street Miles ⁷ Available for Assessment	Summary of On-land Visual Assessments			Jurisdictional-wide Reduction (%)
		Street Miles Assessed	% of Available Street Miles Assessed	Avg. # of Assessments Conducted at Each Site	
1	0.3	0.3	100%	4.0	15.9%
2	0.1	0.1	100%	5.0	0.3%
3	0.3	0.1	41%	6.0	0.7%
4	1.8	0.2	11%	4.0	2.4%
5	0.9	0.2	22%	5.0	0.8%
7	1.0	0.2	22%	6.0	1.3%
8	0.2	0.1	43%	4.0	0.4%
9	0.0	-	-	-	-
10	0.0	-	-	-	-
Total		1.2	-	-	21.8%⁸

⁷ Street miles are defined as the street length and do not include street median curbs.

⁸ Percent trash load reduction reported here does not include load reductions associated with the City's Trash Inspection Program on PLDAs.

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

Provide descriptions of significant revisions made to your Long-term Trash Load Reduction Plan submitted to the Water Board in February 2014 or (if applicable) to your Updated Long-term Trash Load Reduction Plan submitted in 2023 in response to the 90% benchmark. Describe significant changes made to trash management areas (TMA), baseline trash generation maps, control measures, or time schedules identified in your plan. Indicate whether your baseline trash generation map was revised and, if so, what information was collected to support the revision. If your baseline trash generation map was revised, attach it to your Annual Report and/or provide a link to your map.

Description of Significant Revision	Associated TMA
In FY 19-20, the City refined its Baseline Trash Generation Map based on new information on the levels of trash generated on private lands that drain to inlets located on those properties, but are connected to the City's MS4. In FY 17-18, a total of 528 acres of land area were identified by the City as draining to inlets located on private lands and potentially generating low levels of trash. The process followed to identify these areas was described in the City's FY 17-18 Annual Report and was conducted to address MRP Permit Provision C.10.a.ii.b (Trash Generation Area Management - Identification of Private Drainages >10,000ft²). Maps identifying 528 acres of land area were submitted to the San Francisco Bay Regional Water Quality Control Board (Water Board) in September 2018 with the City's FY 17-18 Annual Report. To gain additional information of the baseline trash levels on these land areas, the City conducted On-land Visual Trash Assessments (OVTAs) in FY 19-20 on parcels that comprised the 528 acres. These parcels had not been assessed during the initial development of the City's baseline map, so the OVTAs conducted in FY 19-20 were the first time these parcels were evaluated for trash generation levels. Two field-based OVTAs using OVTA Protocol C – Area-based Survey (EOA 2018) were conducted for each parcel to confirm parcel accessibility, existence of an inlet, and current trash generation levels. Based on previous technical studies (BASMAA 2017), two assessments events with "A" OVTA scores are needed to identify a parcel as "Low trash generating." If the first assessment event yielded an OVTA score other than an "A", the second assessment event was canceled. Two consultant staff trained in Protocol C conducted all OVTAs. To the extent possible, assessments were performed directly prior to reoccurring trash control measures on parcels to depict maximum trash generation levels. Based on the results of the OVTAs, 322 of the 528 acres of original were reclassified as "low trash generation" on the City's Baseline Trash Generation Map. The pdf version of the City's map can be downloaded at http://scvurppp.org/trash-maps/	All TMAs
In FY 21-22, the City conducted a thorough evaluation of its baseline trash generation map, treatment areas for existing trash full capture systems, and identified which multi-beneficial (bioretention) treatment facilities installed in the City meet the trash full capture design standard, as described in the MRP. The City's 2009 baseline trash generation map was reevaluated to ensure that jurisdictional areas draining to the City's MS4 are included on the map and that these areas were assigned the appropriate trash generation category when the original baseline map was created. Based on the findings of this evaluation, the City's baseline map was refined and now provides a much more accurate illustration of both its jurisdictional areas and the associated baseline level of trash that was generated on these areas in 2009. The areas treated by existing trash full capture systems were also evaluated and refined based on more accurate information on drainage patterns and the configuration of the City's MS4. These refined treatment area boundaries provide a much more accurate illustration of the land areas draining to these full capture systems. Lastly, in FY 21-22 the City began to identify which existing multi-beneficial (bioretention)	All TMAs

treatment facilities achieve the trash full capture design standard, as described in the MRP and the State Water Resources Control Board fact sheets on multi- beneficial full capture systems. A technical memorandum describing the analysis conducted by the Santa Clara Valley Urban Runoff Program (SCVURPPP) that supports the criteria used to identify the applicable bioretention facilities is included in the SCVRUPPP FY 21-22 Annual Report (Section 10). The City's Long-term Trash Load Reduction Plan was updated with these refined jurisdictional areas and full capture treatment drainage boundaries and refined baseline trash generation levels, which are included in Appendix 10-1 of this report.	
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C.10.b.v ► Trash Reduction – Source Controls

Provide a description of each jurisdiction-wide trash source control action implemented to date other than those addressed under previous Permits (i.e., foam foodware and single-use plastic bags). For each new control action, identify the trash reduction evaluation method(s) used to demonstrate on-going reductions, summarize the results of the evaluation(s), and estimate the associated reduction of trash within your jurisdictional area. Note: There is a maximum of 10% total credit for source controls.

Source Control Action	Summary Description & Dominant Trash Sources and Types Targeted	Evaluation/Enforcement Method(s)	Summary of Evaluation/Enforcement Results To-date	% Reduction
N/A	N/A – the City has single-use foodware and bag regulations, but has elected not to take this offset	N/A	N/A	N/A

C.10.f.i ► Trash Reduction Offsets – Creek and Shoreline Cleanups

Provide a summary description of creek and shoreline cleanups conducted during FY 24-25 and the water quality benefit achieved. Include information that is sufficient to demonstrate sustained improvement of the creek or shoreline area, the volume of trash removed, and the offset claimed in FY 24-25. Provide the number and frequency of cleanups conducted, locations and cleanup dates.

Offset Program	Summary Description of Cleanup Actions and the Benefit of Water Quality Achieved	Volume of Trash (CY) Removed/Controlled in FY 24-25	Offset (% Jurisdiction-wide Reduction)
Additional Creek and Shoreline Cleanups (Max 10% Offset)	N/A - the City conducts creek cleanups but has elected not to take this offset	N/A	N/A

C.10.f.ii ► Trash Reduction Offsets – Direct Trash Discharge Controls

For those Permittees with a DDCP approved by the Water Board Executive Officer, provide a summary description of the trash controls implemented, the volume of trash removed via the DDCP, and the offset claimed in FY 24-25. Attach a report that includes the following:

- For Permittees whose DDCPs address significant discharges from unsheltered homeless populations, include a narrative description and quantitative information for the following for FY 24-25 and for each prior year of the permit term:
 - o The estimated number of people experiencing unsheltered homelessness in their jurisdiction;
 - o the estimated number of people experiencing unsheltered homelessness living within approximately 500 feet of receiving waters;
 - o the estimated portion of those populations provided housing as described in Provision C.10.f.ii.b.(i);
 - o the estimated portion of those populations served with the services described in Provision C.10.f.ii.b.(i);
 - o the number and scope of sanitation controls and services provided to homeless encampments;
 - o the number and scope of trash controls and services provided to homeless encampments; and
 - o the number and scope of sanitary cleanouts and other services provided to RVs.
- For Permittees whose DDCPs address significant discharges from illegal dumping sites, include a narrative description and quantitative information for the following for FY 24-25 and for each prior year of the permit term:
 - o The total number of active illegal dumping sites;
 - o the number of active illegal dumping sites within approximately 500 feet of receiving waters;
 - o the number of illegal dumping sites where trash was collected, and the amount of material collected;
 - o dumping vouchers (or equivalent) provided (and who they are provided to);
 - o dumping vouchers (or equivalent) used; and
 - o outreach and education provided to the public regarding illegal dumping and the availability of dumping vouchers (or equivalent).
- For Permittees whose DDCPs address significant discharges from both unsheltered homeless populations and illegal dumping sites, include a narrative description and quantitative information for all the elements listed above for the FY 24-25 and for each prior year of the permit term.

Offset Program	Summary Description of Actions and Assessment Results	Volume of Trash (CY) Removed/Controlled in FY 24-25	Offset (% Jurisdiction-wide Reduction)
Direct Trash Discharge Controls (Max 15% Offset)	N/A	N/A	N/A

Appendix 10-1. Baseline trash generation and areas addressed by full capture systems and other control measures in Fiscal Year 24-25⁹.

TMA	2009 Baseline Trash Generation ¹⁰ (Acres)					Trash Generation (Acres) in FY 24-25 After Accounting for Full Capture Systems					Jurisdiction- wide Reduction via Full Capture Systems (%)	Trash Generation (Acres) in FY 24-25 After Accounting for Full Capture Systems <u>and</u> Other Control Measures ¹¹					Jurisdiction- wide Reduction via Other Control Measures (%) ¹¹	Jurisdiction-wide Reduction via Full Capture <u>AND</u> Other Control Measures (%)
	L	M	H	VH	Total	L	M	H	VH	Total		L	M	H	VH	Total		
1	71	32	73	-	175	124	5	47	-	175	10.8%	175	-	-	-	175	15.9%	26.7%
2	13	-	66	-	79	79	-	1	-	79	21.7%	79	-	-	-	79	0.3%	21.9%
3	114	9	11	-	134	130	3	1	-	134	3.8%	134	-	-	-	134	0.7%	4.4%
4	163	138	1	-	302	273	29	-	-	302	9.4%	302	-	-	-	302	2.4%	11.9%
5	130	30	1	-	161	152	9	-	-	161	1.9%	161	-	-	-	161	0.8%	2.7%
7	201	30	-	-	231	216	15	-	-	231	1.2%	231	-	-	-	231	1.3%	2.5%
8	190	41	-	-	231	226	5	-	-	231	3.0%	231	-	-	-	231	0.4%	3.4%
9	5206	3	-	-	5209	5209	-	-	-	5209	0.2%	5209	-	-	-	5209	0.0%	0.2%
10 ¹²	7	28	72	-	107	20	28	59	-	107	4.3%	107	-	-	-	107	21.8%	26.1%
Totals	6095	312	224	-	6631	6429	93	108	-	6631	56.4%	6631	-	-	-	6631	43.6% ¹³	100.0%

⁹ Due to rounding, total acres and percentages presented in this table may be slightly different than the sum of the acres/percentages in the corresponding rows/columns.

