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## CITY OF SAN RAMON

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February 1, 2012

Bruce H. Wolfe, Executive Officer  
California Regional Water Quality Control Board  
San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

Ms. Pamela Creedon, Executive Officer  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
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Dear Mr. Wolfe and Ms. Creedon:

Enclosed is the City of San Ramon's Short-Term Trash Reduction Plan submitted in accordance with Provision C.10.a. in NPDES Permit No. CAS612008 issued by the San Francisco Bay Regional Water Quality Control Board, and/or NPDES Permit No. CA0083313 issued by the Central Valley Regional Water Quality Control Board.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluated the information submitted. Based on my inquiry of the person or persons who managed 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."

Sincerely,

Steven Spedowfski  
City of San Ramon

# Baseline Trash Load and Short-Term Trash Load Reduction Plan

## Template & Guidance

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**Submitted by:**

**City of San Ramon**

**2401 Crow Canyon Road**

**San Ramon, CA 94583**



In compliance with Provisions C.10.a(i) and C.10.a(ii) of Order R2-2009-0074

**JANUARY 31, 2012**

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**CITY OF SAN RAMON  
SHORT-TERM TRASH LOAD REDUCTION PLAN**

**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:**



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Steven Spedowski  
Stormwater Program Manager

01/31/12

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## ABBREVIATIONS

BASMAA	Bay Area Stormwater Management Agencies Association
BID	Business Improvement District
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CDS	Continuous Deflection Separator
CEQA	California Environmental Quality Act
CY	Cubic Yards
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
GIS	Geographic Information System
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
Q	Flow
SFRWQCB	San Francisco Regional Water Quality Control Board
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
USEPA	United States Environmental Protection Agency
Water Board	San Francisco Regional Water Quality Control Board
WDR	Waste Discharge Requirements



## **PREFACE**

This Baseline Trash Load and Short-Term Trash Load Reduction Plan (Plan) is submitted in compliance with provision C.10.a(i) and C.10.a(ii) of the Municipal Regional Stormwater NPDES Permit (MRP) for Phase I communities in the San Francisco Bay (Order R2-2009-0074). This Plan was developed using a regionally consistent format developed by the Bay Area Stormwater Management Agencies Association (BASMAA). Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of San Ramon may choose to amend or revise this Plan. If revisions or amendments are necessary, a revised Short-Term Plan will be submitted to the Water Board via the City of San Ramon's annual reporting process.

## 1.0 INTRODUCTION

The Municipal Regional Stormwater NPDES Permit for Phase I communities in the San Francisco Bay (Order R2-2009-0074), also known as the Municipal Regional Permit (MRP), became effective on December 1, 2009. The MRP applies to 76 large, medium and small municipalities (cities, towns and counties) and flood control agencies in the San Francisco Bay Region, collectively referred to as Permittees. Provision C.10 of the MRP (Trash Load Reduction) requires Permittees to reduce trash from their Municipal Separate Storm Sewer Systems (MS4s) by 40 percent before July 1, 2014.

Required submittals to the San Francisco Bay Regional Water Quality Control Board (Water Board) by February 1, 2012 under MRP provision C.10.a (Short-Term Trash Loading Reduction Plan) include:

1. (a) Baseline trash load estimate, and (b) description of the methodology used to determine the load level.
2. A description of the Trash Load Reduction Tracking Method that will be used to account for trash load reduction actions and to demonstrate progress and attainment of trash load reduction levels.
3. A **Short-Term Trash Loading Reduction Plan** that describes control measures and best management practices that will be implemented to attain a 40 percent trash load reduction from its MS4 by July 1, 2014;

This Short-Term Trash Load Reduction Plan (Short-Term Plan) is submitted by the City of San Ramon in compliance with the portions of MRP provision C.10.a.i listed as 1a and 3 above. In compliance with 1b, BASMAA submitted a progress report on behalf of Permittees that briefly describes the methodologies used to develop trash baseline loads (BASMAA 2011a). These methods are more fully described in BASMAA (2011b, 2011c). Lastly, the Trash Load Reduction Tracking Method Technical Report (BASMAA 2011d) was submitted by BASMAA on behalf of Permittees in compliance with submittal 2 described above. The Baseline Loading Rates and Tracking Method projects are briefly described below.

