



Protecting Alameda County Creeks, Wetlands & the Bay

July 10, 2015

Transmitted via email: mrp.reissuance@waterboards.ca.gov

Dear Dr. Mumley:

By email dated May 11, 2015, the Water Board indicated it would accept written comments on the Draft Municipal Regional Stormwater Permit (Draft MRP) until 5 pm on July 10, 2015. It was requested that written comments be submitted to the following email address: mrp.reissuance@waterboards.ca.gov and that all attachments to the email should be submitted as one electronic file with a file name clearly identifying the commenting entity. In response to this Water Board notice, I am filing these comments on behalf of the Alameda Countywide Clean Water Program (ACCWP) with attachments in the form requested.

Thank you for the opportunity to file these comments – we appreciate all the time that you and your staff have taken to meet with us and other MS4s in an attempt to reach agreement on this very complex next phase of the MRP. Our comments on the highest priority issues are below. Additional specific comments on these and other provisions are included in the attached table.

Provision C.12: Polychlorinated Biphenyls (PCBs) Control

Provision C.12.a: The 0.5 kg/yr and 3.0 kg/yr PCB load reduction performance criteria should be removed. Compliance should be determined based upon implementation of specified control measures.

- 1) There is no reasonable certainty regarding the ability of best management practices (BMPs) to meet the proposed load reduction performance criteria. The Fact Sheet acknowledges that achievement of the performance criteria is speculative at this stage of load reduction methodology, and describes a default approach to estimating load reductions resulting from foreseeable control measures implemented during the permit term. Most of the BMPs evaluated during MRP 1 that were thought to have promise turned out to have very limited load reduction benefits. For example, it was thought that enhanced street sweeping and drop inlet cleaning, and diversion of stormwater flows to sanitary sewers, would be able to achieve significant reductions in PCB loads. Further study during MRP 1 has determined that this is not the case.

399 Elmhurst St.
Hayward, CA
94544
p. 510-670-5543

MEMBER AGENCIES:

Alameda
Albany
Berkeley
Dublin
Emeryville
Fremont
Hayward
Livermore
Newark
Oakland
Piedmont
Pleasanton
San Leandro
Union City
County of Alameda
Alameda County Flood
Control and Water
Conservation District
Zone 7 Water Agency

Only two BMPs as more fully discussed below currently appear to have the potential to significantly reduce PCB loads: source property identification and remediation, and managing PCB containing waste during building demolition. However, lack of reliable data and Permittees' inability to control all aspects of implementation mean there is no reasonable certainty that the stipulated load reductions could be achieved.

Source Property Identification and Remediation: Through previous investigations, Permittees have identified several sites in old industrial areas with significant PCB contamination. Based upon this finding, we are currently conducting a screening of all old industrial parcels throughout the County, and conducting PCB analysis of sediment adjacent to the sites that appear to have the highest likelihood of being a PCB source property. Through this process we may find some sites that are significant sources of PCBs. However, the number of sites will probably be relatively low, and it will be difficult or impossible to develop an accurate estimate of the annual load of PCBs from these sites in advance of their investigation and remediation under the direction of appropriate state and federal agencies.

Managing PCB Containing Building Demolition Waste: There are significant quantities of legacy PCBs in certain buildings (an estimated 4.7 kg average in 1950 to 1980 masonry/concrete structures), but the amount of PCBs released to the storm drain system during demolition is completely unknown. Permittees have conducted an extensive literature review in an effort to develop a reasonable estimate. There is very little published data, a wide range of estimates that rely on personal judgment for key assumptions, and no studies of PCBs released from building demolition to storm water runoff. Developing an accurate estimate within several months (April 2016) or even several years is infeasible given the wide variation from site to site in the mass of PCB containing hazardous waste, the concentration of PCBs, the types of waste, the type and size of structure, the control BMPs implemented, and the type of demolition. The proposed 3 kg/yr load reduction relies heavily on the assumed load reduction from managing building demolition waste. This assumption is unfounded and cannot form the basis for a regulatory PCB load reduction requirement.

2) The Draft Permit states that Permittees need to develop an allocation scheme or the default will be by population. Neither option is feasible. There are several problems with developing an alternative load allocation among Permittees in addition to the unrealistic timeframe (i.e., April 2016): (1) There is no legally binding mechanism to reallocate loads that would assure permit compliance to all parties; and (2) Permittees whose allocation would rise under an alternative allocation could not agree to a higher allocation and put their jurisdiction in jeopardy of non-compliance when there is no certainty regarding meeting the target. In addition, a population-based allocation is not feasible as some of our newer cities (e.g., Dublin, Pleasanton, Livermore, Fremont) have relatively large populations and very little old industrial or old urban (pre-1980) development and

therefore, very little opportunity for PCB reduction credit through either building demolition (C.12.f) or Green Infrastructure implementation (C.12.c).

3) PCB load reductions are not required by the PCB TMDL. The TMDL Implementation Plan states that PCB reductions should be evaluated after 10 years (i.e., 2020). In 2020, after MRP 2 requirements have been completed, we will have a much better understanding of what can be achieved and through which combination of control measures and will have provided updates to the initial load estimation methodologies. Load reduction targets could then be set at that time.

The permit needs to provide Permittees with a clear and feasible path to achieving compliance based on implementation of PCB control programs described in C.12 that can realistically be planned, that have predictable removal outcomes, and that would be completed during the permit term. Therefore, the load reduction targets should be removed, especially the 0.5 kg/yr criterion for the second year of the permit, which is unnecessary and burdensome.

If the 3.0 kg/yr performance criterion for the permit term is retained, it should be explicitly stated in the form of an action level to avoid any confusion between the permit's performance metrics and effluent limits; clarifying this legal definition has important implications for enforcement and the risk of potential third party lawsuits. See the legal comments of our attorney, Gary Grimm. Also, the Permit Fact Sheet should fully describe the default interim accounting method for all of the proposed PCB control measures.

Provision C.12.b: Revise documentation approach for interim load estimation methodology. If submittal is required, allow at least twelve months after the permit adoption, especially if documentation of load estimation methodology is required.

The Tentative Order notes that the “full description of measurement and estimation methodology” required in this provision is intended as a documented version of the default interim method in the Fact Sheet, applicable to this permit term. In conjunction with the above requested changes in C.12.a, this submittal should be deleted as unnecessary, since a description of a permanent method will be provided before the end of the permit per Provision C.12.b.iii(3). If load reduction targets are retained, the Fact Sheet should document all of the parameters and assumptions involved in this method, which BASMAA representatives provided to Water Board staff in summary form.

Provision C.12.f: Managing PCBs waste in building demolitions should be part of a comprehensive federal and State effort to close gaps in the existing regulatory structure, and recognize limits to Permittee jurisdiction.

1) Permittees are willing and able to partner with other agencies in this effort but cannot be the leads for implementing necessary upgrades or interpretations to federal and state PCB regulations. The Draft Permit recognizes that working with state and federal agencies is necessary to create a coordinated program for management of PCB-containing building materials, like those successfully implemented for asbestos or lead-based paint. ACCWP Permittees and other municipalities collaborated with the San Francisco Estuary Partnership's PCBs in Caulk Project, which identified gaps in existing information and regulatory approaches to PCBs in existing buildings. Permittees can encourage proponents of demolition projects to abate PCB containing materials in accordance with existing regulations but cannot pre-empt or anticipate future federal and state regulations.

2) Discussions with Water Board staff indicate that USEPA Region 9 contacts overseeing PCB clean-ups will not commit to timely review or response of proposed abatement plans for projects with PCB-containing building materials, if Permittees were to require documentation of abatement plan submittal to USEPA prior to issuing demolition permits. Such uncertainty and wasted efforts would expose the projects to highly uncertain time and cost impacts.

3) The Fact Sheet lacks clarity regarding the default assumptions used to estimate potential load reductions associated with this provision, which are subject to large uncertainties due to lack of published data on release to runoff of PCBs in building materials or from demolition activities. USEPA has not shared results of recent clean-ups or research which would inform updated guidance and best practices, nor made any statements on whether demolition activities will be addressed in its PCB rulemaking process (originally announced in 2010).

Permit language should recognize that a truly comprehensive framework will take longer than 3 years and that Permittees have no control over the participation or action timelines of federal, state or regional agencies.

Provision C.10. Trash Load Reductions

1) The schedule for meeting the 70% and 100% trash reduction targets should be extended.