¹⁰ 2009 baseline trash generation (acres) incorporates any refinements made subsequent to 2009 to baseline based on new and more accurate information.

¹¹ Acreage changes and percent reductions reported here include those associated with other trash controls implemented to address moderate, high or very high trash generating areas in the public right-of-way and on applicable private lands.

¹² This TMA was added in FY 24-25 and includes all PLDAs in the City. The land area included in this TMA was removed from other TMAs.

¹³ This load reduction includes 21.8% associated with the City's TIP for PLDAs and 21.8% associated with other trash control measures (as observed by OVTAs).

Section 11 – Provision C.11 Mercury Controls

C.11.a ► Assess Mercury Load Reductions from Stormwater

Submit documentation confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.11.b.iii (1), (2) ► Program for Source Property Identification and Abatement

Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of old industrial land uses. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement). Permittees shall submit all supporting data and information including referral reports.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

Report on ongoing O&M activities associated with all past contaminated property referrals. Prior to all new referrals, Permittees shall submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.11.c.iii (2) ► Program for Control Measure Implementation in Old Industrial Areas

Submit an account of control measure and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.11.d.iii (1) ► Mercury Collection and Recycling Implemented throughout the Region

Report on efforts to promote recycling of mercury-containing products and efforts to increase effectiveness of those recycling efforts. Report on the mass of mercury-containing material collected throughout the region along with an estimate of the mass of mercury contained in recycled material using the methodology contained in load reduction accounting system described and cited in the Fact Sheet.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the Program's FY 24-25 Annual Report.

C.11.h ► Implement a Risk Reduction Program

Report on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.

A summary of Program and regional accomplishments for this sub-provision, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish, is included in SCVURPPP's FY 24-25 Annual Report.

Cupertino utilizes the Santa Clara County Household Hazardous Waste (HHW) Program for its residents to safely dispose of HHW including mercury-containing products. In FY 24-25, the County's HHW Program served a total of 46,118 Santa Clara County residents and collected a total of 2,911,307 pounds of hazardous waste which was managed safely and legally. In addition, the County's CESQG program served 310 small business drop-offs including local governments and community donation centers such as Goodwill Industries and the Salvation Army. The CESQG program brochure is also mailed out to Cupertino businesses with the annual IND letters and distributed as needed during the IND inspections. These brochures are provided to identify a resource for mercury-containing universal waste disposal options that small business owners may not know is available to them at a very low cost. Mercury-containing products collected through the County's HHW collection program in FY 24-25 included:

- Total fluorescent lamps collected – 74,362 pounds
- Total household batteries collected – 209,663 pounds

- Elemental Mercury - 214 pounds (includes thermostats, thermometers, and other products)

The City's franchised waste hauler, Recology, also offers residents options to dispose of mercury containing products. Cupertino residents are encouraged to place household batteries and CFLs in a clear, sealed plastic bag on top of their curbside recycling containers for pickup on their regularly scheduled waste and recycling collection day. In addition, the City and Recology also annually host quarterly free Universal waste drop-off events at De Anza College in Cupertino to encourage residents to drop-off mercury-containing used fluorescent bulbs, U-Waste, and E-Waste for recycling. All four events were held in FY 24-25. Mercury-containing products collected through these City coordinated services include:

- Total fluorescent lamps collected: 1,381 pounds
- Total household batteries collected: 19,152 pounds
- Total E-Waste collected: 49,004 pounds

FY 24-25 Event Dates

Saturday, September 21, 2024 | 08:00 AM - 12:00 PM

Saturday, November 16, 2024 | 08:00 AM - 12:00 PM

Saturday, January 18, 2025 | 08:00 AM - 12:00 PM

Saturday, April 26, 2025 | 08:00 AM - 12:00 PM

Section 12 – Provision C.12 PCBs Controls

C.12.a.iii.(1) ► Assess PCBs Load Reductions from Stormwater

Submit documentation confirming that all control measures effectuated during the previous Permit term for which load reduction credit was recognized continue to be implemented at an intensity sufficient to maintain the credited load reduction.

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.b.iii.(1), (2) ► Program for Source Property Identification and Abatement

C.12.b.iii.(1). Report progress on the acreage of land areas investigated, including progress toward investigation of 100 percent of old industrial land uses. The reporting shall indicate what action was taken for the parcels investigated (e.g., abatement, referral, enforcement). Permittees shall submit all supporting data and information including referral reports.

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.b.iii.(2). Report on ongoing O&M activities associated with all past contaminated property referrals. Prior to all new referrals, Permittees shall submit, for staff review and comment, a detailed description of the enhanced O&M plan for the referred properties.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.c.iii.(2) ► Program for Control Measure Implementation in Old Industrial Areas

Submit an account of control measures and stormwater diversion implementation consistent with the plan submitted in March 2023 and any modifications thereto. Include maps of the areas treated, the acreage of catchments addressed, and a description of all control measures, installed treatment devices and routing facilities for each treated catchment.

Summary:

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.d.iii.(1), (3) ► Program for Controlling PCBs from Bridges and Overpasses

C.12.d.iii.(1). In the 2022 Annual Report or the Annual Report immediately following availability of the specification, include a description of the Caltrans specification for managing PCBs-containing materials in bridge or roadway expansion joints during roadway replacement or repair.

Summary:

The Caltrans specification was not available to be implemented during FY 24-25. See Section 11 of the SCVURPPP FY 24-25 Annual Report for a description of the proposed method to address PCBs in bridges and overpasses in the absence of a Caltrans specification.

C.12.d.iii.(3). Submit documentation confirming the use of the Caltrans specification (once it is available) during all instances of bridge roadway replacement or repair in their jurisdiction during the reporting year and provide an estimate of the volume of material managed and total PCBs mass load reduced resulting from implementation of the specification.

Summary:

The Caltrans specification was not available to be implemented during FY 24-25.

C.12.e.iii.(4) ► Program for Controlling PCBs from Electrical Utilities

[Note: Applicable only to municipalities that own electrical utilities]

Does your municipality own an electrical utility? If yes, follow the directions below.

	Yes	X	No
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C.12.e.iii.(4). Submit a summary of the actions undertaken during FY 24-25 that remove municipally owned PCBs-containing OFEE along with loads avoided and the details of the calculations and assumptions used to estimate the load reduced.

Summary:

Guidance:

We do not own an electrical utility.

C.12.g.iii.(1), (3), (4) ► Manage PCB-Containing Materials and Wastes During Building Demolition Activities

C.12.g.iii.(1). Did your agency obtain an exemption in FY 22-23 from Provision C.12.g requirements? If Yes, skip the remainder of this C.12.g section.

Yes

X

No

C.12.g.iii.(3)(a),(b),(c) and (d). Provide the following:

- (a) The number of applicable structures that applied for a demolition permit during the reporting year;
- (b) A running list of the applicable structures that applied for a demolition permit since July 1, 2019, the number of samples each structure collected, and the concentration of PCBs in each sample;
- (c) The project address, the demolition date, and a brief description of the PCBs-containing materials for each applicable structure with a PCBs concentration 50 mg/kg or greater; and
- (d) The address, date building was constructed, and date of demolition for each structure that was constructed or remodeled between the years 1950 and 1980 and requires emergency demolition to protect public health and/or safety.

See the SCVURPPP Mercury and PCBs Control Measures Report in Appendix 11-1 of the SCVURPPP FY 24-25 Annual Report.

C.12.g.iii.(4). For active demolition sites in FY 24-25 with structures with PCBs concentrations ≥ 50 ppm, list the project address and demolition date, describe the PCBs-containing materials, state whether the site was inspected during demolition, and provide the hazardous waste manifest prepared for transportation of material to a disposal facility for those cases where notification and advance approval from U.S. EPA is not required and were approved for demolition after June 30, 2023.

Do not leave any cells blank.

Site Address	Was this site inspected during demolition? (Yes/No)	If this site was approved for demolition after June 30, 2023 and did not require notification to and advanced approval from EPA, attach the hazardous waste manifest and indicate it is attached.
N/A	N/A	N/A

C.12.j.iii. ► Implement a Risk Reduction Program

Report on the status of the risk reduction program, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish.

A summary of Program and regional accomplishments for this sub-provision, including a brief description of actions taken, an estimate of the number of people reached, and why these people are deemed likely to consume Bay fish, is included in the Program's FY 24-25 Annual Report.

Section 13 – Provision C.13 Copper Controls

C.13.a.iii (3) ► Manage Waste Generated from Cleaning and Treating of Copper Architectural Features

Provide summaries of permitting and enforcement activities to manage waste generated from cleaning and treating of copper architectural features, including copper roofs, during construction and post-construction.

Summary:

The City has a municipal code prohibition against copper roofing materials and ornamental copper for exterior use where oxidation and runoff may occur. New construction and remodeling plan review staff in the Planning, Building, Public Works Development, and Environmental Programs Divisions are all trained in the municipal code prohibition of architectural copper applications. The City developed standard Conditions of Approval (COA) specifically prohibiting the installation and use of copper roofs, gutters, downspouts, and other architectural features. Project applicants are provided with the COA and must sign their acknowledgement of the copper restrictions. These requirements pertain to both residential and non-residential projects being reviewed. In cases where copper was installed prior to municipal code or MRP regulation, the City works with the property owner to remove or replace the copper with an alternative material. If that cannot be accomplished, the City requires the copper to be properly coated and sealed to ensure the copper is appropriately weatherized to prohibit discharging during rain events. Installation of drainage from copper materials to a stormwater treatment facility such as an infiltration device/structure is also considered as a potential method of mitigation.

C.13.b.iii (3) ► Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals

Provide summaries of any enforcement activities related to copper-containing discharges from pools, spas, and fountains.

Summary:

In FY 24-25, there were zero reported IDDE discharges of pool, spa, or fountain water.

C.13.c.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 of Cupertino does not currently have industries such as electroplating, semiconductor manufacturing, or metal finishing which all possess the potential for copper related discharges through their operations. Through the IND program, all business facilities inspected have roof downspout discharge areas inspected for any copper depositions that would indicate rain, dense water vapor (fog) or HVAC condensate are discharging copper leachate from rooftop equipment. Of all facilities inspected through the IND program in FY 24-25, there were no copper discharges identified from rooftop equipment.

Section 14 – Provision C.14 Bacteria Control for Impaired Water Bodies

C.14.a.i. Municipal Operations Bacteria Control

Describe the BMPs, frequency and location for actions taken to reduce bacteria sources related to municipal operations.