### Baseline Trash Generation Rates Project

Through approval of a BASMAA regional project, Permittees agreed to work collaboratively to develop a regionally consistent method to establish baseline trash loads from their MS4s. The project, also known as the BASMAA Baseline Trash Generation Rates Project assists Permittees in establishing a baseline to demonstrate progress towards MRP trash load reduction goals (i.e., 40 percent). The intent of the project was to provide a scientifically-sound method for developing (default) baseline trash generation rates that can be adjusted, based on Permittee/site specific conditions; and used to develop baseline loading rates and loads. Baseline loads form the reference point for comparing trash load reductions achieved through control measure implementation.

Baseline trash loading rates are quantified on a volume per unit area basis and based on factors that significantly affect trash generation (e.g., land use, population density, and economic profile). The method used to establish baseline trash loads for each Permittee builds off "lessons learned" from previous trash loading studies conducted in urban areas (Allison and Chiew 1995; Allison et al. 1998; Armitage et al. 1998; Armitage and Rooseboom 2000; Lippner et al. 2001; Armitage 2003; Kim et al. 2004; County of Los Angeles 2002, 2004a, 2004b; Armitage 2007). The method is based off a conceptual model developed as an outgrowth of these studies (BASMAA 2011b). Baseline trash loading rates were developed through the quantification and characterization of trash captured in Water Board recognized

full-capture treatment devices installed in the San Francisco Bay area. Methods used to develop trash baseline loading rates are more fully described in BASMAA (2011b, 2011c, and 2012).

## Trash Load Reduction Tracking Method Summary

The trash load reduction tracking method, described in the Trash Load Reduction Tracking Method Technical Report, assists Permittees in demonstrating progress towards reaching trash load reduction goals defined in the MRP (e.g., 40 percent). The tracking method is based on information gained through an extensive literature review and Permittee experiences in implementing stormwater control measures in the San Francisco Bay Area. The literature review was conducted to evaluate quantification methods used by other agencies to assess control measure effectiveness or progress towards quantitative goals. Results are documented in the Trash Load Reduction Tracking Method: Technical Memorandum # 1 – Literature Review (BASMAA 2011d).

Methods attributable to specific trash control measures fall into two categories: 1) trash load reduction quantification formulas; and 2) load reduction credits (BASMAA 2011e). Quantification formulas were developed for those trash control measures that were deemed feasible and practical to quantify load reductions at this time. Load reduction credits were developed for all other control measures included in the methodology development. Both categories of methods assume that as new or enhanced trash control measures are implemented by Permittees, a commensurate trash load reduction will occur. Progress towards load reduction goals will be demonstrated through comparisons to established trash baseline load estimates developed through the BASMAA Baseline Generation Rates Project.

## Short-Term Trash Load Reduction Plan

The purpose of this Short-Term Plan is to describe the current level of implementation of control measures and best management practices, and identify the type and extent to which new or enhanced control measures and best management practices will be implemented to attain a 40 percent trash load reduction from their MS4 by July 1, 2014. The Short-Term Plan was developed using a template created by BASMAA through a regional project. New and enhanced trash control measures (i.e., Best Management Practices) that Permittees may implement to demonstrate trash load reduction goals are included in Table 1.1. This list was developed collaboratively through the BASMAA Trash Committee, which included participation from Permittee, stormwater program, Water Board and non-governmental organization (NGO) staff. The list of control measures is based on: 1) the potential for Permittees to implement; 2) the availability of information required to populate formulas and develop credits; and 3) the expected benefit of implementation. Load reductions associated with each control measure are demonstrated either through a quantification formula (QF) or credits (CR) described in the Trash Load Reduction Tracking Method Technical Report (BASMAA 2011e).

In efforts to reduce trash discharged from MS4s, Permittees may choose to implement control measures that are not included in Table 1.1 or described more fully in BASMAA (2011e). If a Permittee chooses to do so, methods specific to calculating trash load reductions for that control measure would need to be developed. Additionally, at that point, consideration should be given to updating this Short-Term Plan.

Additionally, based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of San Ramon may amend or revise this Plan. If revisions or amendments are

necessary, a revised Short-Term Plan will be submitted to the Water Board via the City of San Ramon’s annual reporting process.

**Table 1.1.** Trash control measures for which load reduction quantification credits or formulas were developed to track progress towards trash load reduction goals.