Permittees have made a great deal of progress over the last 5 years in trash load reductions. However, we are still determining which BMPs are most effective as reductions are often variable and difficult to quantify. Therefore, informed decisions regarding the most effective expenditure of public funds cannot be made until more certainty regarding which BMPs will lead to full compliance. For example, through the Capturing California Trash Grant, BASMAA is conducting a study to determine if retractable drop inlet screens in combination with frequent street sweeping has a comparable effectiveness to full trash capture devices. If

the BASMAA study shows full trash capture equivalence, using inlet screens in combination with street sweeping may be a more efficient approach to compliance due to reduced maintenance cost or they could be used in areas where full trash capture systems cannot be installed.

The reduction targets should be changed to July 1, 2020 for a 70% reduction and July 1, 2025 for 100% reduction. The 2025 deadline is consistent with the Statewide Trash Plan. Even with time extensions, these are still extremely aggressive targets. A useful comparison is the State's requirements for reducing solid waste to landfills under AB939. AB 939 was passed in 1989 and required a 50% reduction in waste within 11 years (2000). As with trash, it was very difficult to establish a baseline even though the solid waste stream is much easier to measure than litter in the environment. Local and regional jurisdictions are now (26 years later) trying to achieve a 75% reduction. In addition, waste management agencies are not subject to the same funding constraints as stormwater programs are under Prop 218. Smaller, less-urbanized jurisdictions should more easily be able to achieve the reductions under the extended schedule. However, for larger and more heavily trash-impacted jurisdictions it may be impossible to achieve required reductions even within the extended timeframe.

Another reason to extend the compliance dates is that many of the highest trash problem areas are along Caltrans roadways. Permittees have existing maintenance agreements with Caltrans for many portions of Caltrans roadways. Caltrans has a stormwater permit requiring similar trash load reductions, and Caltrans is interested in partnering with Permittees to revise maintenance agreements and share in the cost of installation and maintenance of full trash capture devices along its roadways. Caltrans has until 2025 to meet its reduction targets under the Caltrans statewide permit. Given the differences in the timelines in the Tentative Order and the Caltrans permit, this makes it difficult to partner and collaborate with Caltrans on trash load reduction in this region. A revised schedule would also line up with Caltrans' schedule and make it much easier to coordinate with Caltrans.

2) Source Control (C.10.b.iv): The maximum offset allowed for source control actions should be increased to 15%.

The Alameda Countywide Storm Drain Trash Monitoring and Characterization Project demonstrated an 8% reduction from existing source control actions. Existing source control actions could be enhanced to reduce trash further, and additional source control actions could be developed. In addition, source control is much more effective and efficient approach to reducing pollution as compared to removing pollutants once they are in the environment. These source control efforts should be encouraged by increasing the maximum offset to at least 15%. Increasing this offset was strongly encouraged by many persons at the Water Board July 8th

hearing. These offsets should definitely be increased, encouraged, and not phased out in future years.

3) Additional Creek and Shoreline Cleanup (C.10.c.i): The cap on the maximum offset should be increased.

Municipalities spend a tremendous amount of resources to clean up trash from in and around local creeks and the Bay shoreline. This trash is directly impacting local waterways. However, the trash is often deposited along these waterways through mechanisms other than discharge from the municipal storm drain system. For example, with prevailing onshore winds coming from the west, East Bay shoreline locations see a majority of trash from Peninsula sources. Cleanup efforts are often the most effective approach to reducing trash impacts to waterways, and these efforts should be encouraged. The importance of these efforts was emphasized by many at the July 8th Water Board hearing. The maximum offset should be increased to at least 20%.

4) Visual Assessments should not be used to determine compliance.

The Visual Assessment Protocol has not been vetted sufficiently to be used as a Permit compliance tool for the following reasons: 1) The temporal and spatial variation is not well understood or quantified; 2) There is an element of subjectivity to the assessments that cannot be eliminated; 3) The definitions of generation rate categories (i.e., Very High, High, Moderate, and Low) are too broad to detected actual trash reductions in many cases; and, 4) How to account for variations from one assessment to the next has not been determined. Conducting visual on-land assessments is time consuming; drawing staff and finite resources away from actual trash reduction efforts that directly improve water quality. Visual assessments should be used for only qualitative assessment during this permit term.

5) The requirement to map all private property down to 5,000 sq. ft. in moderate or higher trash generation areas should be deleted.

This mapping would require a tremendous resource intensive effort without any clear benefit. It is often nearly impossible to determine how storm drains are plumbed at older developments. Maps of these private storm drain systems are hard to obtain and often non-existent or inaccurate. This requirement should be deleted.

6) The Receiving Water Observations requirement (C.10.b.v) should be removed.

Conducting receiving water observations is another requirement that will take significant resources without any clear benefit and will result in the diversion of resources from trash reduction efforts. No protocols have been established and there is tremendous variation in the amount of trash from site to site and over time depending on the timing and size of storm

events. It is not clear that the data produced from this effort could guide future management actions.

Through the Tracking California Trash Grant, BASMAA is working with Five Gyres to develop a protocol for sampling and quantifying trash discharged during storm events. The receiving water monitoring requirement should be removed from this permit and reconsidered once a protocol has been established. We also recommend that receiving water observations be used solely as trend monitoring of trash in the environment and not for compliance determinations.

Provision C.3.j. Green Infrastructure

1) The schedule for developing the Green Infrastructure framework (C.3.J.i) should be extended to 24 months from the Permit effective date.

The new Green Infrastructure approach and requirements are very comprehensive, will require significant financial resources, and will require in-depth discussion and planning efforts by local agencies over upcoming years. These efforts will significantly affect many areas of municipal government. Stated differently, this will be a major commitment for Permittees extending many years into the future.

It should be assumed that most Permittees will need to have the framework approved by their governing bodies rather than the city or county manager. Also, with many Permittees having multi-year adopted budgets, time must be given to source and allocate the funding mechanisms, and then include in the next round of budget adoption. The requirements of the framework are extensive. Developing a framework for approval by a governing body will require significant time and resources, and coordination and cooperation among various agencies with often conflicting priorities and constraints. The schedule for completion must be extended to 24 months from the Permit adoption in order to do this meaningfully and effectively.

2) Provide more flexibility for sizing treatment controls at road projects (C.3.j.1.g.).

Provision C.3.j.1.g requires public projects (e.g., roadway projects) to meet the C.3.d sizing criteria. The C.3.d. sizing requirement generally requires that the treatment system is about 4% of the area draining to the treatment system, has a minimum infiltration rate of 5 inches per hour, and has a specified type and depth of soil and gravel. As was learned through the Green Streets pilot projects required under the current permit, that standard is often impossible to achieve.

Roadway retrofit treatment projects are often highly constrained due to competing needs for space such as pedestrian and bicycle traffic, as well as underground utilities. There is also

often a large amount of runoff from adjacent private parcels that cannot be limited or diverted. The minimum 5 inch per hour infiltration rate will also preclude the planting of trees in the treatment area as trees need a slower draining soil (e.g., 3 to 4 inches per hour). Municipalities will want to include trees within their green streets projects, and they should be able to include tree wells within their treatment calculations. The requirement to meet the C.3.d sizing criteria will result in less treatment within roadway retrofit projects as the criteria will often not be possible to meet.

Greater flexibility should be included in the permit. The allowance for all Permittees to provide a single alternative approach is not feasible as local conditions and constraints vary among jurisdictions and across the region. At a minimum the provision should be revised to allow countywide programs to submit an alternative approach.

Reporting

Reporting on two permits in one Annual Report is difficult and confusing. Many permit requirements are based on implementing requirements on a July 1 through June 30 implementation schedule. If a new permit with revised annual requirements becomes effective after July 1, it's not clear what portion of, if any, of those annual requirements needed to be implemented during the less than one year period of the old and new permit. To avoid this problem, one solution is to make the effective date of the new permit July 1, 2016. The schedule for completion dates could take into account the Permit adoption date as Permit adoption provides certainty.

It should be noted that these comments are provided solely to assist the Water Board's consideration of and potential reaction to concepts or language it may, in its discretion, elect to advance relative to the reissuance of the Municipal Regional Permit for stormwater discharges. It is not intended and should not be misconstrued as an offer to take on, or volunteer for, any potential permit requirement that represents a new program or higher level of service relative to the MRP or its predecessor permits.

