



# B A S M A A

Alameda Countywide  
Clean Water Program

Contra Costa  
Clean Water Program

Fairfield-Suisun  
Urban Runoff  
Management Program

Marin County  
Stormwater Pollution  
Prevention Program

Napa County  
Stormwater Pollution  
Prevention Program

San Mateo Countywide  
Water Pollution  
Prevention Program

Santa Clara Valley  
Urban Runoff Pollution  
Prevention Program

Sonoma County  
Water Agency

Vallejo Sanitation  
and Flood  
Control District

March 20, 2012

Bruce Wolfe, Executive Officer  
San Francisco Bay Regional Water Board

Subject: Trash Plans

Dear Mr. Wolfe:

The Bay Area Stormwater Management Agencies Association (BASMAA)<sup>1</sup> appreciates this opportunity to comment on the Baseline Trash Loads (Generation Rates), Trash Load Reduction Tracking Method, and Short-Term Trash Loading Reduction Plans submitted to you by February 1, 2012.

As you are aware, the local stormwater quality agencies worked diligently since the Municipal Regional Permit (MRP) was adopted in October 2009 to develop the submitted information. The work was carried out collaboratively among local agencies and in cooperation with your staff and stakeholders. We thank your staff for their helpful and attentive participation in the BASMAA Trash Committee and other discussions leading to the submittals.

As you are also aware, much of the work conducted to develop the submittals was relatively groundbreaking and more expansive than efforts to-date, in for example, the Los Angeles region in response to its trash TMDLs (total maximum daily loads). BASMAA and the local stormwater quality agencies sought, compiled, reviewed, and used information from a variety of sources from the Bay Area to international for information on trash generation and load measurement for the loads report, and across the full range of treatment and source control best management practices (BMPs) for the tracking method report and short-term reduction plans. As a result, we believe the resulting reports and plans represent the state-of-knowledge on trash control in municipal storm drain systems.

However, we also recognize that although litter has been a problem for many decades, the science of controlling trash entering storm drain systems is relatively young. And of course, when it comes to monitoring stormwater, we face the same significant challenges with trash that we face with all stormwater pollutants of concern to detecting changes as a result of management actions. Accordingly, our reports and plans are relatively preliminary, and we expect to refine them as we gather and assess more data and information.

Bay Area

Stormwater Management

Agencies Association

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Menlo Park, CA 94026

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<sup>1</sup> BASMAA is a 501(c)(3) non-profit organization comprised of the municipal stormwater programs in the San Francisco Bay Area representing 96 agencies, including 84 cities and 7 counties. BASMAA is focused on regional challenges and opportunities to improving the quality of stormwater that flows to our local creeks, San Francisco Bay and Delta, and the Ocean.

In that regard, we appreciate the initial feedback your staff has provided and look forward to receiving any additional feedback as soon as possible. We expect at that time to work out a plan and schedule for potential revisions.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Brosseau", with a long horizontal flourish extending to the right.

Geoff Brosseau, Executive Director

cc: Tom Mumley, Assistant Executive Officer, San Francisco Bay Regional Water Board  
Dale Bowyer, San Francisco Bay Regional Water Board  
BASMAA Board of Directors