<b>Load Reduction Credits</b>
Single-use Carryout Plastic Bag Ordinances
Polystyrene Foam Food Service Ware Ordinances
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
Improved Trash Bin/Container Management Activities
Single-Use Food and Beverage Ware Ordinances
<b>Quantification Formulas</b>
On-land Trash Pickup (Volunteer and/or Municipal)
Enhanced Street Sweeping
Partial-Capture Treatment Devices
Enhanced Storm Drain Inlet Maintenance
Full-Capture Treatment Devices
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal)

This Short-Term Plan is organized into the following sections:

- Introduction;
- Trash Baseline Load Estimate;
- Load Reduction Calculation Process
- Planned Implementation of New or Enhanced Control Measures;
- Implementation Schedule; and
- References

## 2.0 BASELINE TRASH LOADING ESTIMATE

*Note: Tables and information presented in this section are subject to change based on the results of a third monitoring event of the BASMAA Baseline Trash Generation Rates Project. Therefore, this section of the Short-Term Plan may be updated with revised trash generation rates, baseline loading rates, and baseline loads.*

This section provides the estimated annual trash baseline load from the City of San Ramon's Municipal Separate Storm Sewer System (MS4). In compliance with Provision C.10.a.ii of the MRP, the City of San Ramon worked collaboratively with other MRP Permittees through BASMAA to develop data and the process necessary to establish baseline trash loading estimate from our MS4. The collaborative project was managed through the BASMAA Trash Committee and included a series of steps described in BASMAA (2012) and listed below. The approach was intended to be cost-effective and consistent, but still provide an adequate level of confidence in trash loads from MS4s, while acknowledging that uncertainty in trash loads still exists. The approach entailed the following steps:

1. Conduct literature review;
2. Develop conceptual model;
3. Develop and implement sampling and analysis plan;
4. Test conceptual model;
5. Develop and apply default trash **generation rates** to Permittee effective loading areas;
6. Adjust default trash generation rates based on baseline levels of control measure implementation by the Permittee to develop trash **baseline loading rates**; and,
7. Calculate Permittee-specific annual trash **baseline load**.

Through the collaborative BASMAA project, default baseline trash generation rates (volume per area) were developed for a finite set of categories, based on factors that significantly affect trash loads (e.g., land use). These trash generation rates were then applied to effective loading areas in applicable jurisdictional areas within the City of San Ramon. Trash generation rates were then adjusted based on baseline street sweeping, storm drain inlet maintenance, and stormwater pump station maintenance conducted in each applicable area. The sum of the trash loads (i.e., rate multiplied by area) from each effective loading area represents the City of San Ramon's baseline trash load from its MS4. A full description of the methods by which trash baseline loads were developed is included in BASMAA (2012a) and is summarized below.

### PERMITTEE CHARACTERISTICS

Incorporated in 1973, the City of San Ramon covers 11,788 acres in Contra Costa County, and has a jurisdictional area of 6,972 acres. According to the 2010 Census, it has a population of 72,148, with a population density of 3,991.1 people per square mile, and average household size of 2.85. Of the 72,148 who call the City of San Ramon home, 29.6% are under the age of 18, 4.9% are between 18 and 24, 31.6% are between 25 and 44, 26.1% are between 45 and 65, and 7.8% are 65 or older.

The City of San Ramon is home to the headquarters for Chevron, 24-Hour Fitness and the West Coast headquarters of AT&T. Other top employers include Robert Half International, San Ramon Regional Medical Center, and Accenture. The median household income was \$95,856 in 2000<sup>1</sup>.

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<sup>1</sup> From the 2000 Census. The median household income for the City of San Ramon from the 2010 Census is not currently available.

## DEFAULT TRASH GENERATION RATES (REGIONAL APPROACH)

A set of default trash generation rates was developed via the BASMAA regional collaborative project (BASMAA 2012a). Default generation rates were developed based on a comparison between trash characterization monitoring results, land uses, economic profiles, and other factors that were believed to possibly affect trash generation. Three trash characterization monitoring events were scheduled via the *Trash Generation Rates Project*. Due to the compliance timeline in the MRP, only two of three trash characterization monitoring events were used to develop trash generation rates described in BASMAA (2012a) and presented in this section. Following the completion of the third characterization event (Winter 2011/12), this section of the Short-Term Plan may be updated to reflect the most up-to-date trash generation and loading rates available. Trash generation rates based on the results of two of the three characterization events are shown in Table 2-1 for each trash loading category.