Sincerely,



James Scanlin, Program Manager

Attachments: Table 1: Additional Specific Comments
Table 2: Proposed Revisions to Provision C.7: Public Outreach
Table 3: Initial Response to Issues Raised at July 8 Board Hearing

cc: ACCWP Management Committee Representatives

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

Provision	Issue	Suggested Revision
General Comment	<p>Numerous time schedules and submittal compliance dates are too soon, and do not allow the Permittees to sufficiently prepare and internally review the required documents and submittals. As a complicating factor, the permit predicted adoption date and effective date is uncertain and keeps changing. Further, the specifics of the requirements are not known at this early date and cannot be fully known until MRP 2 is adopted by the Water Board. Thus, due to local agency legal requirements as well as municipal policy considerations, Permittees cannot commit or prepare to comply until the new MRP is in effect. It is not reasonable to take the view that once Permittees are put on notice of potential new requirements and timelines in drafts, that they should be moving forward with the new projected timelines in mind – this is erroneous in that the only requirements that apply prior to MRP 2 adoption are those contained in the current MRP.</p>	<p>To address this significant concern, we suggest that any time schedules and submittal dates in the drafts or Tentative Order should be established with a specific and stated projected adoption date in mind, and then if the adoption slips beyond that date or happens at an earlier date, all time schedules and submittal dates would be adjusted accordingly. Another alternative would be to do as the Water Board often does in Site Cleanup Orders by setting deadlines and submittal dates within a certain number of months after permit adoption, rather than specifying actual calendar dates. Then the reasonableness of the deadline can be effectively assessed.</p>
General Comment	<p>There are a number of requirements for “Permittees” that are not applicable to flood control districts.</p>	<p>Change to “population-based Permittees” where applicable.</p>
C.2.f.ii.2	<p>Only 10 days are allowed for corrective action.</p>	<p>The ten-day timeframe should be extended to 30 days.</p>
C.3.b: project size threshold	<p>We support the proposal to retain the existing thresholds of impervious surface for Regulated Projects (i.e., 10,000 sq. ft. and 5,000 sq. ft. for certain projects)</p>	<p>Keep as is.</p>
C.3.b: 50% rule	<p>Most of the redevelopment projects result in a reduction in the overall amount of impervious surface, and have other environmental benefits as well. The 50% rule acts as a disincentive to do these environmentally beneficial infill</p>	<p>Delete this provision.</p>

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

	projects because it is often very challenging to install measures to treat runoff from areas not being modified by the project.	
C.3.d.iv: "Grand-fathering"	We do not support the proposal to change the grandfathering clause such that projects not under construction are subject to the new permit requirements. Private and public projects are conceived of, financed, and designed with the existing regulations in mind. Changing regulations at the point that a project is about to be constructed can prevent an otherwise environmentally beneficial project from happening. Furthermore, grandfathered projects represent a small amount of regional impervious surface.	Revise to provide greater flexibility. Also, following language should be added to the end of C.3.d.iv (Due Date for Implementation): "unless the development project has their own regional order from the Water Board. If there is an existing order that is still valid, the project shall follow the guidelines of that order."
C.3.e.vi: Reporting on Special Projects	The purpose of the Special Projects provisions, per the language in the permit, is to incentivize projects that are beneficial at a watershed scale. Requiring Special Projects to first demonstrate LID infeasibility does little to incentivize these projects.	Revise provision to make reporting less burdensome.
C.3.h.ii.6: O&M Inspection Plan	The requirements for the O&M Plan are unnecessarily burdensome.	Suggested Revisions: 1) Remove requirement to inspect impervious surface installations. 2) Remove the requirement for 20% of treatment systems to be inspected every year. 3) Require all treatment systems to be inspected at least once every 5 years.
C.3.i. Small Projects	We support the proposal to retain the existing provisions concerning small projects.	Keep as is.
C.7: Public Outreach	The provision contains very specific requirements that may turn out not to be the most effective approach.	A proposed alternative approach that allows greater flexibility while still ensuring that the outreach will be effective is attached.

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

C.8.d Subsection numbers	C.8.d.i is used twice (for biological assessment and chlorine)	Renumber C.8.d subsections up through c.8.d.vii
C.8.d.ii(4) Temperature triggers	Temperature trigger definition is based on non-California studie, does not acknowledge other environmental factors affecting variation in salmonid sensitivity to temperature.	Need to include references to existing watershed specific temperature thresholds developed through other regulatory processes (e.g., agreements with NMFS)
C.8.d.v Toxicity/Pollutants in Sediment - Table 8.2	Table includes several analytes with low benefit for ambient creek sampling in comparison to analytical costs, or are addressed by C.8.f	Delete PCBs, mercury and organochlorine pesticides from table
C.8.d.v(4)(c) Toxicity/Pollutants in Sediment Follow-up	MRP 1.0 results show trigger criterion for pollutants without WQOs is too conservative when "results exceed Probable or Threshold Effects Concentrations"-- should only consider follow-up when results exceed Probable Effects Levels (PECs)	Delete "or Threshold Effects Concentrations"
C.8.e.ii(1) and (2) - Stressor ID	Statements requiring "minimum of one [project] for toxicity" assumes there will be at least one toxicity threshold exceedance in the region or county. Also overly constrains selection of regional projects.	Delete requirement (preferred) or add qualifying text or footnote that this would only apply when at least one qualifying toxicity threshold exceedance appears on the list required by Prov. C.8.d.i)
C.8.e.iii(1) initiation of SSID projects	Provision requires at least half of SSID projects to be initiated by 3rd year, making project selection rely more heavily on data generated during the previous permit term or in years 1-2 of this permit.	Delete requirements or state that initial workplans based on first 2 years can be modified in Year 3 of permit.
C.8.e.iii(1)(f) SSID toxicity studies	Provision requires Toxicity Identification Evaluation (TIE) when no chemical pollutant is associated with the sample, skipping Toxicity Reduction Evaluation (TRE) as possible initial step. This skips a cost effective step that could potentially eliminate the need for a TIE which has a high likelihood of failure in cases of moderate toxicity.	Reinstate TRE option by incorporating text and references footnote from the existing MRP provision C.8.d.i(1).
C.8.e.iii(2) completion of SSID projects during permit term	Requirement to "complete all steps for half of the required SSID projects" does not allow for possible multiple iterations of control actions and evaluation, or the difficulty of	Delete second sentence and replace with: "The Permittees shall attempt to complete Steps 1 and 2 for half their required

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

	determining effectiveness for episodic exceedance conditions. Also the second sentence regarding intent of provision is more appropriate to introduction of provision than this particular step. This provision should refer to completion of Steps 1 and 2 (SSID workplan and investigation), not all of the Step 3 follow-up actions.	SSID projects, at a minimum, during the permit term".
C.8.e.iii(3)b Completion of SSID project	Written concurrence of Executive Officer should not be required to determine an SSID project is completed, especially when the Permittee has determined MS4 systems are not contributing to an exceedance.	Delete requirement for Executive Officer approval, and instead state that the Permittee's determination will be highlighted in the reporting project status per C.8.e.iv.
C.8.e.iii(3)c Completion of SSID project	In first line, "inclusive" appears to be a typographical error. Concurrence or approval should not be required for determination of completion	Replace "inclusive" with "inconclusive" and revise second sentence per above comment on C.8.e.iii(3)b.
C.8.f.ii- Table 8.4 Number of Pollutants of Concern samples	Table 8.4 shows numbers in parentheses for yearly minimum number of samples of each of the listed pollutants or pollutant groups. This is overly restrictive, particularly for the pollutants listing only 1 or 2 samples per year, since it may be both more cost-effective and a stronger sampling design to group a larger number of samples in some years while sampling none in others.	Delete minimum annual number or add footnote that states this number may be averaged during first 2-3 years of permit and is not required for later years after the required total number of samples has been achieved.
C.8.f.iii Table 8.5 Pollutants of Concern analytical methods	Table 8.5 requires 40 PCB congeners be analyzed using USEPA method 1668. While the February 2008 PCB TMDL Basin Plan Amendment Staff Report recommended this method as a basis for future data collection <u>in the Bay</u> to "facilitate data comparability for long-term trend analysis" (Section 4.4), it also notes that PCB concentrations in different sample matrices can vary widely. Method 8082A is acceptable to SWAMP and is being used for congener analyses that provide sufficient resolution for current stormwater POC	Revise Table 8.5 Laboratory Analytic Methods for PCBs to also allow congener analyses by other USEPA methods including 8082 (possibly also 8270D modified by Method 1625), when appropriate for addressing management information needs (#1 and #3 as a minimum) as documented in the annual POC Monitoring Report per C.8.g.iv. Consider also adding a footnote to clarify