Does not apply to City of Cupertino.

C.14.a.ii. Industrial/Commercial Site Bacteria Control and Illicit Discharge Detection and Elimination

Describe the BMPs, frequency, and location for actions taken to reduce bacteria sources related to Industrial and Commercial Site Bacteria Control and Illicit Discharge Detection and Elimination.

Does not apply to City of Cupertino.

C.14.a.iii. ► Control of Bacteria Sources Related to Unsheltered Homeless Populations

Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria discharges from areas inhabited by unsheltered persons

Does not apply to City of Cupertino.

C.14.a. iv. Pet and Livestock Bacteria Source Control

Describe the BMPs, numbers or frequency (as applicable), and locations of actions taken to reduce bacteria from domestic animal sources.

Does not apply to City of Cupertino.

C.14.a.v. Public Outreach on Bacteria Source Control

Describe the outreach messages, methods of delivery, audiences, and number of repetitions.

Does not apply to City of Cupertino.

C.14.a.vi. ► Coordination with Sanitary Sewerage System Entities

Describe the status of any actions taken to coordinate with sanitary sewer entities.

Does not apply to City of Cupertino.

C.14.a.vii. ► Prioritize Trash Removal to Control Bacteria Sources

Describe how the bacteria-reduction benefit of focused trash-control efforts was evaluated, the conclusions reached, and any actions taken during the reporting period to reprioritize trash control areas.

Does not apply to City of Cupertino.

C.14.a.viii. ► Water Quality Monitoring

Submit the results of all monitoring conducted the previous year, including parameters analyzed, frequencies, and locations, and planned monitoring for the current year, including parameters, frequencies, and locations.

Does not apply to City of Cupertino.

C.14.c.i.(3) ► Control Measures to Achieve Indicator Bacteria Wasteload Allocations

Summarize the actions taken to satisfy the requirements in Provision C.14.c.i.(2) between October 1, 2023 and September 30, 2024. This report shall include:

- (a) The number, type, and locations and/or frequency (if applicable) of control measures;
- (b) The description and scope of pollution prevention measures; and
- (c) A data table and graphs showing *Enterococcus* data collected during the reporting year for the two San Mateo Lagoon beaches, Parkside Aquatic Park Beach and Lakeshore Park Beach.

Not applicable.

C.14.c.ii.(3) ► Phase Two Measures

Summarize the actions taken to satisfy the requirements in Provision C.14.c.ii.(2) between October 1, 2023 and September 30, 2024. This report shall include:

- (a) The number, type, and locations and/or frequency (if applicable) of control measures;
- (b) The description and scope of pollution prevention measures; and
- (c) A data table and graphs showing *Enterococcus* data collected during the reporting year for the two San Mateo Lagoon beaches, Parkside Aquatic Park Beach and Lakeshore Park Beach.

Not applicable.

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

C.15.b.iii.(2)(b), (3)(e) ► Emergency Discharges of Fire Fighting Water and Foam
<i>(For FY 24-25 Annual Report only)</i> C.15.b.iii.(2)(b): Collectively submit a Firefighting Discharges Report by September 30, 2025, that describes progress on, and recommendations regarding, the implementation of the items listed in Provision C.15.b.iii.(2)(a)(i)-(vii).
Summary: See the Regional BMP Report submitted by BAMSC on behalf of all MRP Permittees to the Water Board Executive Officer and included in Appendix 13-1 of the SCVURPPP FY 24-25 Annual Report.
C.15.b.iii.(3)(e): Annually report on the following ongoing practices: • Ensuring proper BMPs and SOPs are included in contracts for non-municipal (contracted) staff hired by Permittees to assist with containment and cleanup, and to assist with prevention and mitigation of adverse impacts, of discharges associated with firefighting emergencies; and • Evaluating the adequacy of large industrial sites' BMPs and SOPs for the prevention, containment and cleanup of emergency firefighting discharges into storm drains and receiving waters within Permittees' jurisdictions and cause those BMPs and SOPs to be improved as appropriate.
Summary: Efforts are underway to address these two tasks in the BAMSC Regional Firefighting Discharges Work Group and the SCVURPPP IND/IDDE AHTG. A BMP fact sheet for Fire Restoration Contractors has been reviewed and when finalized it will be distributed regionally. A BMP fact sheet for sites that are prone to firefighting emergencies has been reviewed and will be distributed to sites prone to fire emergencies as identified by the Santa Clara County Fire Department. Contacts have been identified with the Santa Clara County Fire Department to collaborate on distributing BMP fact sheets and implement the recommendations in the Fire Discharges Report. An initial meeting is scheduled for Fall to determine procedures for communication and mitigation of impacts from emergency fire events. The City has determined that there are no large industrial sites within its jurisdiction that require fire response BMPs and SOPs to be evaluated and improved.

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:

Promotion of Conservation Programs

The City continues its partnership with Grassroots Ecology (Acterra) and the City's Naturalist to promote several volunteer-based conservation programs. Volunteers spend their time at two City facilities along Stevens Creek (Blackberry Farm Recreational Area and McClellan Ranch Preserve) removing invasive vegetation and re-planting native plants. Volunteers add mulch to the landscape to prevent pests and invasive weeds. Native plant seeds are collected during these events for later use. The goal of these projects is to improve the habitats for local wildlife and conserve native vegetation.

Promotion of Outreach for Less Toxic Pest Control and Landscape Management

Cupertino is one of many Santa Clara County jurisdictions that participate in and promotes the My Watershed Watch educational campaign. The purpose of My Watershed Watch is to create public awareness on water pollution prevention by informing the public how typical everyday activities can lead to water pollution and what can be done to prevent it. Cupertino promotes many of My Watershed Watch outreach materials such as Less-Toxic Pest Control for Multi-Unit Properties, Trash Resources & Pathways to Urban Creeks, 10 Most Wanted Bugs and many other less-toxic pest control related materials during events and in displays at the Senior Center, City Hall, and Quinlan Community Center. Each year at the City's annual IPM meeting, the City's facilities pest control contractor and golf course superintendent contractor sign and agree to follow the City's Integrated Pest Management Policy. The City's Arborist, the Public Works Grounds Supervisor, and the Parks Supervisor all practice IPM techniques. The annual meeting this year was done one-on-one, where the Environmental Compliance Technician conversed with each pesticide applicator to discuss practices that worked over the past year and the IPM methods they used this year and methods they would like to try in the upcoming years. This commitment to use natural pest control methods, pesticides only as a last resort, and least-toxic pest control available, serves as the basis of the City's IPM policy. City Public Works staff and the two contractors also participate in several pest control trainings held by the County, the City, and other organizations.

Rainwater Capture Rebate Program

The City was using a portion of the Clean Water and Storm Protection fee moneys to match rebates by Valley Water for installation of rain barrels, cisterns, rain gardens, and drought tolerant landscape conversion. Due to budget constraints, this matching program ended effective 6/30/25.

Composting

The City of Cupertino offers free bulk compost to all Cupertino residents at three different sites: Stevens Creek Quarry, Sunnyvale's SMaRT station, and Sunnyvale's Charles Street Garden. The compost is made from residential food scraps and yard waste collected from either Sunnyvale or Cupertino's organics recycling program. Between March and October, the City provides free compost to residents on Friday and Saturday mornings from 8:00 a.m. to noon. Cupertino residents are offered OMRI certified compost for their home gardening use. Compost helps reduce the amount of chemical pesticides needed for residential landscaping and maintains moisture leading to less watering and potentially less run-off from overwatering. Residents also have the opportunity to attend free home composting workshops hosted by the County. After attending a workshop, Cupertino residents qualify for a free home composting bin from the City to create their own compost generated from yard trimmings and food scraps.

Promotion of Drought Tolerant and Native Vegetation

The City of Cupertino encourages its residents to plant drought tolerant vegetation by promoting Valley Water's) Landscape Rebate Program on the City website and at local events.

Promotion of Water Conservation

The City promotes many water conservation programs, including "Graywater, Laundry to Landscape", in-line drip line irrigation, lawn conversion, and rainwater harvesting on our website.

Enforcement Response Plan for irrigation runoff

The City does not permit non-stormwater discharges to enter the storm drain system, including large volume landscape irrigation runoff. The municipal code regulates landscape irrigation runoff and enforcement is conducted through the City's IDDE program. Discharging high volume landscape irrigation runoff is a violation for the water discharge and includes scouring and sediment that transport nutrients and other POCs found in roadways and other hardscaped areas to the storm drain system. IDDE inspectors pursue resolution of the discharge with the property owners and property managers in both residential and commercial settings consistent with the IND/IDDE Enforcement Response Plan. These discharges are tracked in the IDDE database. In addition to the discharge violation for irrigation runoff, property owners/managers are also educated on water conservation best practices. An educational door hanger is used for incidents of smaller, residential landscape overspray where water is observed in the gutter, but the specific source of the discharge is not able to be positively identified for direct follow up. Door hangers are left by the IND/IDDE inspector at residences in the vicinity of the wet gutter.

Section 17 – Provision C.17 Discharges Associated with Unsheltered Homeless Populations

C.17.a.iii.(2) ► BMP Implementation and Effectiveness Evaluation

(For FY 24-25 Annual Report) Submit a map identifying the approximate location(s) of unsheltered homeless populations within your jurisdiction, including homeless encampments and other areas where other unsheltered homeless people live.

Summary:

A map showing the count of unsheltered populations by census tracts in relation to storm drain inlets and existing streams, rivers, flood control channels, and other surface water bodies within our jurisdiction is included in Appendix 17-1. The map was developed using the 2025 point-in-time survey count data provided by the County of Santa Clara. Due to privacy and safety concerns, the County did not provide location data below the census tract level for this publicly available report.

The point-in-time survey count reflects the on-the-ground reality of the few days the count was done. The maps aren't designed or meant to be an accurate real-time count of the total number of people experiencing homelessness and where they are, as the unhoused community frequently moves, shrinks as people connect to housing services, and grows if others fall into the homelessness experience.

(For FY 24-25 Annual Report) Report on the best management practices being implemented and include the effectiveness evaluation reporting required in Provision C.17.a.ii.(3) and additional actions or changes to existing actions that the Permittee will implement to improve existing practices.