**Table 2-1: Regional Default Annual Trash Generation Rates by Land Use Category.**

Land Use Category	Generation Rates (Gallons/Acre)
Retail and Wholesale	29.99
High Density Residential	17.04
K-12 Schools	13.14
Commercial and Services/ Heavy, Light and Other Industrial	7.08
Urban Parks	2.14
Low Density Residential	1.25
Rural Residential	0.17

## JURISDICTIONAL AND EFFECTIVE LOADING AREAS

Default trash baseline generation rates presented in Table 2-1 were applied to effective loading areas with **jurisdictional areas** within the City of San Ramon. The City of San Ramon’s jurisdictional areas includes all urban land areas within the City of San Ramon boundaries that are subject to the requirements in the MRP. Land use areas identified by a combination of the ABAG 2005 land use dataset and Permittee knowledge that were not included within the City’s jurisdictional areas include:

- Federal and State of California Facilities and Roads (e.g., Interstates, State Highways, Military Bases, Prisons);
- Roads Owned and Maintained by Contra Costa County;
- Colleges and Universities (Private or Public);
- Non-urban Land Uses (e.g., agriculture, forest, rangeland, open space, wetlands, water);
- Communication or Power Facilities (e.g., PG & E Substations);
- Water and Wastewater Treatment Facilities; and
- Other Transportation Facilities (e.g., airports, railroads, and maritime shipping ports).

Once the City of San Ramon's jurisdictional area was delineated, an effective trash loading area was developed by creating a 200-foot buffer around all streets within the City's jurisdictional area. The purpose of the effective loading area is to eliminate land areas not directly contributing trash to the City's MS4 (e.g., large backyards and rooftops). Both the jurisdictional and the effective loading areas for the City of San Ramon are presented in Table 2-2.

**Table 2-2: Jurisdictional areas and effective loading areas in the City of San Ramon by land use classes identified by ABAG (2005).**

Land Use Category	Jurisdictional Area (Acres)	Effective Loading Area (Acres)	% of Effective Loading Area
High Density Residential	659	530	9
Low Density Residential	4,922	4,335	76
Rural Residential	58	31	1
Commercial and Services/ Heavy, Light and Other Industrial	945	446	8
Retail and Wholesale	222	161	3
K-12 Schools	289	122	2
Urban Parks	247	105	2
<b>TOTAL</b>	<b>7,342</b>	<b>5,730</b>	<b>100%</b>

**PERMITTEE-SPECIFIC BASELINE TRASH LOADING RATES**

Regional default trash generation rates developed through the BASMAA regional collaborative project were applied to effective loading areas within the City of San Ramon based on identified land uses. These generation rates were then adjusted based on the calculated effectiveness of baseline street sweeping, storm drain inlet maintenance and pump station maintenance implemented by the City. These adjustments were conducted in GIS due to the site specificity of baseline generation rates and baseline control measure implementation. The following sections describe the baseline level of implementation for these three control measures. A summary of trash baseline generation and loading rates for the City of San Ramon are provided in Table 2-3 and areas associated with these rates are illustrated in Figure 2-1.

***Baseline Street Sweeping***

A "baseline" street sweeping program is defined as the sweeping frequency and parking enforcement implemented by the City of San Ramon prior to effective date of the MRP. Baseline street sweeping differs from "enhanced" street sweeping, which includes increased parking enforcement and/or sweeping conducted at a frequency greater than baseline ceiling (i.e., once per week for retail land uses and twice per month for all other land uses). The baseline ceiling was created to not penalize implementers of enhanced street sweeping programs prior to the effective date of the MRP. For those Permittees that sweep less frequent than the baseline ceiling, their current sweeping frequency serves as their baseline.

The City of San Ramon's baseline and current street sweeping program includes sweeping most streets in residential areas, retail areas, and arterial roads once per month for most of the year, and twice per month from November to February. Parking enforcement signs for street sweeping are not posted in the City, and parking enforcement equivalent does not exist. The estimated trash load reduced via baseline street sweeping is presented in Table 2-3.