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

	<p>monitoring related to this provision's management information need #1 (Source Identification). Also, the second sentence in provision erroneously refers to "Table 8.2"</p>	<p>reference to the "RMP 40" congener list. Also, correct table reference in second sentence to "Table 8.5".</p>
<p>C.8.g.iv Pollutants of Concern Monitoring data submittal</p>	<p>This provision's last sentence requires submittal by October 15 of data types not accepted by CEDEN, collected during the previous Water Year which ends on September 30. This is an unrealistic timeframe for data collected during the last 3 months of the Water Year, especially involving analysis of PCB congeners.</p>	<p>Change date for submittal of non-CEDEN data to March 15, which will be consistent with the reporting requirements in the rest of C.8.g.</p>
<p>C.10.b.i.a. full trash capture system maintenance</p>	<p>This provision specifies maintenance frequencies based upon the trash generation rate of the surrounding land use. This is not the best approach as other factors such as the size of the catch basin, the number and type of trees in the area, and weather are more relevant factors.</p>	<p>Permittees should be given the flexibility to determine the appropriate frequency of cleaning with documentation of adequacy. For example, "inspect, and clean as necessary, all FTC devices at least once per year. Devices greater than 50% full when inspected will be cleaned more frequently."</p>
<p>C.10.b.ii.b. Non-full trash capture Assessment</p>	<p>The draft permit requires on-land visual assessment of all Non-FTC management areas. The proposed visual assessment method is not appropriate for all types of trash reduction measures. The visual assessment protocol is designed for use along the road surface, curb, and sidewalk of public right-of-way. It is not designed to be used on areas such as a parking lot of a large shopping center, or to assess trash management in and around commercial dumpsters.</p>	<p>This provision should be revised to allow other types of assessment.</p>
<p>C.10: full trash capture equivalence</p>	<p>The Permittees are currently evaluating combinations of management actions (e.g., street sweeping in combination with retractable inlet screens) to assess equivalency to full trash capture. If these prove to be equivalent, they should be allowed under this permit.</p>	<p>Revise to allow for FTC equivalent actions to be accepted.</p>

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

C.12 PCB Load reductions for stormwater (also applies to C.11)	Introductory paragraph for C.12 should clarify that only a portion of the stormwater load and waste load allocation (20 kg/yr and 2 kg/yr respectively) aggregated for the entire region apply to the Permittee jurisdictions.	Clarify that per the PCB TMDL the aggregate load and waste load allocation for Permittees are 14.4 kg/yr and 1.6 kg/yr respectively.
C.12.a Load reduction performance criteria for compliance	Load reductions numbers are not required by the TMDL, and may be subject to misinterpretation as numerical effluent limits	Delete Table 12.1 and all text references to numerical load reduction targets, especially the 0.5 kg/yr criterion for the second year of the permit. Any numerical performance criteria remaining in this provision should be explicitly stated in the form of an action level. State that compliance will be determined based on implementation of control measures (if necessary these should be associated with the action levels per comments below).
C.12.a.ii and C.12.b.iii(1) Permittee-specific load reductions	Requirement that Permittees submit a Permittee-specific allocation scheme is infeasible and lacks a legal mechanism binding among the Permittees	Delete this requirement from permit; if retained change submittal date to at least 12 months after adoption date.
C.12.a.iii Reporting and submittal dates (also applies to C.11.a.iii)	Submittal dates for initial lists of watersheds and control measures are too early, especially but not limited to Permittees reporting committed construction milestones for implementing control measures.	Revise submittal dates to at least 12 months after adoption date for C.11/12.a.iii(1) and subsequent Annual Report for C.11/12.a.iii(2)
C.12.b.iii Reporting dates for load estimation methodology and control measures (also applies to C.11.b.iii)	Provision C.12.b.i notes that the measurement and estimation methodology to be applied during the permit term is a default interim method and lists some of the assumptions used to estimate projected load reductions for each control measure (previously provided by BASMAA representatives). However the Fact Sheet omits key assumptions and parameters regarding load estimation for PCBs in demolition	Eliminate C.11/12.b.iii requirement for April 2016 submittal of documentation for the interim load assessment methodology. Include all parameters and assumptions for this methodology in the Fact Sheet. (BASMAA representatives will work with Water Board Staff to provide comparable information for mercury). Otherwise, revise

Table 1: Attachment to ACCWP
Comments on MRP 2 TO
Additional Specific Comments

	<p>wastes, while suggesting that this control measure could provide a significant level of PCB load reduction. Requiring formal documentation of these early in the permit is an unnecessary exercise and efforts should be focused on refining the method for use in subsequent permit terms, per C.11/12.b.iii(3) in conjunction with changes requested for C.12.a</p>	<p>submittal dates to at least 12 months after adoption date for initial method documentation and subsequent Annual Report for estimated load reductions from control measures implemented up to that date and previously uncredited.</p>
<p>C.12.a,b (also applies to C.11.a,b) Reporting and submittal dates</p>	<p>Reporting starting dates for initial list of watersheds and control measures are too early and have little relation to when the permit will actually be adopted. Reporting milestones for C.12.a are too close together in relation to each other as well as with the C.12.b accounting method for assessing load reductions. Annual calculations are an onerous effort that competes with effective implementation for scarce resources</p>	<p>If the present structure of C.12.a-b is retained, the reporting submittal milestones and intervals must be figured from the time of actual permit adoption and effective date. Milestones and reporting updates should be spaced farther apart.</p>
<p>C.12.c,d Green Infrastructure planning and implementation (also applies to C.11.c,d)</p>	<p>Provision C.12.c incorrectly assumes that PCB reduction concerns can drive the decisions of where initial Green Infrastructure projects and private redevelopment will result in greater load reductions, but siting of these improvements is subject to other factors not fully in in the Permittees' control. Reporting requirements in C.12.c-d are not fully coordinated with those in C.3.j, in particular regarding the 2019 Annual Report, which requires simultaneous submittal of Green Infrastructure Plans and the TMDL Implementation Plan. Also, the future time intervals for estimating cumulative long term load reductions per C.12.c.ii(2)(b-c) are different from those for impervious surface retrofit area as required by C.3.j.i(1)(c) thus unnecessarily increasing the number of planning analyses to be done.</p>	<p>Delete provisions C.11/12.c or at minimum remove Tables 11.1 and 12.2. Otherwise, allow at least an additional 6 months after submittal of Green Infrastructure Plan for Permittees to prepare additional analyses and conduct peer review for the Green Infrastructure aspects of the TMDL implementation plan, and align timeframes for future projections with those required in the plan submittals for C.3.j.</p>

Table 1: Attachment to ACCWP
 Comments on MRP 2 TO
 Additional Specific Comments

<p>C.12.f Manage PCB-containing materials and demolition wastes - general</p>	<p>As previously noted by BASMAA representatives, the MRP requirement that Permittees develop a framework for managing PCB-containing building wastes places undue burden on local agencies for a problem that should be addressed on a more comprehensive basis by state and federal agencies. Examples of workable regulatory approaches aligned with certification and other institutional infrastructure are those associated with the BAAQMD's permitting for demolition or renovation projects involving removal of asbestos, or DTSC's close-out process for projects involving lead-based paint, which both were developed in conjunction with federal regulatory initiatives.</p>	<p>Consider using Water Board and USEPA authority to develop a single required PCB removal permit for applicable demolition or renovation projects analogous to the protocols used by the BAAQMD or DTSC for projects involving removal of asbestos or lead-based paint.</p>
<p>C.12.f.ii(1) Implementation timeframe for managing PCB-containing materials and demolition wastes -</p>	<p>Despite recommendations arising from SFEP's PCBs in Caulk Project that standardized cleanup plans would greatly reduce the uncertainties facing applicants for demolition projects about time and cost required to comply with existing state and federal regulations regarding handling and disposal of PCB wastes. Development of such standardized plans would require cooperation of USEPA staff and is not wholly in control of the Permittees.</p>	<p>Revise the effective date of implementation to be set at a reasonable interval (e.g. 18-24 months) after USEPA approval of specific guidelines for standardized clean-up plans for the categories of projects to be affected.</p>

Table 2:
ACCWP MRP 2 Proposed Public Outreach/C.7. Revisions

MRP Provision	Current MRP Requirement	MRP 2.0 Update(s)
C.7. Public Information and Outreach	Each Permittee shall increase the knowledge of the target audiences regarding the impacts of stormwater pollution on receiving water and potential solutions to mitigate the problems caused; change the waste disposal and runoff pollution generation behavior of target audiences by encouraging implementation of appropriate solutions; and involve various citizens in mitigating the impacts of stormwater pollution.	Each Permittee shall increase the awareness of the target audiences regarding the impacts of stormwater pollution on receiving water and potential solutions to mitigate the problems caused; positively influence the waste disposal and runoff pollution generation behavior of target audiences by encouraging implementation of appropriate solutions; and involve residents in mitigating the impacts of stormwater pollution.
C.7.a. Storm Drain Inlet Marking	i. Task Description – Permittees shall mark and maintain at least 80 percent of municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message, such as “No dumping, drains to Bay” or equivalent. At least 80% of municipally-maintained storm drain inlet markings shall be inspected and maintained at least once per 5-year permit term. For newly approved, privately maintained streets, Permittees shall require inlet marking by the project developer upon construction and maintenance of markings through the development maintenance entity. Markings shall be verified prior to acceptance of the project.	Move to C.2: Permittees shall have a program to mark and maintain municipally-maintained storm drain inlets with an appropriate stormwater pollution prevention message, such as “No dumping, drains to Bay” or equivalent. Move to C.3: For newly approved, privately maintained streets, Permittees shall require inlet marking by the project developer upon construction and maintenance of markings through the development maintenance entity. Markings shall be verified prior to acceptance of the project.
	ii. Implementation level	Delete
	iii. Reporting	C.2: Report on implementation of the program once per permit term. C.3: Confirm that SD marking is verified prior to acceptance.