Summary:

As estimated by the Santa Clara County 2025 Point-in-Time (PIT) count, the City of Cupertino has a total unsheltered population of roughly 51. This number includes a count of unsheltered homeless sleeping outdoors on the street, at bus and train stations, in parks, tents, and other make-shift shelters, and in vehicles and abandoned properties. At the time the 2025 PIT count was conducted, these unsheltered individuals were observed in the following census tracts within the city boundary– 5077.02, 5077.01, 5077.04, 5077.08, 5078.06, 5078.07, 5078.08, 5080.03, 5080.04, 5080.05, 5080.06, 5081.01 and, 5081.02. These census tracts include areas (e.g., city streets, parks) that are under city jurisdiction, and other areas (e.g., freeways, expressways, creeks) that are not under city jurisdiction. We coordinate internally with the Community Development Department and with the County of Santa Clara Office of Supportive Housing (OSH) to provide BMPs and support services to unsheltered populations located within city jurisdiction. For unsheltered populations located in areas that are not under city jurisdiction, staff inform the agency that has jurisdiction over the area when unsheltered populations are observed.

The City of Cupertino implements the following best management practices (BMPs) and programmatic efforts to address non-stormwater discharges from unsheltered populations located within our jurisdiction.

BMP/Programmatic Effort	Effectiveness Evaluation	Changes Planned
<u>Trash collection and disposal</u> - City provides dumpsters/trash cans at encampments. In addition, public trash cans are available at all parks and downtown areas.	Public trash cans are routinely emptied, and staff did not capture quantitative data of pounds of trash collected from encampments. Trash receptacles were provided by the City through the waste hauler but in general, they were not fully utilized.	No changes are currently planned. The City currently has a small number of encampments and they are monitored by OSH and the City IDDE inspector. If trash accumulation is observed, receptacles may be provided.
<u>Encampment cleanups</u> – the City conducts homeless encampment cleanups only as a last resort and conforming with all State and Federal laws. When cleanups are conducted, Tucker Construction is under a master service agreement to perform the work with assistance from OSH, the Santa Clara County Sheriff's Office, Code Enforcement, and the IDDE inspector.	In FY 24-25 the City conducted 3 cleanups. The weight of trash was not obtained, and material left behind after relocation was stored in accordance with State and Federal law.	Staff plan to continue conducting trash cleanups as needed.
<u>Portable toilets and handwashing stations</u> - Staff provide portable toilets and handwashing stations at encampments as needed.	Currently Cupertino is not providing portable toilets/handwashing stations at any locations. City is not able to provide these facilities at all locations due to site/space constraints, vandalism, etc.	City plans to continue to offer this BMP as needed.
<u>Coordination with OSH</u> – City staff coordinate with OSH and the Continuum of Care (CoC) Program to provide housing to unsheltered individuals. Staff have a process in place to refer unsheltered populations to the County's supportive housing system.	The Community Development Department's Senior Housing Coordinator continues to work with OSH on an as-needed basis.	No changes planned.

FY 24-25 Annual Report
Permittee Name: City of Cupertino

C.17 – Unsheltered Homeless Populations

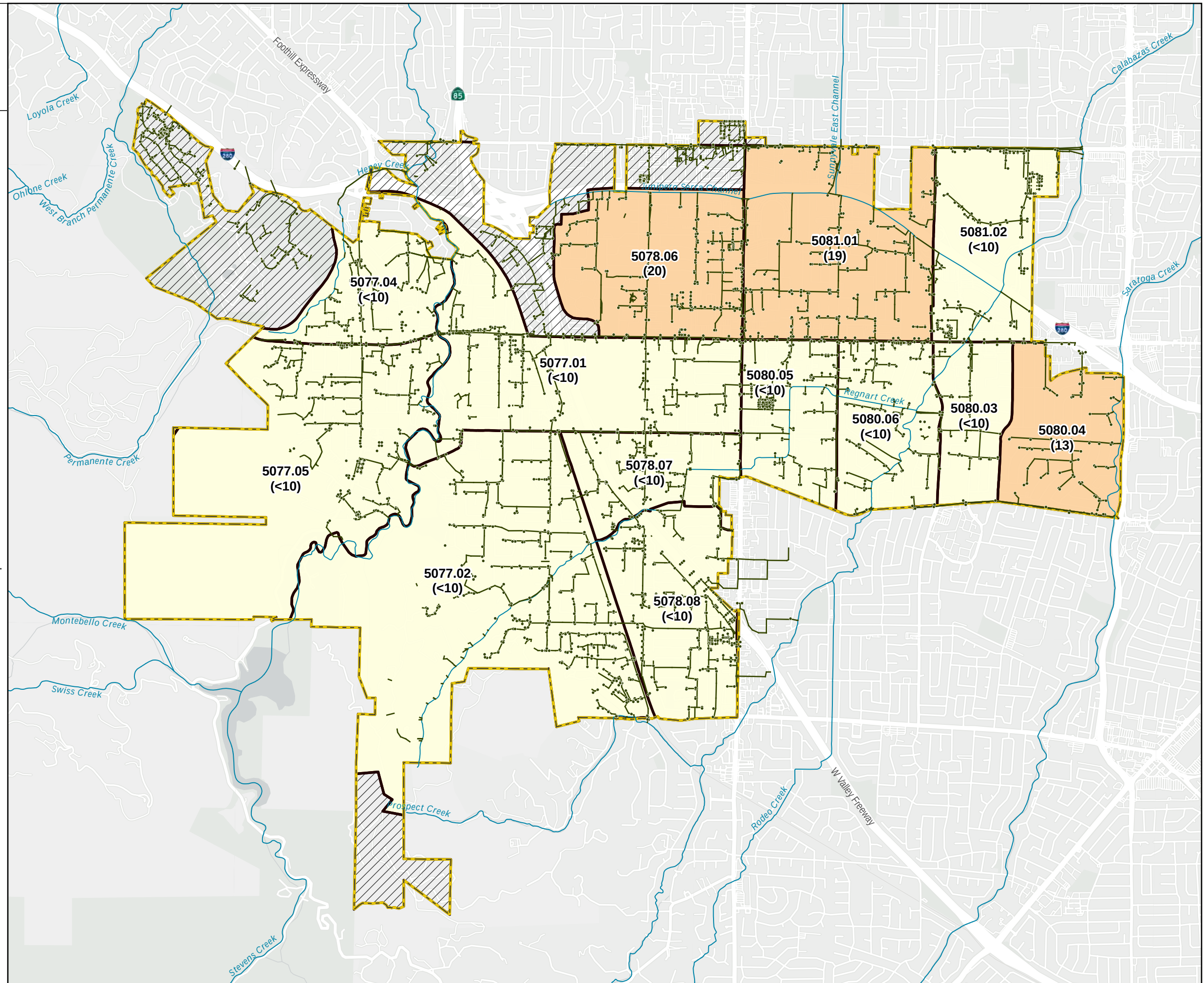
BMP/Programmatic Effort	Effectiveness Evaluation	Changes Planned
<u>Funding Initiatives</u> - We use funds from the following sources to provide supportive services: • Community Development Block Grants • Human Services Grant	• \$37,200 to the West Valley Community Services CARE program • \$100,000 to the West Valley Community Services Haven to Home program • \$25,000 per year to the Maitri Domestic Violence Shelter • \$25,000 per year to the Rotating Safe Car Park Program	In the future, the City plans to leverage the Permanent Local Housing Allocation fund to expand supportive services to address and prevent homelessness.
<u>Coordination with Non-profit organizations</u> - City provides funding to the following non-profits for providing supportive services to unsheltered populations: • Habitat for Humanity • West Valley Community Services • Haven to Home • MATRI • Project Sentinel	City staff provided the following services to unsheltered individuals in partnership with local non-profits • Referred individuals/families to housing and other supportive services • Referred individuals to housing resources	Staff will continue to partner with local non-profits to offer services to unsheltered homeless populations.
<u>Internal Coordination</u> - Stormwater staff coordinate efforts with the following departments to inform other staff about stormwater requirements and BMPs that help reduce stormwater discharges from unsheltered populations and offer support services to unsheltered populations: • City Manager's Office • Police Department • Social services • Housing	Internal coordination will continue on an as needed basis.	Staff will continue to coordinate with other departments to offer support services to unsheltered individuals.

September 2025

- ## Unsheltered Population Count by Census Tract, with Census Tract ID

Notes

6. Basemap source: ESRI



Census Tract	Area in Acres	Area in Square Miles	Unsheltered Population Count	Unsheltered Density (Count/Square Mile)
5078.06	465	0.73	19.5	26.8
5081.01	613	0.96	18.6	19.4
5080.04	305	0.48	13.2	27.7
5080.06	300	0.47	0 to 10	-
5080.05	260	0.41	0 to 10	-
5080.03	196	0.31	0 to 10	-
5077.05	999	1.56	0 to 10	-
5077.04	259	0.40	0 to 10	-
5077.01	653	1.02	0 to 10	-
5077.02	1,244	1.94	0 to 10	-
5081.02	363	0.57	0 to 10	-
5078.07	231	0.36	0 to 10	-
5078.08	400	0.62	0 to 10	-

Section 20 - Provision C.20 Cost Reporting

C.20.c ► Reporting				
Did your agency complete a fiscal analysis of the costs incurred to comply with MRP requirements during FY 24-25 according to the accepted Bay Area cost reporting framework and methodology?	X	Yes, see attached FY 24-25 Cost Report		No
If No, provide schedule for completion:				

FY 24-25 CITY OF CUPERTINO ANNUAL REPORT

Submittal of Annual Cost Analysis

As a part of the FY 24-25 Annual Report, City of Cupertino has prepared and submitted a fiscal analysis of the costs incurred to comply with the Municipal Regional Stormwater Permit, Order No. R2-2022-0018 (MRP 3.0), Provision C.20 Cost Reporting. The fiscal analysis is consistent with the Cost Reporting Framework and Guidance Manual that was developed for the San Francisco Bay region by the Bay Area Municipal Stormwater (BAMS) Collaborative and includes the following:

- **Cost Reporting Summary** – Estimated personnel and overhead costs, external professional services costs, capital expenditures, and operation and maintenance costs by program area (program management and MRP provision) for the current reporting fiscal year and estimated expenditures for the next reporting fiscal year; and
- **Source of Funds Summary** - Source of funds for the current reporting fiscal year including legal restrictions on the use of the funds, and identification of funds that are shared on a regional or countywide basis.