**Baseline Storm Drain Inlet Maintenance**

Within the City, storm drain inlets were cleaned at a baseline level of one time per year prior to the effective date of the MRP. Based on this baseline frequency and the effectiveness rating developed in BASMAA (2012b), the baseline storm drain maintenance program in the City of San Ramon has an annual effectiveness rating of 5%. The estimated trash load reduced via baseline storm drain inlet maintenance is presented in Table 2-3.

**Baseline Stormwater Pump Station Maintenance**

The City of San Ramon does not own stormwater pump stations with trash racks.

**BASELINE TRASH LOADING ESTIMATE**

The estimated baseline trash load from the City of San Ramon was calculated as the sum of the loads from the City’s effective loading area, adjusted for baseline implementation of street sweeping, storm drain inlet maintenance, and pump station maintenance. The preliminary annual trash baseline load for the City of San Ramon is presented in Table 2-3. Preliminary baseline trash loading rates are presented in Figure 2-1 to provide a geographical illustration of areas with estimated low, moderate, and high trash loading rates.

**Table 2-3: Preliminary annual trash baseline load for the City of San Ramon.**

Category	Annual Load (gallons)
Preliminary Generation Trash Load	24,269
Load Removed via Baseline Street Sweeping	5,086
Load Removed via Baseline Storm Drain Inlet Maintenance	959
Load Removed via Baseline Stormwater Pump Station Maintenance	0
<b>Preliminary Trash Baseline Load</b>	<b>18,224</b>