Table 2:
ACCWP MRP 2 Proposed Public Outreach/C.7. Revisions

MRP Provision	Current MRP Requirement	MRP 2.0 Update(s)
C.7.b. Advertising Campaigns	i. Task Description – Permittees shall participate in or contribute to advertising campaigns on trash/litter in waterways and pesticides with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target audience.	“i. Task Description – Permittees shall participate in or contribute to outreach campaigns with the goal of significantly increasing overall awareness of stormwater runoff pollution prevention messages and behavior changes in target audience.”
	ii. Implementation Level (1) Target a broad audience with two separate advertising campaigns, one focused on reducing trash/litter in waterways and one focused on reducing the impact of urban pesticides. The advertising campaigns may be coordinated regionally or county-wide. Permittees shall conduct a pre-campaign survey and a post-campaign survey to identify and quantify the audiences’ knowledge, trends, and attitudes and/or practices; and to measure the overall population’s awareness of the messages and behavior changes achieved by the two.	Permittees shall develop and implement an Outreach Plan (may be developed at the countywide or regional level) designed to meet the goals of C.7.b.i. The Plan shall include advertising, social media, media relations, community involvement/watershed stewardship, and participation in outreach events. The Plan will be implemented at the local, countywide and/or regional level.
	iii. Reporting.	Delete existing reporting requirements. Insert: Permittees shall report on the local, countywide, and regional implementation of the Outreach Plan in each annual report. At least once during the Permit term, Permittees will assess effectiveness of Outreach Plan implementation.
C.7.c. Media Relations	i. Task Description – Permittees shall participate in or contribute to a media relations campaign. Maximize use of free media/media coverage with the objective of significantly increasing the overall awareness of stormwater pollution prevention messages and associated behavior change in target audiences, and to achieve public goals.	Delete: covered under C.7.b.

Table 2:
ACCWP MRP 2 Proposed Public Outreach/C.7. Revisions

MRP Provision	Current MRP Requirement	MRP 2.0 Update(s)
C.7.d. Stormwater Point of Contact	i. Task Description – Permittees shall individually or collectively create and maintain a point of contact, e.g., phone number or website, to provide the public with information on watershed characteristics and stormwater pollution prevention alternatives.	Delete. Spill and complaint response covered under C.5.
C.7.e. Public Outreach Events	i. Task Description – Participate in and/or host events such as fairs, shows, workshops, (e.g., community events, street fairs, and farmers’ markets), to reach a broad spectrum of the community with both general and specific stormwater runoff pollution prevention messages. Pollution prevention messages shall include encouraging residents to (1) wash cars at commercial car washing facilities, (2) use minimal detergent when washing cars, and (3) divert the car washing runoff to landscaped area.	Participate in and/or host events such as fairs, shows, workshops, (e.g., community events, street fairs, and farmers’ markets), to reach a broad spectrum of the community with both general and specific stormwater runoff pollution prevention messages. Require planned effort to be included in the C.7.b. Outreach Plan. Minimum Events: Less than 100,000 = 1 100,000 to 250,000 = 2 Greater than 250,000 = 3
C.7.f. Watershed Stewardship collaborative efforts.	. Task Description – Permittees shall individually or collectively encourage and support watershed stewardship collaborative efforts of community groups such as the Contra Costa Watershed Forum, the Santa Clara Basin Watershed Management Initiative, “friends of creek” groups, and other organizations that benefit the health of the watershed such as the Bay-Friendly Landscaping and Gardening Coalition. If no such organizations exist, encourage and support development of grassroots watershed groups or engagement of an existing group, such as a neighborhood association, in watershed stewardship activities. Coordinate with existing groups to further stewardship efforts.	Delete. Covered under C.7.b. and C.7.g

Table 2:
ACCWP MRP 2 Proposed Public Outreach/C.7. Revisions

MRP Provision	Current MRP Requirement	MRP 2.0 Update(s)
C.7.g. Citizen involvement/ Watershed Stewardship	i. Task Description – Permittees shall individually or collectively, support citizen involvement events, which provide the opportunity for citizens to directly participate in water quality and aquatic habitat improvement, such as creek/shore clean-ups, adopt-an-inlet/creek/beach programs, volunteer monitoring, service learning activities such as storm drain inlet marking, community riparian restoration activities, community grants, other participation and/or host volunteer activities.	Combine with C.7.f. Require planned effort to be included in the C.7.b. Outreach Plan. Minimum Events: Less than 100,000 = 1 100,000 to 250,000 = 2 Greater than 250,000 = 3
C.7.h. School-Age Children Outreach	i. Task Description – Permittees shall individually or collectively implement outreach activities designed to increase awareness of stormwater and/or watershed message(s) in school-age children (K through 12). ii. Implementation Level – Implement annually and demonstrate effectiveness of efforts through assessment. iii. Reporting – In each Annual Report, each Permittee shall state the level of effort, spectrum of children reached, and methods used, and provide an evaluation of the effectiveness of these efforts.	Leave as is.
C.7.i. Outreach to Municipal Officials	i. Task Description – Permittees shall conduct outreach to municipal officials. One alternative means of accomplishing this is through the use of the Nonpoint Education for Municipal Officials program (NEMO) to significantly increase overall awareness of stormwater and/or watershed message(s) among regional municipal officials.	Delete.

Table 3:
ACCWP Initial Response to Issues Raised at July 8 Water Board hearing

Initial Response to Issues raised at July 8th Water Board Hearing

<p>Impact of Public Outreach</p>	<p>Public outreach can have a long-term impact on behavior. As Board Member Lefkovits mentioned, those who grew up with him still remember Smokey the Bear.</p> <p>ACCWP supports excellent environmental education programs for various levels of K-12 students: (1) Caterpillar Puppets: Grades K-3; (2) Storm Drain Rangers: Grades 4-5; and (3) Earth Team Zero Litter Project: High School. These programs can have an impact around the schools, but more importantly can have a long-term impact on students' attitude and behavior. A few examples of students' recent program-related artwork is attached.</p> <p>These programs would be happy to give a short 10-15 minute presentation at upcoming Board meetings if you like. When you see these programs you can't help but be inspired and believe that they have a long-term impact. These programs should be encouraged by being recognized as part of a trash reduction strategy.</p>
<p>Alternative Compliance Approaches</p>	<p>Board Members Lefkovits and Kissinger both raised the issue of the difficulty we have with measuring trash reductions. Board Member Lefkovits made the comment that there are things we think are valuable, but they are difficult to measure, and Board Member Kissinger remarked that we are good at end-of-pipe chemical measurements but not good at measuring trash reductions.</p> <p>Board member Kissinger suggested that alternative approaches to compliance were needed. ACCWP agrees and would appreciate the opportunity to develop alternative approaches through discussions with Water Board staff and or Water Board members.</p>
<p>Predictability</p>	<p>Board Member Kissinger raised the issue of the need for predictability. Board Member Lefkovits raised a similar issue of the lack of successful experience from other locations and the need to take a step back to evaluate BMPs.</p> <p>ACCWP agrees that more consideration is needed prior to moving forward with aggressive compliance targets. As an example, the staff presentation mentioned several best management actions Permittees could implement: increased street sweeping, especially to the curb; solar belly trash compactors; and volunteer cleanups. While these are all useful, they require significant resources and there is no guarantee that they will result in compliance with the Permit. Additional time is needed to come to agreement on how compliance can be achieved.</p>
<p>Trash Challenged Communities</p>	<p>The Permit should provide special consideration to trash challenged communities. The date for accomplishing a 70% reduction should be extended to 2020. Even with the extension, some communities will not be able to meet the deadline. In the MRP Steering Committee meetings, WB staff stated that special consideration would be given to "trash impacted" communities. The Draft MRP does not provide that consideration. The Permit should be revised to provide special consideration to trash challenged communities.</p>

Table 3:
ACCWP Initial Response to Issues Raised at July 8 Water Board hearing

K-12 Schools	K-12 Schools should be covered under the Phase II stormwater permit. Schools are often high trash-generation properties. Local jurisdictions have limited authority over schools. Some schools/districts are reluctant to host anti-litter education programs. The Water Board has the authority to have Region 2 K-12 schools covered under the Phase II stormwater permit. The Water Board should require at least litter reduction and anti-litter education under Phase II permits for K-12 schools.
BART	The WB should increase its regulatory oversight of BART under Phase II to ensure BART addresses litter at its stations and along its right-of-way. BART property is a significant source of litter. Jurisdictions have limited authority over BART. BART is covered already under the Phase II stormwater permit. The Water Board WB should require BART to increase its litter reduction efforts.
Caltrans	The Water Board should increase its regulatory oversight of Caltrans to ensure Caltrans addresses litter at along its right-of-way. Caltrans property is a significant source of litter. Local jurisdictions have limited authority over Caltrans property. Caltrans is covered under a statewide stormwater permit. The Water Board should require Caltrans to implement increased litter reduction activities.