City of Cupertino has submitted the Cost Reporting Summary and Source of Funds Summary in good faith, based on the best available stormwater program cost reporting data compiled from multiple sources and departments within City of Cupertino. As such, it is important to recognize the inherent limitations associated with the summaries including:

- The values provided are compiled from multiple, internal sources and different cost accounting programs, and attempt to separate out duties and time that staff spend complying with the numerous requirements in the MRP. As a result, the individual and compiled values may differ from the adopted budgets.
- Given the difficulty in accounting for the wide range of staff and expenditures associated with the implementation of the stormwater program throughout the City of Cupertino, the values in the Cost Summary Table are rounded to the nearest \$1,000.
- Given the diversity of the Bay Area permittee agencies in size, characteristics, and jurisdiction, the costs presented for various program areas may or may not be comparable among permittees.

Sources of Funds for Implementation of the MRP

Permittee Name	City of Cupertino
Current Reporting FY	2024-2025

[illegible]

^a An example of funding resources shared on a regional or countywide basis is a grant used for MRP compliance tasks which benefits multiple countywide programs in a region or multiple permittees

Provision C.20, Cost Reporting Framework
Summary of Estimated Costs

Permittee Name	City of Cupertino
Current Reporting FY	2024-2025

		Estimated Cost by Category						
Permit Provision	Program Area	Personnel ^b & Overhead Costs ^c (Not O&M related)	External Professional Services/Other Costs ^d (Not O&M related)	Capital Expenditures ^e		Operation and Maintenance (O&M) Costs ^h	Estimated Total Expenditures for Current Reporting Year	Estimated Total Expenditures for Next Reporting Year
				Planning, Design, Permitting & Construction ^f	Land Acquisition Costs ^g			
---	Program Management ^a	\$ 242,000	\$ 48,000				\$ 290,000	\$ 300,000
---	Stormwater Permit Fees		\$ 27,000				\$ 27,000	\$ 27,000
C.2	Municipal Operations	\$ 74,000	\$ 11,000	\$ -	\$ -	\$ -	\$ 85,000	\$ 88,000
C.3	New Development and Redevelopment	\$ 31,000	\$ 10,000	\$ 455,000	\$ -	\$ 45,000	\$ 541,000	\$ 552,000
C.4	Industrial and Commercial Site Controls	\$ 108,000	\$ 2,000				\$ 110,000	\$ 113,000
C.5	Illicit Discharge Detection and Elimination	\$ 289,000	\$ 2,000				\$ 291,000	\$ 298,000
C.6	Construction Site Control	\$ 52,000	\$ 1,000				\$ 53,000	\$ 54,000
C.7	Public Information and Outreach	\$ 98,000	\$ 16,000				\$ 114,000	\$ 117,000
C.8	Water Quality Monitoring	\$ -	\$ 38,000				\$ 38,000	\$ 39,000
C.9	Pesticides Toxicity Control	\$ 46,000	\$ 12,000				\$ 58,000	\$ 59,000
C.10	Trash Load Reduction and Assessment	\$ 37,000	\$ 13,000	\$ -	\$ -	\$ 340,000	\$ 390,000	\$ 390,000
C.11	Mercury Controls	\$ 5,000	\$ -				\$ 5,000	\$ 5,000
C.12	PCBs Control	\$ 2,000	\$ 14,000	\$ -	\$ -	\$ -	\$ 16,000	\$ 16,000
C.13	Copper Control	\$ 2,000	\$ -				\$ 2,000	\$ 2,000
C.14	Bacteria Control	\$ 2,000	\$ -				\$ 2,000	\$ 2,000
C.15	Exempted and Conditionally Exempted Discharges	\$ 2,000	\$ 1,000				\$ 3,000	\$ 3,000
C.16	Discharges to Areas of Special Biological Significance	\$ -	\$ -				\$ -	\$ -
C.17	Discharges Associated with Unsheltered Homeless Populations	\$ 2,000	\$ 2,000				\$ 4,000	\$ 4,000
C.18	Control of Sediment Discharges from Coastal San Mateo County Roads	\$ -	\$ -				\$ -	\$ -
C.19	Cities of Antioch, Brentwood, and Oakley, and Unincorporated Contra Costa County and Contra Costa County Flood Control and Water Conservation District	\$ -	\$ -				\$ -	\$ -
C.21	Asset Management	\$ -	\$ 2,000				\$ 2,000	\$ 2,000
Estimated Total Expenditures by Category		\$ 992,000	\$ 199,000	\$ 455,000	\$ -	\$ 385,000		
Estimated Total Expenditures for Stormwater Program							\$ 2,031,000	\$ 2,071,000

^a Includes activities associated with the general administration and management of the stormwater program as well as the development of the cost reporting (C.20), the annual reporting (C.22), and the permit renewal processes (C.25).

^b Cost of Permittee staff labor (i.e., labor rates or dollar amounts that include direct labor cost and cost of benefits) on stormwater permit-related activities.

^c Costs of maintaining the infrastructure of the organization such as management, finance support services, janitorial, motor pool, etc.

^d Includes the Permittee's contribution to the countywide program budget (reported by provision/program area) and costs not included in the other categories.

^e Fixed, one time expenses incurred on the purchase of land, buildings, and equipment, or expenditures related to the planning, design, permitting, and construction of stormwater quality related assets. It only applies to the following provisions: C.2, C.3, C.10, and C.12.

^f Costs associated with planning, design, permitting, and construction of stormwater quality related assets.

^g One time cost of real property, exclusive of the cost of any constructed assets on the property, necessary to be acquired for projects. Typically applies to the purchase of land for construction of stormwater quality assets if the land is not already owned by the Permittee.

^h Costs related to the O&M of publicly owned stormwater quality-related assets constructed for stormwater permit compliance. Includes personnel, contractor, equipment, materials, and disposal costs related solely to O&M. It only applies to the following provisions: C.2, C.3, C.10, and C.12.

Section 21 – Provision C.21 Asset Management

C.21.c.i ► Asset Management Plan				
(For FY 24-25 Annual Report Only) Did your agency develop an Asset Management Plan to comply with MRP requirements by June 30, 2025?	☒	Yes, see attached Asset Management Plan	☐	No
If No, provide schedule for completion:				



CUPERTINO

Stormwater Asset Management Plan

City of Cupertino

June 2025

*In compliance with the San Francisco Bay Municipal Regional Stormwater
National Pollutant Discharge Elimination System (NPDES) Permit, Order No.
R2-2022-0018, Provision C.21.*

SCVURPPP Asset Management Plan Template

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1.0 Executive Summary

The City of Cupertino developed this Asset Management Plan to guide implementation of operation and maintenance (O&M) of assets installed to comply with the Municipal Regional Stormwater Permit (MRP). Through implementation of this Asset Management Plan, the City of Cupertino can more effectively plan for system replacements and upgrades to meet MRP goals.

The MRP requires permittees to develop asset management plans to ensure the satisfactory condition of all hard assets. In the context of stormwater, hard assets are publicly-owned structural controls that serve a water quality function. Examples provided in the MRP include bioretention areas, pervious pavement systems, and full trash capture devices. The MRP also specifically requires each asset management plan to include a description of asset categories, an asset inventory, an Operation, Maintenance, Rehabilitation, and Replacement Plan (O&M Plan), and a reporting strategy.

The purpose of this Asset Management Plan is to serve as a long-range O&M planning document that provides a rational framework for:

- Identifying and categorizing assets;
- Characterizing the conditions of assets;
- Prioritizing O&M activities;
- Managing and analyzing asset data; and
- Determining current and future costs.

This Asset Management Plan establishes a categorization hierarchy for the City of Cupertino's structural controls that serve a water quality function. The hierarchy includes: Control Type, in which are assets categorized at a high level based on the source of their requirements (e.g., Provision C.3 or C.10) and whether they meet low impact development (LID) treatment standards or not; Asset Category, which refers to groups of assets that generally function similarly; and Asset Class, which represents the specific types of assets that have been constructed. All of the assets within the hierarchy make up the City of Cupertino's asset inventory.

In order to inform a strategy for prioritizing and scheduling O&M of inventoried assets and to comply with the MRP, this Asset Management Plan includes an O&M Plan. The O&M Plan will guide how data are obtained through asset assessment and evaluated with a risk-based prioritization strategy that considers an asset's likelihood of failure and consequence of failure when establishing O&M schedules. Data obtained with the O&M Plan will be stored Cityworks, the City of Cupertino's hard asset data management system.

In addition to strategic prioritization of O&M, it is useful to understand costs which directly impact the amount of resources that can be allocated for asset management. For the purposes of this Asset Management Plan, the City of Cupertino considered costs related to the processes for:

1. Prioritizing and scheduling O&M activities;
2. Evaluating the current condition, and identifying the need for maintenance, rehabilitation and replacement of inventoried assets;
3. Carrying out the routine maintenance, rehabilitation, and/or replacement of inventoried assets; and
4. Conducting reevaluation of risk and prioritization as part of adaptive management.

On an ongoing basis, the City of Cupertino will compare cost projections with available funding sources. Per Provision C.20 of the MRP, Permittees are required to report costs of permit implementation annually, at the end of each fiscal year, and estimate costs of implementation for the subsequent fiscal year. City of Cupertino will use the Bay Area Cost Reporting Framework to estimate and report costs for permit implementation, including implementation of asset management requirements.

The City of Cupertino will report on Asset Management Plan implementation annually, starting with the 2026 Annual Report. At a minimum, for each asset in the inventory, the City of Cupertino will provide the following information:

- Asset category;
- Relevant design information;
- Tributary drainage area;
- Location;
- Condition; and
- O&M need.

2.0 Terminology and Definitions

The following is a list of terminology used throughout the Asset Management Plan and the definitions for each.

