



July 10, 2015

Bruce Wolfe, Executive Officer
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street
Oakland, CA 94612
Via email to: mrp.reissuance@waterboards.ca.gov

RE: Comments on the Tentative Order Reissuing the Municipal Regional Stormwater Permit (MRP 2.0)

Dear Mr. Wolfe and Members of the Board:

Thank you for the opportunity to comment on the Tentative Order Reissuing the Municipal Regional Stormwater Permit (MRP 2.0.). The Contra Costa County Flood Control and Water Conservation District (Contra Costa FCD) is very supportive of the San Francisco Bay Regional Water Quality Control Board's (Water Board) efforts to improve water quality in our local creeks, the Delta, and San Francisco Bay. Contra Costa FCD manages over 70 miles of stream channels and 29 detention basins in ten major watersheds in the County. Contra Costa FCD is providing comments regarding Provision C.10 Trash Load Reduction.

Contra Costa FCD greatly appreciates the efforts to remove trash from uplands, riparian areas and streams. Local streams are the last line of defense for trash before it flows into deeper waters where little can be done to address its impacts. Contra Costa FCD has coordinated closely with Contra Costa County and many cities to address potential litter and trash sources. The FCD has taken a leadership role, along with Contra Costa County, in addressing homeless encampments through a multi-disciplinary approach. I gave a presentation earlier this year regarding these efforts.

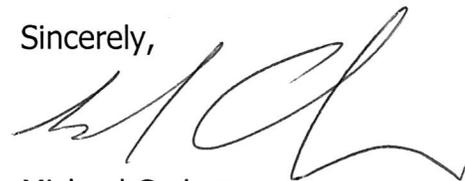
Contra Costa FCD does support the direct discharge program proposed in Provision C.10.e.ii and has concerns the proposed 1:10 credit ratio is so low; many municipalities will choose to not participate due to the costs associated with developing such a robust program.

Contra Costa FCD has similar concerns regarding the credit offset for in-stream clean-ups. The Contra Costa FCD's stream facilities are receiving waters and the trash being discharged from storm drains and blown in from upland areas (such as Caltrans rights of way). In stream clean-ups organized by cities, the County, and local creek groups are the last chance to keep litter from flowing into the Delta, San Francisco Bay, and the Pacific Ocean. We believe these efforts should be strongly encouraged. Not only do they remove litter and illegally dumped items from the streams, they provide opportunities for people to be educated about the value of streams. For many people, especially from economically challenged communities, creek clean-ups may be their only experience of streams and riparian areas. The FCD believes that stream clean-ups should be strongly promoted and encouraged by the Water Board. The 1:10 offset ratio undermines these efforts.

Finally, Contra Costa FCD encourages the Water Board to give some kind of credit for education and outreach efforts regarding the value of watersheds and streams. These basic efforts, often targeted at youth, do have an impact on rates of littering and overall care for our local creeks. It may not be measurable using the techniques outlined in MRP 2.0, but we are looking to change societal practices, and although this could take decades, they do have an impact. Cities and counties who engage in focused and sustained outreach programs should also be give trash reduction credit for these efforts. Remember, trash has not just become an issue since the issuance of the MRP; trash has been an issue for societies since the first villages of our ancestors. We in government have been trying for just as long to control the trash, so we will need to be given adequate time to also control the trash entering into our creek system.

Thank you very much for this opportunity to comment on the draft Municipal Regional Permit.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Carlson', written in a cursive style.

Michael Carlson
Assistant Chief Engineer