From: **JOE LEON** joeleon@mac.com
Subject: Reminder: Clean-Up Club Survey
Date: December 3, 2014 at 5:31 PM
To: Lgotanco@K12.Ca.US



Dear Mr. Gotanco: We hope you had a good holiday. Just a quick reminder.....



Here is a link to the survey in case you need to make extras:

<https://www.dropbox.com/s/z4zempvh3pivgfq/School%20Litter%20Survey%20%28side%20one%29%20PRINT.pdf?dl=0>

And the back of the survey with the return address and fax number:

<https://www.dropbox.com/s/d7lbzifem3ufpb1/School%20Litter%20Survey%20%28side%20two%29%20PRINT%20B%3AW.pdf?dl=0>

Joe Leon, Caterpillar Puppets
2060 CasaGrande
Benicia, CA 94510
FAX: 1 (928) 543-3042

FINAL SUMMARY OF RETURNED SURVEYS AND COMMENTS FOR MR FROGGY'S
CLEAN-UP CLUB 2014-2015

62 shows were given at 29 Alameda County Schools.

36 1st Surveys were returned from 17 different schools

6 Principals responded to a reminder about the survey with comments

31 Follow-Up End-of-Year Surveys were returned including from three previously unresponsive to first survey schools. Two did not indicate the school they came from. All 25 responding Schools reported an increase in awareness of their students about the problems of school litter in the Follow-Up Survey

Four schools did not respond to the surveys: three in Berkeley, one in Pleasanton

Below are the individual school served and info on their teacher contact, surveys returned, comments and contacts

ALAMEDA 13 shows

Bay Farm School 4x 8:30, 9:15, 10:00, 10:45 450 students 200

Aughinbaugh, Alameda Contact: Bonnie Nelson-Duffey

TEACHER CONTACT: Ms. Lee-Chin.

1st Survey returned "Little Litter Everywhere"

Alameda Christian School 1x 9:15 50 students

226 Pacific Ave. Alameda, 94501 Contact: Ron Postma, Principal

TEACHER CONTACT: Ms. Le-Jesma, Ms. Postma, Ms. Rowton

3 1st surveys returned "almost litter free"

1 Follow-Up Survey "Litter free"

Teacher Comment: "Love the program."

Lum School 3x 8:30, 9:15 and 10:00 300 students

1801 Sandcreek Way Contact: Lawrence Gotanco, Principal

TEACHER CONTACT: Butler, Hare, Railto, Wold

4 Follow-Up Surveys Returned. "Little Litter Everywhere"

Principal e-Mail Comment " The show was great. It was hilarious. Thanks for coming out and teaching the kids"

St Philip Neri 1x 9:30 90 students

1335 High St. Alameda, 94501 Contact: Myra Keast, school secretary

TEACHER CONTACT: Hillenbrand

1 First Survey Returned. "Almost litter free"

Chinese Christian 1x 10:00 67 students

1801 North Loop Rd, Alameda, 94502 Contact: Julie Draper

TEACHER CONTACTS: Warek, Wong, Schumaker, Jeong

4 First Survey Returned "A little litter everywhere"

1 Follow-Up Survey "Almost litter free"

Comments. Thank you letters from 3 classes. Sample comment "I learned that bags look like jellyfish" Teacher Comment We just finished the recycling unit and the students are more aware

Ruby Bridges School 3x 1:00 2nd day 1:00 & 1:50 320 students

351 Jack London Ave, Alameda Contact: Teresa Barerra (cont.)

TEACHER CONTACT: Cine
1 1st Survey Returned. "Little litter Everywhere"
Principal e-mail comment: "A wonderful assembly"

ALBANY 3 shows

Ocean View Elementary 3x 9:00, 9:45 & 10:30 300 students
1000 Jackson St., Albany Contact: Terry Georgeson
TEACHER CONTACT: Choen

Student and Teacher Letters, Sample Comment "Thank you for teaching us that only rain should go down the storm drain. When we walked around our school we found 268 pieces of trash. This made me feel angry because everyone is not clean our school. I am going to try to protect our environment by leading by example and not littering"

BERKELEY 4 shows

Shu Ren International School 1x 11:30 75 students
1333 University Ave, Berkeley Contact: Simon Clark

Escole Bilingue 2x 1:15 & 2:30 200 students
1009 Heinz Ave. Berkeley Contact: Mirza Kopelman

Walden School 1x 1:15 60 students
2446 McKinley Ave Berkeley, Contact: Pamela Meredith

EMERYVILLE 2 shows

Anna Yates Elementary 2x 9:15 & 9:45 240 Students
1070 41st. Emeryville, Contact: Mary McGruder
TEACHER CONTACT: Connie Bi
1 First Survey Returned. "Almost Free of Litter"
Student Letter sample Comment "I learned about garbage and water"

FREMONT 8 shows

James Leitch Elementary 5X 8:30, 9:15, 10:20, 12:40, 1:40 650 students 47100
Fernald St, Fremont 94539 Contact: Ms. Mary Lee, Principal
TEACHER CONTACTS: LLoem, Blenis
2 First Surveys Returned. "A Little Litter is Everywhere"
Teacher Note Comment "Thank you for your puppet show. The children enjoyed it a lot. I liked how you included what is happening to the sea turtles. It was an important lesson.
Student (Scout) Comment. "We can't believe our scouts found 35 pieces of paper litter. In total of all the litter we ...found...we have 172 pieces of litter!"

Millard Elementary 3x 8:45, 9:25, 10:05 300 students
5200 Valpey Park Dr, Fremont Contact: Mark Persek
TEACHER CONTACTS: Plant, Poe
2 Follow-Up Surveys "Almost litter Free" (cont.)

(Millard comment cont.) Principal Comment at Litter Survey Reminder. "Not yet Litter Free" Thank you so much for getting back to me. We thoroughly enjoyed your puppet show and I am sorry to hear that none of the surveys got returned. Unfortunately Millard School is not yet a litter-free school, but we are working on it. I would say that it would take some time for more than one of two students to pick it all up. Some of the litter is ours and some happens after school and on the weekends by groups that are either using our school for sporting events, or just stopping by to play. We will continue our work in this area, and appreciate programs like yours that help to remind our students of how they can help in this area. We look forward to your return next year.

HAYWARD 4 shows

Bidwell School 2x 10:40, 11:10 150 students
175 Fairway St Hayward 94544 contact: Donna Marshall
TEACHER CONTACT: Krell
1 First Survey returned "A lot of litter everywhere"

Treeview School 2x 9:00, 9:55 150 students
30565 Treeview St. Hayward 94544 Contact: Cherrie Kihara
TEACHER CONTACT: Oskal and 2nd grade
3 Follow-Up Surveys returned "Almost litter free"
Teacher Note Comment "The students have been picking up litter and telling me about it."

LIVERMORE 1 show

Our Savior Lutheran Elementary 1x 10:00 60 students
1385 s. Livermore, CA 94550 Contact: eanwyl@oslm.net
TEACHER CONTACT: Poppe
1 First Survey Returned "Little Litter Everywhere"
Student letters and drawings.

NEWARK 4 shows

Milani Elementary 2x 8:30 and 9:15 225 students
37490 Birch, Newark Contact: Michelle Leipert
TEACHER CONTACTS: Leipert
1 First Survey Returned "A Litter Litter is Everywhere"
1 Follow-Up Survey Returned "A Little Litter is Everywhere"
Teacher Comment: "We need to do better about picking up Capri-Sun wrappers."