- **Asset** – physical structures, including all associated or integrated components, that serve a water quality function
- **Asset Category** – groups of assets that are functionally similar
- **Asset Class** - specific types of assets that are represented in the inventory
- **Asset Condition** - the physical state of the asset determined based on periodic inspections
- **Asset Inventory** – the list of publicly owned structures serving a water quality function that are managed, operated, and maintained
- **Component** – a single physical part of an asset that supports its functionality
- **Consequence of Failure** – measure of the magnitude of impact
- **Control Type** – high level groupings of assets based on the source of their requirements (e.g., Provision C.3 or C.10) and whether they meet LID standards or not
- **Corrective Maintenance** – activities conducted to repair, rehabilitate, or replace failing parts of an asset, where failures are not significant enough to trigger full replacement of the asset
- **Cost of Failure** – total cost of replacing or significantly rehabilitating an asset to restore function, including the cost of mitigating any impacts associated with its failure
- **End of Life** – the date or point in time at which the asset is no longer expected or considered to be functioning as intended
- **Life Cycle Cost** – an aggregated set of costs for each stage of an asset's life cycle that is used to identify cost-effective interventions to make throughout its life
- **Likelihood of Failure** – measure of the probability that an asset will fail due to considerations such as asset condition, function, location, or age
- **Rehabilitation** – Non-routine maintenance activities that pertain to the majority of the system or include excavation and/or construction of new components
- **Repair** – Spot treatment to restore isolated damage
- **Replacement** – removal of all or a majority of the asset and reconstruction of the same or similar asset to fulfill its intended function
- **Risk** – the combined consideration of likelihood of failure and consequence of failure
- **Routine Maintenance** – ongoing activities conducted during all or most maintenance visits that may include minor repairs but are not significant enough to be considered rehabilitations, replacements, or upgrades
- **Upgrades** – enhancements made to an asset to improve functionality and performance or limit, reduce, or avoid asset failure.

3.0 Introduction

Stormwater quality-related assets such as bioretention areas, pervious pavement systems, and full trash capture devices, are relatively new to municipal asset inventories. The majority of these assets were recently constructed or installed and have not yet begun to fail, but as they age, there is potential for unknown or undiscovered issues if they are not properly inspected and maintained. Asset management can reduce unexpected, expensive, and reactive repairs and increase asset performance over their functional life. An effective asset management plan will guide efficient implementation of operation and maintenance (O&M) of assets installed to comply with the Municipal Regional Stormwater Permit (MRP). Through implementation of an asset management plan, the City of Cupertino can more effectively plan for needed system replacements and upgrades to meet MRP goals.

This section provides a general description of the City of Cupertino and characteristics relevant to asset management; a description of MRP Provision C.21 requirements and rationale for stormwater quality-related asset management; and a discussion of the purpose and scope of this Asset Management Plan.

3.1 Agency Description

Cupertino's land use pattern was largely built on a conventional suburban model, with predominantly single-family residential subdivisions and distinct commercial and employment centers. This development pattern was also heavily influenced by the topography of the area, with more intensive growth located on the valley floor and lower design residential on the foothills. The western area by the foothills is semi-rural with steep terrain, larger residential lots and access to open space. The pattern becomes more suburban immediately west of Highway 85 where residential neighborhoods have a more uniform pattern with smaller lots and older commercial and industrial areas along Stevens Creek Boulevard and Bubb Road. The land use pattern becomes more urban east of Highway 85, with a relatively connected street grid and commercial development along major boulevards such as Stevens Creek, De Anza, Homestead, Stelling and Wolfe. This area also has significant amounts of multi-family development in and around the major boulevards.

The suburban pattern is also reflected in building locations, with most of the older buildings set back from the street with parking lots in the front. Streets have also been historically widened to accommodate larger volumes of traffic, often to the detriment of other forms of transportation such as walking, biking and transit, although the City has made strides towards improving walkability and bikeability by retrofitting existing streets to include bike lanes; creating sidewalks lined with trees along major boulevards; and

encouraging development to provide a more pedestrian-oriented frontage with active uses, gathering places and entries lining the street.

City staff charged with permit compliance and reporting work across divisions to understand and gather data from the work order management system that guides preservation of city assets of various types, including stormwater. This partnership has informed development of this plan and the assessment and maintenance of assets going forward.

3.2 MRP Requirements

The City of Cupertino is one of 79 agencies subject to the requirements of the San Francisco Bay Area Municipal Regional Stormwater Permit (MRP). Provision C.21 of the MRP requires each permittee to develop and implement an Asset Management Plan in order to ensure the satisfactory condition of all hard assets constructed to comply with various provisions of the MRP, such as Provision C.3 (New and Redevelopment Controls) and C.10 (Trash Load Reduction).

The MRP defines hard assets, in the stormwater context, as publicly-owned structural controls that serve a water quality function. Examples provided in the MRP include, but are not limited to, bioretention areas, pervious pavement systems, and full trash capture devices. Permittees must develop an Asset Management Plan by June 30, 2025, and begin implementing the Plan by July 1, 2025.

Per MRP requirements, the Asset Management Plan must include, at a minimum:

1. A description of asset categories.
2. An inventory (or link to such an inventory) of existing assets, including at a minimum all Low Impact Development (LID)/(Green Infrastructure (GSI) systems and trash capture devices.
3. An Operation, Maintenance, Rehabilitation, and Replacement Plan (Asset Management O&M Plan) with processes for:
 - a. Prioritizing and scheduling O&M;
 - b. Evaluating asset conditions and identifying the need for and carrying out rehabilitation and replacement of inventoried assets; and
 - c. An evaluation or forecast of costs necessary for the implementation of a. & b. above, at least through the end of the current permit term.
4. A strategy for reporting on Asset Management Plan implementation to the Regional Water Quality Control Board (Water Board) annually.

Plans must be submitted to the Water Board with the 2025 Annual Report and implementation reports must be submitted annually beginning with the 2026 Annual Report. The MRP also requires reassessment and updates to Asset Management Plans on an as-needed basis, to address changing conditions and resources.

3.3 Asset Management Plan Purpose

Asset management planning creates an opportunity for municipalities to strategically manage their assets in a cost-efficient manner, while reducing risks of asset failure. Development of an asset management plan can help to improve the way work is done, knowledge is managed, and limited finances are used effectively.

The purpose of this Asset Management Plan (Plan) is to serve as a long-range O&M planning document that provides a rational framework for:

- Identifying and categorizing assets;
- Characterizing the conditions of assets;
- Prioritizing O&M activities;
- Managing and analyzing asset data; and
- Determining current and future costs.

The Plan is intended to guide efficient implementation of O&M for existing and future hard assets that serve a water quality function, such as bioretention areas, pervious pavement systems, and full trash capture devices, per Provision C.21 of the MRP. While assets discussed in this Plan may connect to stormwater conveyance systems, the assets pertaining to those stormwater conveyance systems are not included in the inventory of assets to be managed under this Plan.

4.0 Stormwater Quality Asset Inventory

The City of Cupertino has assets across some of the Control Types and Asset Categories. In total, there are 523 assets owned by the City of Cupertino. Section 6 provides details on how The City of Cupertino tracks and manages tabular and geospatial data for each asset. The entire asset inventory list is included in Appendix A and B.

Asset hierarchies help to make data management and determination of risk levels more efficient. Figure 1 shows the asset hierarchy used for this Plan.

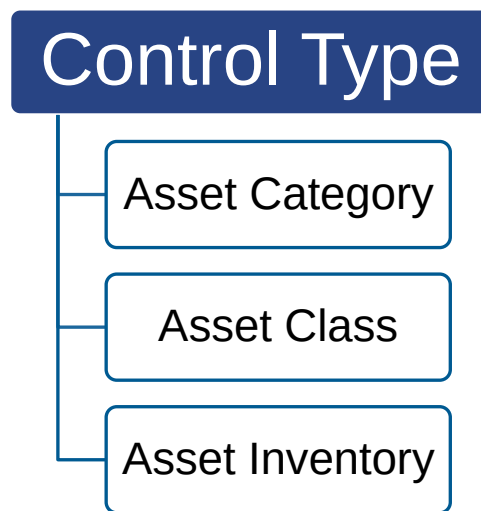


Figure 1. Asset Hierarchy

Control Type groups assets at a high level based on the source of their requirements (e.g., Provision C.3 or C.10) and whether they meet LID standards or not. Asset Category is the next grouping that refers to groups of assets that generally function similarly. Asset Class represents the specific type of assets that have been constructed. Finally, the asset inventory is the list or database of actual assets and their characteristics. Table 1 below defines the top three levels of the hierarchy for stormwater quality-related structural controls included in this Plan.

Table 1. Asset Hierarchy Definition

Control Type	Asset Category	Asset Class
LID/GSI	Biotreatment Systems	- Bioretention lined with underdrain - Bioretention unlined with underdrain - Bioretention unlined w/o underdrain - Flow-through planter lined with underdrain - Tree well filter with bioretention soil with underdrain - Tree well filter with bioretention soil w/o underdrain - Green Roof
	Infiltration	- Infiltration trench - Proprietary media filter system - Subsurface infiltration system - Dry wells - Pervious pavement with underdrain - Pervious pavement w/o underdrain
	Capture and use systems	- Rainwater harvesting (e.g., cisterns) - Stormwater capture and use (regional)
Non-LID Treatment Systems	High flow rate media systems	- Media filters (e.g., Vault-based high flowrate media filters) - Media filter with vegetation (e.g., Tree-box-type high flowrate biofilters) - Sand filters
	Others	- Extended detention basin - Vegetated swale - Constructed wetlands - Hydromodification vault - Hydromodification basin - Water Quality Pond
Trash Controls	Full Trash Capture systems/devices	- Hydrodynamic separator ▪ Vortex separators (e.g., CDS) ▪ Baffle boxes (NSBB/DSBB) - GSRD - Gross solids removal device - Netting devices - Surface inlet baskets/screens - Outflow screens (e.g., CPS)
	Partial Trash Capture Devices	- Auto retractable screen (ARS) - Fixed screen
	Other types of trash control devices	- Interceptors - Debris Rack - Media Filters

It should be noted that each asset has components on which inspection and maintenance may be focused at any given time. For example, bioretention components include concrete curbs/braces, plants, mulch, soil, underdrain, and drain rock. For the purposes of this Asset Management Plan, a single asset is considered the entire water quality structure or system and all of its components. Thresholds for what triggers replacement of an asset will be based on consideration of the entire asset.

4.1.1 Equipment Related to Stormwater Quality

Equipment related to stormwater quality may include types of equipment such as trash receptacles and pet waste stations. While they have been included in the MRP as examples of hard assets, they do not meet the criteria to be considered or managed as structural controls (e.g., O&M is performed on an as-needed basis instead of having periodically scheduled inspections for assessment of condition and maintenance to achieve the minimum condition for performance, as described in Section 5). Therefore, they will not be included in the Asset Management O&M Plan.

The City of Cupertino currently manages trash receptacles through its solid waste management program. Receptacle locations and conditions are managed for waste collection purposes only, since they will be located in either drainage areas of structural trash controls (addressed under this Asset Management Plan) or within areas of other programmatic trash management activities that are evaluated by on-land visual trash assessments (per requirements of MRP Provision C.10 Trash Load Reduction).