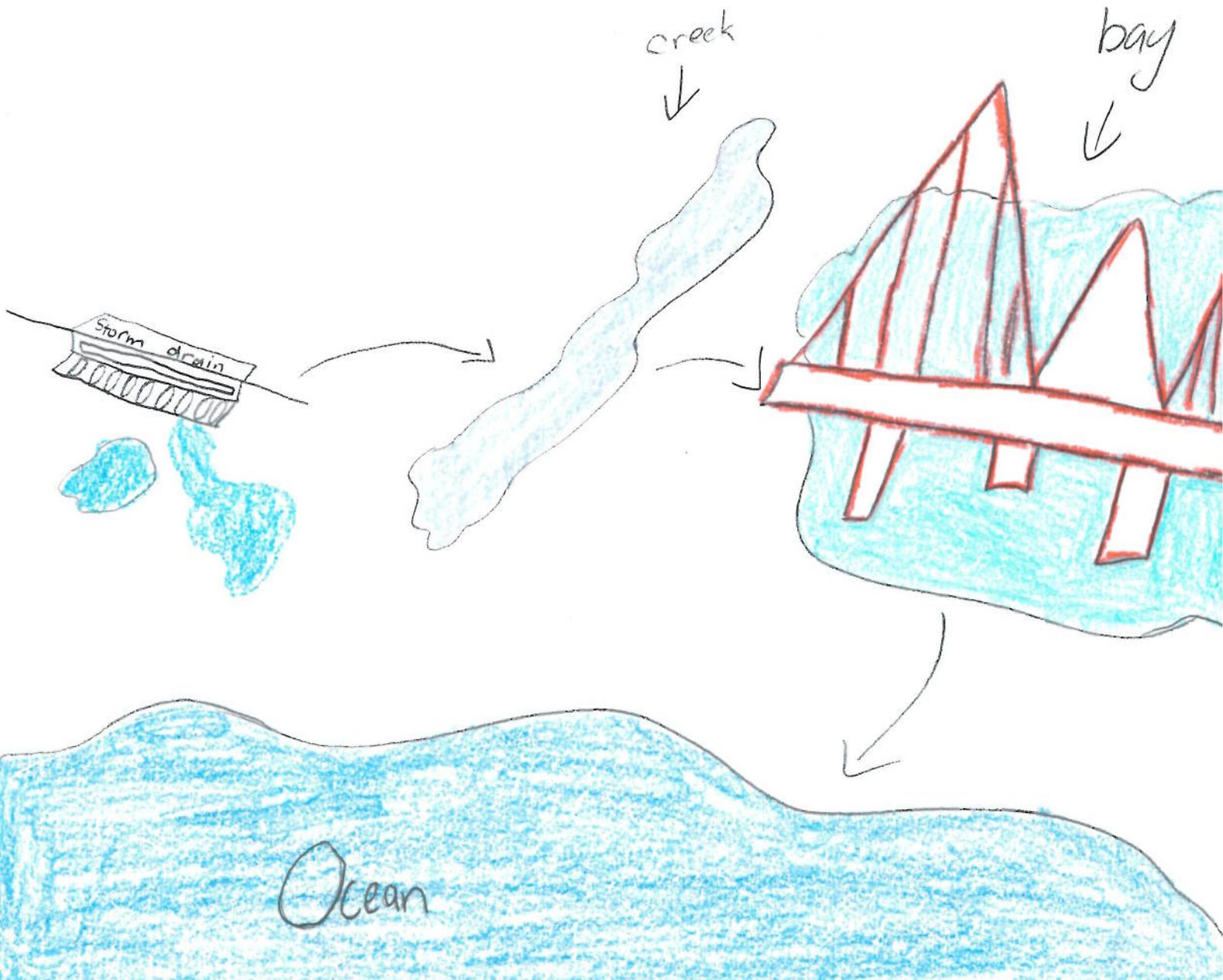
Kennedy School 2x 8:30 and 9:15 210 students
35430 Blackburn Dr. Newark 94560 Contact: Tammy Lobato
TEACHER CONTACT: Chavez
1 First Survey Returned "A Litter Litter is Everywhere"
1 Follow-Up Survey Returned "A Little Litter is Everywhere"

OAKLAND 4 shows

St Martin De Pores 1x 11:00 75 students
675 41st street, Oakland 94609 Contact: Nubia Giles

Shannon Wong

I learned that trash goes through the storm drain then, the creek then, the bay and last, it goes to the ocean. If the trash is plastic bags and if it goes to the ocean animals like turtles will think it is jellyfish and eat it they will be sick and die.



Jim Nguyen

Don't Litter!

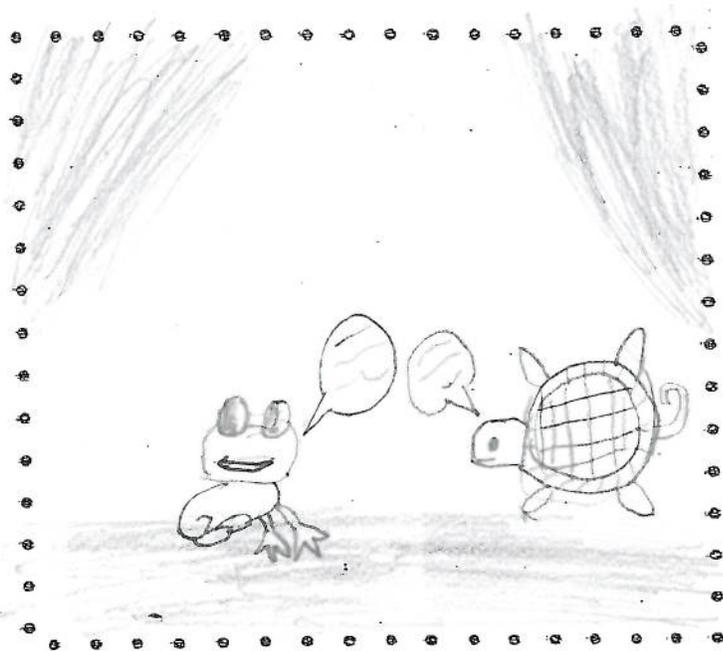
My 1st picture is showing people throwing trash in the storm drain. The 2nd picture is showing people throwing trash in garbage cans

don't do this

do this



Dear Mr. Froggy,

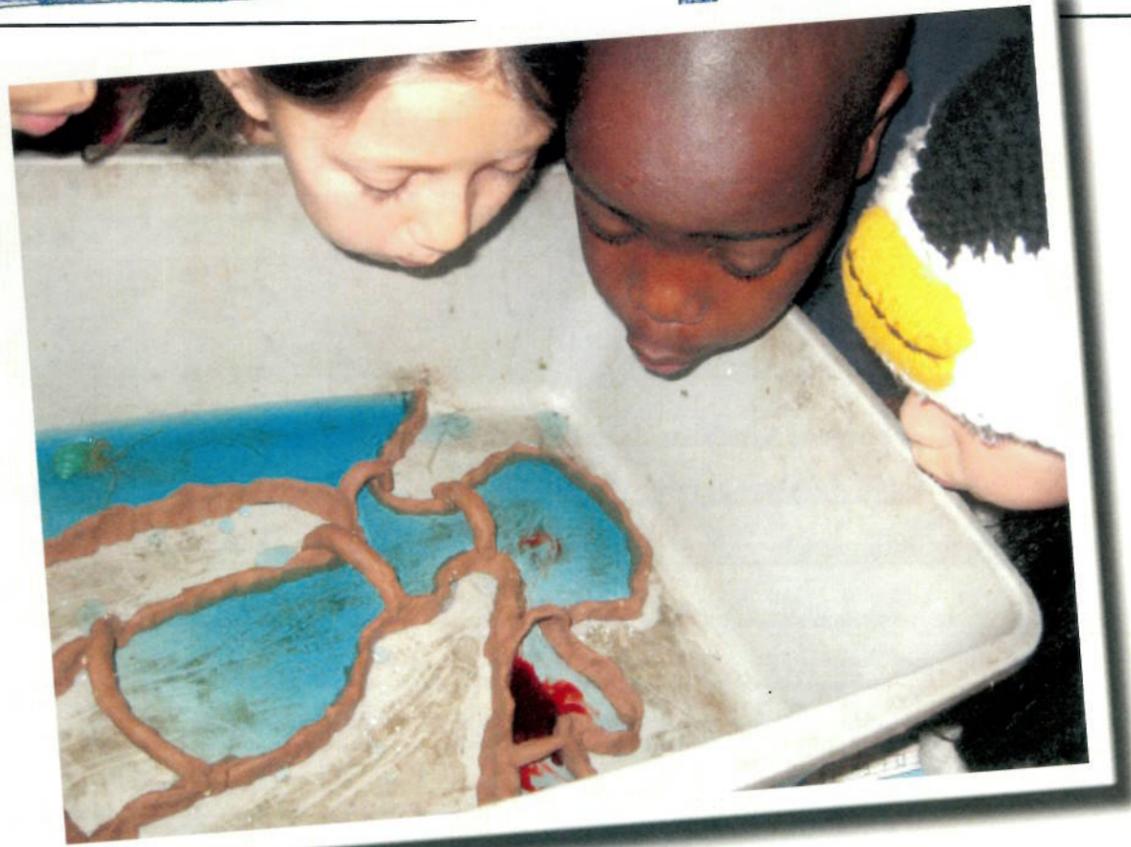
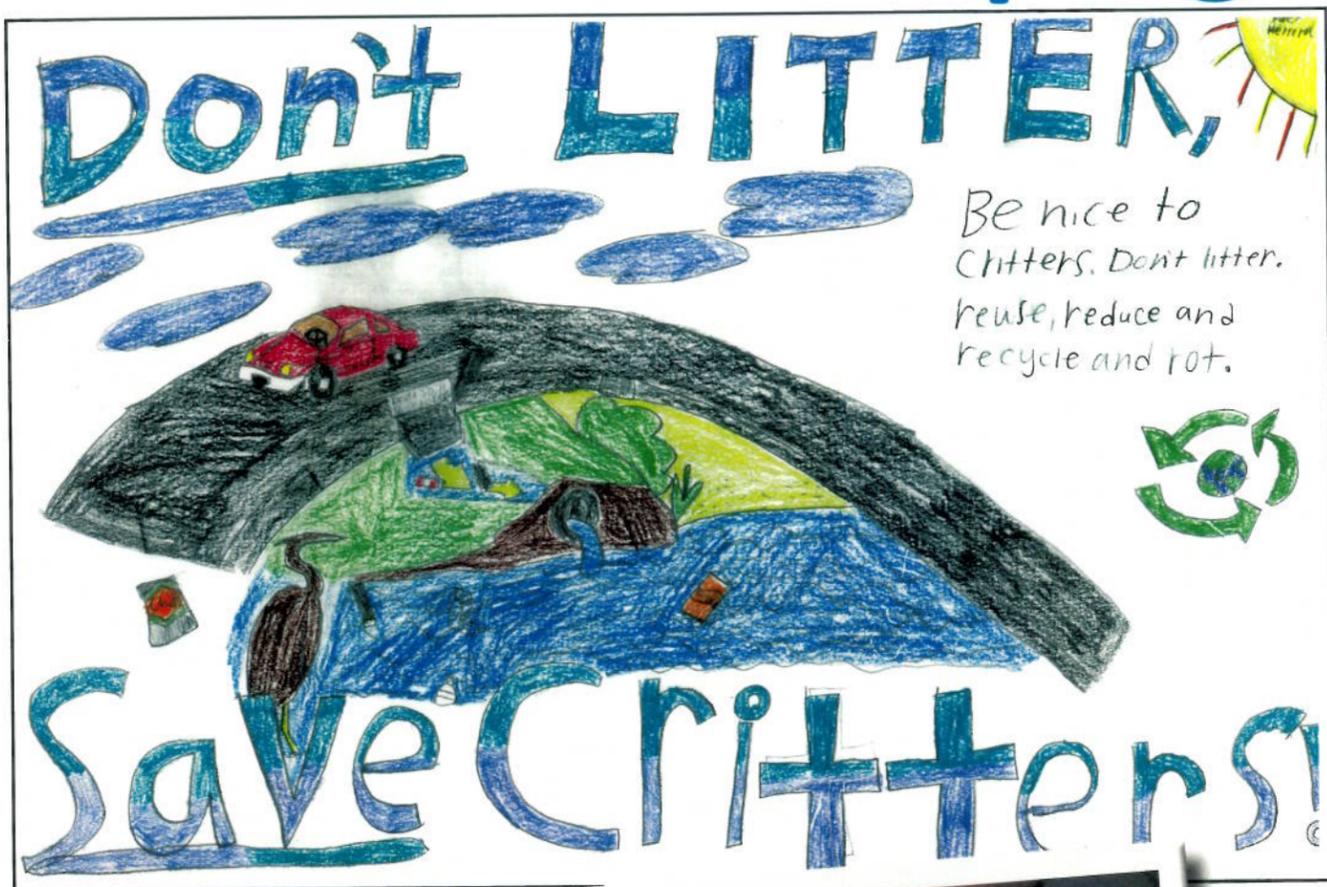


Thank you for teaching us that only rain should go down the storm drain. When we walked around our school we found... 268 pieces of trash. This made me feel... sad because our environment is not clean. I am going to try to protect the environment by leading by example and not littering.

From, Mary



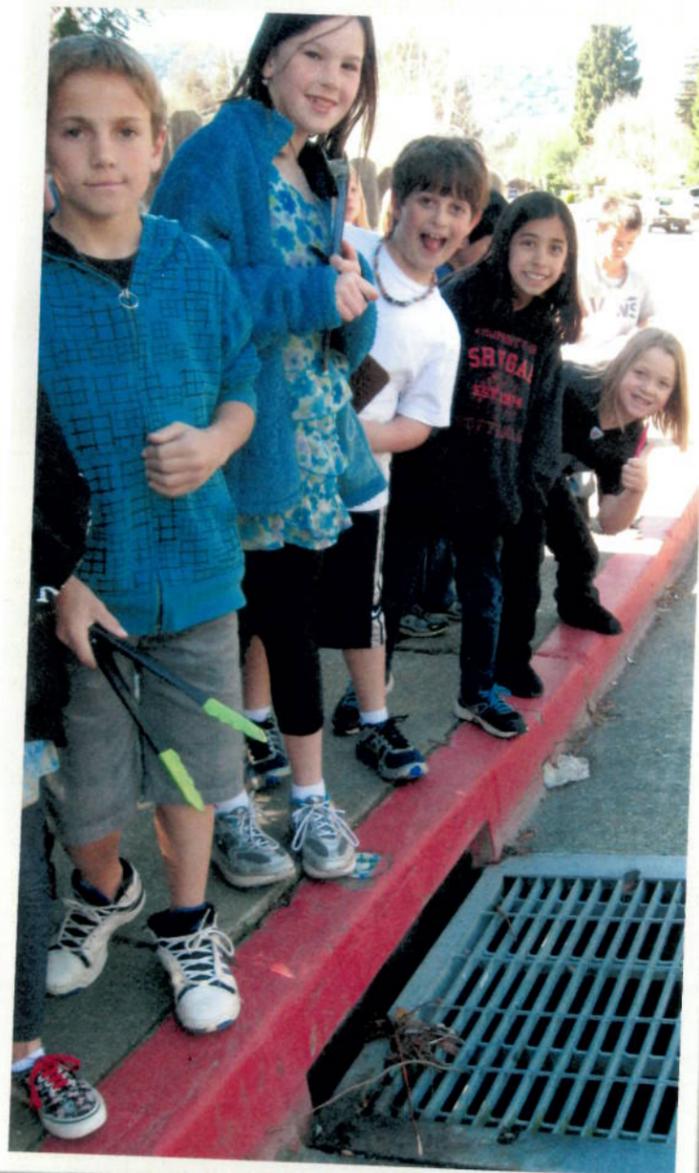
Keeping Pollution...



...Away from the Bay

STORM DRAINS.....

Don't confuse storm drains and sewers. They are very different. Sewers get water from your sinks, showers and toilets. This water is cleaned before it reaches the ocean. Storm drains get water from the rain and the ground; the water in them does NOT get cleaned. Whatever you find on the ground will eventually go into the Sycamore Creek. These ordinary things (like gum wrappers, and/or cleaning supply spills) can hurt organisms. Take time to make sure we don't contaminate our storm drains. You can make a bigger difference than you think!



Stop throwing trash on the ground because it goes down the Storm drain and harms animals Under the water. They will have Pain.



Name of student: Jessica Name of family member: Monica/Mom

KIDS for the BAY Storm Drain Pollution Interview

Introduction: Ask a member of your family to sit down and talk with you about something important you have been learning in school.

Show your family member the picture on the back of this sheet. Explain what the picture shows. Let your family member know that you will be writing down their answers to some questions you are about to ask them.

1. What is a storm drain?

A storm drain is a drain where the water goes when it rains.

2. Where does water from the storm drain go? Does storm drain water get cleaned?

The storm drain water goes to the creeks and rivers.
The storm drain water does not get treated.

3. What is the difference between the storm drain system and the sewer system?

The difference is the sewer system gets treated and the storm drain doesn't.

4. What types of pollution could get into the storm drain? Please list three.

- soda rings
- plastic bags
- chip bags

5. How can you stop these types of pollution getting into the storm drains?

- throw them in the trash.
- take the plastic bags back to the store.
- recycle all recycleables.

6. Why is this important?

It is important because we save the animals and the earth.

7. Make a pledge with your family member to prevent pollution from getting into storm drains. Write your pledge below.

Everytime I see trash I will pick it up.

Parent/Guardian Signature: [Signature]

Thank your family member for talking with you.