Several Santa Clara County municipalities are currently subject to the C.14 Bacteria Controls Provision of the MRP. Pet waste stations and other equipment that may typically be used to help address bacteria are managed under City of Cupertino Grounds and Right of Way Divisions within the Public Works Department and are not included as assets under this Plan.

5.0 Asset Management O&M Plan

This section describes the City of Cupertino Asset Management O&M Plan that will guide how data is obtained through asset assessment and evaluated in order to inform a strategy for prioritizing and scheduling maintenance, rehabilitation, and replacement of inventoried assets. The process described here includes assessing asset condition and determining a risk-based prioritization strategy.

5.1 Asset Condition Assessment

Asset condition inspections and assessments inform immediate and future O&M needs for optimal performance. In addition, condition assessments rank asset criticality as described in Subsection 5.1.3.

Stormwater volume and pollutant load reduction, necessary to comply with applicable MRP Provisions, are evaluated and incorporated as part of the siting, design, and installation of stormwater hard assets such as full trash capture devices and bioretention areas. If an asset is impeded in some way, then the intended design-based performance could be affected. The standard for management of stormwater quality related assets, as expressed in MRP Provision C.21.b.i.(3)(b)(i), is to maintain “the minimum condition necessary to achieve minimum performance level(s) for each type of hard asset”.

The City of Cupertino developed and utilizes the process detailed below for evaluating asset condition and identifying the need for and carrying out, as appropriate, the routine/corrective maintenance, rehabilitation, and replacement of inventoried assets (per Provision C.21.b.i.(3)(b)). The condition assessment approach is specific to the asset control type and will be conducted as a part of the implementation of this Asset Management Plan, beginning in FY 25-26. The approach takes into account factors such as design, capacity, condition, and function relative to the asset's design, intended operating conditions, and intended function.

5.1.1 Data Collection Process

The City of Cupertino will collect data on the condition of all assets within the inventory. The process will involve field inspections conducted by a combination of maintenance and inspection staff depending on the oversight of the particular asset. Data will be collected using electronic forms and stored in the City of Cupertino database used for managing O&M as later described in Section 6. It is anticipated that this initial data collection process will be completed within one year, and no prioritization has been established for the order in which data will be collected. Data will be collected by a

combination of maintenance staff and environmental program staff and uploaded directly in the field to Cityworks.

5.1.2 Parameters to Evaluate Asset Condition

Tables 2, 3, and 4 describe the parameters that will be used for evaluating the condition of assets. Table 2 outlines the parameters for LID/GSI. Table 3 outlines the parameters for Non-LID assets. Finally, Table 4 shows the parameters for trash control assets. Only applicable parameters will be rated for each asset class and separate score ranges will be applied. The parameters and scoring are subject to change as the City of Cupertino's asset management program evolves based on lessons learned and adaptive management.

Table 2. LID/GSI Condition Assessment Parameters

		Parameters							
		Plant Health	Mulch	Irrigation System	Trash /Debris	Erosion/ Sediment ation	Structure	Drainage & Standing Water	Clogging or Blockage
Biotreatment Systems	Bioretention lined with underdrain	X	X	X	X	X	X	X	X
	Bioretention unlined with underdrain	X	X	X	X	X	X	X	X
	Bioretention unlined w/o underdrain	X	X	X	X	X	X	X	X
	Flow-through planter lined with underdrain	X	X	X	X	X	X	X	X
	Tree well filter with bioretention soil with underdrain	X	X	X	X	X	X	X	X
	Tree well filter with bioretention soil w/o underdrain	X	X	X	X	X	X	X	X
	Green Roof	X		X			X	X	X
Infiltration	Infiltration trench				X	X	X	X	X

	Subsurface infiltration system				X		X	X	X
	Dry wells				X		X	X	X
	Pervious pavement with underdrain				X	X	X	X	X
	Pervious pavement w/o underdrain				X	X	X	X	X
Capture and Use Systems	Rainwater harvesting (e.g., cisterns)				X		X		X
	Stormwater Capture and Use (regional)				X		X		X

Table 3. Non-LID Condition Assessment Parameters

Parameters									
		Plant Health	Mulch	Irrigation System	Trash/Debris	Erosion/ Sedimentation	Structure	Drainage & Standing Water	Clogging or Blockage
High Flow Rate Media Systems	Media filters (e.g., Vault-based high flowrate media filters)				X		X	X	X
	Media filter with vegetation (e.g., Tree-box-type high flowrate biofilters)	X	X	X	X	X	X	X	X
	Sand filters				X	X	X	X	X
Other	Extended detention basin				X	X	X	X	X
	Vegetated swale	X		X	X	X	X	X	X
	Constructed wetlands	X			X	X	X		X

	Hydromodification vault				X		X	X	X
	Hydromodification basin				X	X	X	X	X
	Water Quality Pond				X		X		X

Table 4. Trash Control Devices Condition Assessment Parameters

Parameters										
		Screen Plugging	Screening Portion Capacity	Water Depth	Vectors	Structure	Net	Net Attachment	Net Capacity	Net Attachment Structure
Full Trash Capture Systems/Devices	Hydrodynamic separator	X	X	X	X	X				
	GSRD - Gross solids removal device	X	X	X	X	X				
	Netting devices			X	X	X	X	X	X	X
	Surface inlet baskets/screens	X	X	X	X	X				
Partial Trash Capture Devices	Outflow screens (e.g., CPS)	X	X	X	X	X				
	Auto retractable screen (ARS)	X	X	X	X	X				
Other types of trash control devices	Fixed screen	X	X			X				
	Booms		X			X				
	Interceptors	X	X	X	X	X				
	Debris Rack	X	X	X	X	X				
	Media Filters	X	X	X	X	X				

The condition assessment will evaluate the parameters associated with each of the assets, as indicated in Tables 2, 3, and 4. The City of Cupertino grouped assets with similar sets of parameters to create a consolidated set of condition assessment scoring tables. The City of Cupertino will evaluate the overall condition for each individual asset based on the condition assessment parameters. Figure 2 shows the condition assessment scoring level rubric that will be used, with descriptions for each scoring level.

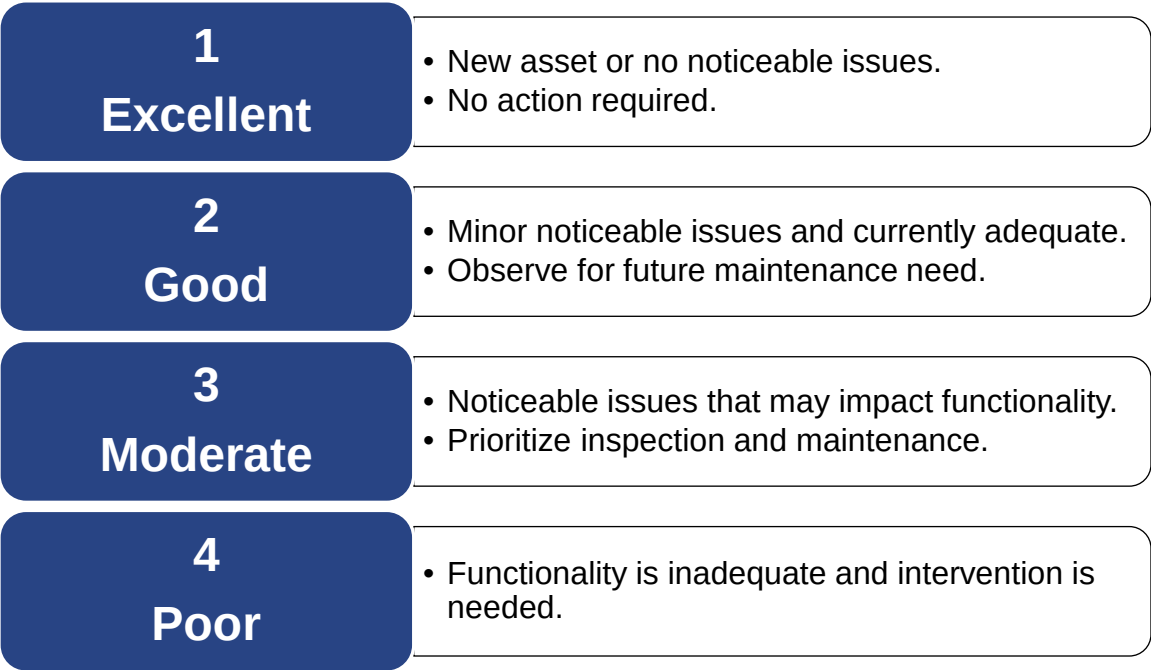


Figure 2. Condition Assessment Rating Rubric

5.2 Risk Evaluation

Evaluating risk can ultimately inform prioritization strategies for efficient use of limited resources. Assets that are determined to be at higher risk of failure can be prioritized for maintenance, allowing greater access to necessary resources for maintaining their condition. Assets with lower risk of failure will still need access to resources for maintenance but at a lower level or frequency. For asset management planning, an initial risk level is identified for setting frequencies of inspection and maintenance

activities for assets. The risk level may be periodically evaluated and updated along with asset inspection and maintenance frequencies, based on data collection or new information. The two primary components for determining risk are likelihood of failure and consequence of failure.

5.2.1 Likelihood of Failure

Likelihood of Failure (LoF) is a metric, or consideration, based on known or collected data or anecdotal information. An asset's functional condition can be the sole basis for the LoF, but if more information is available, it can be determined as a composite score/consideration that includes information such as asset age, performance, asset residual life, maintenance history, and capacity. Given that an asset's condition is a point-in-time assessment, one assessment may not be representative of the asset's actual LoF, if that asset is exposed to variable external conditions affecting its performance. For example, trash loads can be variable within a given trash management area. If a connector pipe screen is inundated with trash prior to a condition assessment, its observed condition may not be representative for that particular location and thus may not be a good indicator of overall frequency needs. Utilizing a composite score or set of observations can help offset this potential for over-conservative LoF classification. The City of Cupertino identified the potential LoF considerations shown in Table 5 below.

Table 5. Likelihood of Failure Considerations per Control Type

Potential LoF Parameters	Applicable Control Type
Condition Assessment	All
Location in high pedestrian traffic area	GSI/LID & Non-LID
Presence of pumps	GSI/LID & Non-LID
Location in area with significant vegetative debris	Trash Controls

5.2.2 Consequence of Failure

Consequence of failure (CoF) is a measure of the magnitude of impact (e.g., on public safety, water quality, and permit compliance) an asset will have if it fails. Considering CoF helps guide municipalities to which assets should have priority and demonstrate why. For example, should the CoF for an asset be a threat to public safety, that asset would likely be considered to have a more critical need for resources. CoF can be a consideration or score that is based on one or a combination of parameters, similar to LoF. Table 6 lists potential parameters for CoF scoring/consideration.

Table 6. Consequence of Failure Parameters

Potential CoF Parameters

Size of Drainage Area (i.e. small, medium, or large area with larger resulting in greater impact to water quality)
Cost of Repair/Replacement (small, medium, or large size asset)
Proximity to Public Space

5.2.3 Risk

Risk analysis is conducted by assessing a combination of LoF and CoF. Once the LoF and CoF is determined for each asset, the City of Cupertino in conjunction with SCVURPPP will evaluate overall risk by combining LoF and CoF scores utilizing the equation shown in Figure 3. The City of Cupertino will allow room for modifications to the risk analysis approach and outputs based on best professional judgement (e.g., historical knowledge that doesn't align with scores).



Figure 3. Risk Analysis Calculation

When combined with a risk analysis, LoF and CoF considerations/scores allow for development of a risk profile or matrix. Once completed, the City of Cupertino will utilize the profile as a guide for prioritizing inspection and maintenance frequencies for assets.

5.3 O&M Prioritization Strategy

It is generally not cost-effective and often infeasible to maintain all assets at the same frequency and to the same extent. Even with sufficient resources, implementing a homogenous maintenance regime may not be the best use of public funds. The risk-based approach to prioritizing and scheduling actions is a more cost-effective means of maintaining asset conditions. The risk-based approach described in the previous section establishes the assignment of asset priorities based on the likelihood and consequence of failure for each. This section identifies the strategy for implementing O&M per the risk-based analysis for each asset.

5.3.1 Prioritization and Scheduling

The City of Cupertino will evaluate the findings from the risk analysis to inform a strategy for prioritizing and scheduling maintenance, rehabilitation, and replacement of

inventoried assets. O&M actions will be assigned based on the risk category (e.g. High, Medium, or Low) identified for each asset.

Scheduling and frequency will need to consider several factors assessed against the asset risk analysis. Once the entire inventory has been analyzed and assessed for condition, the City of Cupertino will evaluate an approach to scheduling O&M based on funding availability. In addition, the City of Cupertino will take into account the geographical locations for all assets and the internal responsibility assigned for O&M. For example, assets may be maintained by different departments, and each has other non-stormwater assets for which they are responsible. O&M scheduling may need to take into account grouping of assets by department and geographical location for more efficient use of resources.

5.3.2 Adaptive Management

The City of Cupertino will periodically reassess and update the Asset Management Plan and O&M Prioritization Strategy on an as-needed basis. Changing conditions and resources will be considered and modifications to risk analyses, O&M prioritization, and scheduling frequencies may be made. The first year of implementation of the Asset Management Plan will be an opportunity to begin to implement the O&M strategy and refine internal processes.

6.0 Stormwater Quality Asset Data Management

Asset data management is an integral part of the overall asset management program for the City of Cupertino. Asset data is needed for identifying and categorizing assets; characterizing the conditions of assets; prioritizing O&M activities; and determining current and future costs.

The Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) developed an interactive data portal for Stormwater Treatment Measures (STMs) that align with the asset Control Types GSI/LID and Non-LID. The STM Data Portal (Data Portal) includes parcel-based, right of way, and regional public projects and has an integrated map showing the project locations. The Data Portal serves an online GSI/LID and Non-LID tracking system to obtain, store, and access Provision C.3-regulated and non-regulated project data at a countywide level. The system also allows projects, control measures, land use type, and acres of treatment to be visualized spatially on the web. It also serves as the tracking and mapping tool that includes a component available to the public as required by Provision C.3.j.ii.(1)(e). As part of Asset Management Plan implementation, SCVURPPP will be updating the Data Portal and associated resources to accommodate additional asset tracking and reporting information on behalf of its member agencies.

Additionally, SCVURPPP collects and manages trash control measure data for the purpose of complying with MRP Provision C.10 tracking and reporting requirements. C.10 requires Co-permittees to collect and retain device-specific maintenance records including device type, design, location, drainage area, and O&M documentation. The data SCVURPPP tracks at a countywide level largely addresses the needs for asset inventory management. As part of Asset Management Plan implementation, the City of Cupertino will coordinate with SCVURPPP to identify any additional data collection needs.

City of Cupertino's asset data management system, Cityworks, currently accounts for all full trash capture assets and associated inspections and cleaning. All LID/GSI assets will be integrated into Cityworks as they are identified and constructed. Condition assessment parameters will be included in the full trash capture bi-annual inspection data collection process and LID/GSI condition assessment parameters will be created and associated with the LID/GSI assets.

7.0 Current and Future Costs and Funding Sources

Asset management planning can guide cost effective use of resources for ongoing O&M programs. In addition to strategic prioritization of O&M, it is useful to understand asset-related costs which directly impact the amount of resources that can be allocated. Furthermore, the ongoing asset management planning and adaptive management will also incur costs. For the purposes of this Asset Management Plan, the City of Cupertino considered costs related to the processes for:

1. Prioritizing and scheduling O&M activities;
2. Evaluating the current condition, and identifying the need for maintenance, rehabilitation and replacement of inventoried assets;
3. Carrying out the routine maintenance, rehabilitation, and/or replacement of inventoried assets; and
4. Conducting reevaluation of risk and prioritization as part of adaptive management.

On an ongoing basis, the City of Cupertino will compare cost projections with available funding sources to determine the best manner in which to fund the operation, maintenance, rehabilitation, and replacement of inventoried assets.

Per Provision C.20 of the MRP, Permittees are required to report costs of permit implementation annually, at the end of each fiscal year, and estimate costs of implementation for the subsequent fiscal year. The City of Cupertino will use the Bay Area Cost Reporting Framework to estimate and report costs for permit implementation, including implementation of asset management requirements. The efforts described in this section to evaluate and forecast costs to implement the Asset Management Plan will be coordinated with and inform Provision C.20 cost reporting but will be performed by the City of Cupertino specifically to plan and allocate resources to asset management tasks.

7.1 Cost Evaluation for Asset Management Planning and Implementation

Over the course of the first year of Asset Management Plan implementation, the City of Cupertino will conduct condition assessments, perform a risk analysis, and prioritize and schedule O&M actions. As part of the development of this Asset Management Plan, the City of Cupertino evaluated the level of effort necessary to complete each of these tasks in Year 1 (FY 25/26) when compared to the total asset inventory. The City of Cupertino also estimated future costs for FY 26/27, the last year of the MRP term. In order to determine future costs, the City of Cupertino evaluated the level of effort for each activity per year. The first year is anticipated to have higher costs due to the initial startup activities. The results of the cost evaluation are shown in Table 7.

Table 7. Cost Evaluation for Current Permit Term

Activity	Total Costs	
	FY 25/26	FY 26/27
Condition Assessments	\$11,366	\$0
Risk Analysis	\$3,030	\$0
Prioritization and Scheduling of O&M	\$10,296	\$10,296
Conducting O&M Activities	\$31,177	\$31,177

Without completing the first three activities listed in Table 7, the City of Cupertino cannot adequately assess the estimated costs for operation, routine maintenance, and rehabilitation. However, the City of Cupertino will consider evaluating and forecasting these costs using factors such as cost per asset or cost per square foot that can be applied to develop future costs and that consider inventory growth, changing asset conditions, and escalation.

It is worth noting that rehabilitation costs are more difficult to estimate because rehabilitation needs depend on many variables. Stormwater assets may need rehabilitation due to unpredictable external events, lack of maintenance, or other factors. Implementing corrective maintenance as part of the O&M strategy can potentially mitigate this issue.

Replacement costs are also challenging to estimate for many of the assets considered in this plan, because they are relatively new and there is limited data available related to the longevity of these assets. However, using the installation date for each asset, the City of Cupertino will assume an end-of-life scenario and estimate a useful life for each asset class. Then, the City of Cupertino will estimate the expected replacement cost based on the cost of installation escalated to the year in which the asset may ultimately fail.

8.0 Asset Management Reporting Strategy

The City of Cupertino will report on Asset Management Plan implementation annually, starting with the 2026 Annual Report. The City of Cupertino will provide an inventory of all assets accounted for in the Asset Management Plan.

At a minimum, for each asset in the inventory, the City of Cupertino will provide the following information:¹

- Asset category;
- Relevant design information;
- Tributary drainage area;
- Location;
- Condition; and
- O&M need.

Based on periodic inspections, either by municipal or contracted staff, the City of Cupertino will update the condition and O&M need for inclusion with the annual report. The inspection frequencies and updates will be tied to the risk analysis and prioritization process described in Section 5.

¹ Per discussions with the Bay Area Municipal Stormwater Collaboration (BAMSC) Asset Management Work Group and the SCVURPPP Information Management Work Group, all asset management data will be submitted in the City of Cupertino's Annual Report. No data compilations or summaries at the countywide or regional level will be reported.

Appendix A – LID/GSI Inventory

Project Name	Asset Name	Control Type	Asset Category	Asset Class	Address/Location
Jollyman Park	Bio 1 / DMA 1	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	1000 Stelling Rd, Cupertino
Jollyman Park	Bio 2 /DMA 2	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	1000 Stelling Rd, Cupertino
Jollyman Park	Bio 3 / DMA 3	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	1000 Stelling Rd, Cupertino
Blackberry Farm	Bioswale	Non-LID Treatment System	Infiltration	Vegetated Swale	21979 San Fernando Ave, Cupertino
Blackberry Farm	Pervious Pav	LID/GSI	Infiltration	Pervious Pavement w/o underdrain	21979 San Fernando Ave, Cupertino
Alan Row	Bioretention Basin 1	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 2	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 3	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 4	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 5	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 6	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
Alan Row	Bioretention Basin 7	LID/GSI	Biotreatment System	Bioretention Lined with Underdrain	22690 Stevens Creek Blvd, Cupertino
McClellan Ranch	Pervious Pav	LID/GSI	Infiltration	Pervious Pavement w/o underdrain	22221 McClellan Rd, Cupertino

Appendix B

Inventory of City of Cupertino Full Trash Capture Devices.
Please see the following links:

Pdf version:

<https://scvurppp.org/trash-maps/>.

ArcGIS on-line version (available only to Regional Water Board staff):

<https://experience.arcgis.com/experience/2450b59dc80449c29e6b4092bf0a7633>