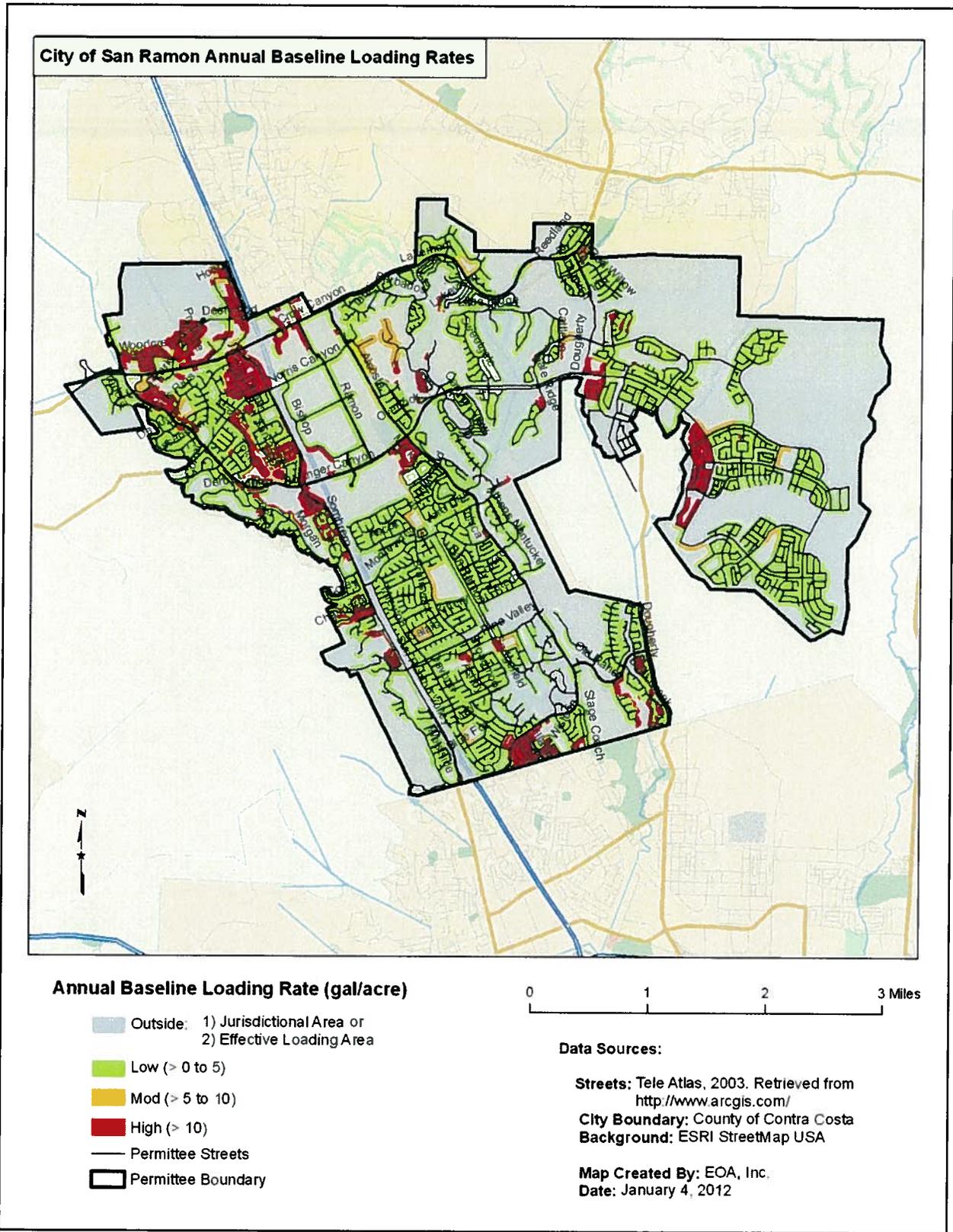


Figure 2-1: Estimated trash baseline loading rates for geographical areas in the City of San Ramon.

### 3.0 LOAD REDUCTION CALCULATION PROCESS

Using the guiding principles and assumptions described BASMAA (2011e), a stepwise process for calculating trash load reductions was developed collaboratively through BASMAA. This process is fully described in Trash Load Reduction Tracking Method Technical Report (BASMAA 2011e) and is briefly summarized in this section. The process takes into account what point in the trash generation and transport process a trash control measure: 1) prevents trash generation, 2) intercepts trash in the environment prior to reaching a water body, or 3) removes trash that has reached a water body. In doing so, it avoids double-counting of trash load reductions associated with specific control measures.

To demonstrate trash load reductions, baseline trash loading rates will be adjusted using the following process:

- Step #1:** Existing Enhanced Street Sweeping
- Step#2:** Trash Generation Reduction
- Step #3:** On-land Interception
- Step #4:** Trash Interception in the Stormwater Conveyance System
- Step #5:** Trash Interception in Waterways
- Step #6:** Comparison to Baseline Trash Load

Reductions calculated in Steps 2 and 5 are assumed to be implemented at a constant rate on an “area-wide” basis. For example, if a new region-wide public education strategy is implemented within the San Francisco Bay area, all Permittees can apply load reduction credits associated with this control measure. In contrast, Steps 1, 3 and 4 are “area-specific” reductions that only apply to specific areas within a Permittee’s jurisdiction. Area-specific control measures include full-capture treatment devices and enhanced street sweeping. Area-specific reductions may require the use of a Geographic Information System (GIS) to calculate.

Reductions are generally applied in the sequence as presented in Figure 2-1 and described below, although some reductions may be applied “in-parallel” and calculated during the same sub-step in the process.

#### **Step #1: Existing Enhanced Street Sweeping**

Trash load reductions due to existing enhanced street sweeping implemented prior to the effective date of the MRP and conducted at levels above baseline levels are not incorporated into each Permittee’s trash baseline load. Therefore, load reductions associated with existing enhanced street sweeping are accounted for first in the trash load reduction calculation process. Existing enhanced street sweeping includes street sweeping conducted at a frequency greater than **1x/week** for streets within retail land use areas or greater than **2x/month** for streets in all other land use areas. The result of adjustments made to trash baseline loads due to the implementation of existing enhanced street sweeping is a set of **current baseline loading rates** and a **current baseline load**.

## Step #2: Trash Generation Reduction Control Measures

Trash generation reduction control measures prevent or greatly reduce the likelihood of trash from being deposited onto the urban landscape. They include the following area-wide control measures:

- CR-1: Single-Use Carryout Plastic Bag Ordinances
- CR-2: Polystyrene Foam Food Service Ware Ordinances
- CR-3: Public Education and Outreach Programs
- CR-4: Reduction of Trash from Uncovered Loads
- CR-5: Anti-Littering and Illegal Dumping Enforcement
- CR-6: Improved Trash Bin/Container Management
- CR-7: Single-Use Food and Beverage Ware Ordinances

Load reductions associated with trash generation reduction control measures are applied on an area-wide basis.<sup>2</sup> Therefore, reductions in current baseline loading rates are adjusted uniformly based on the implementation of the control measure and the associated credit claimed.

Baseline loading rate adjustments for all generation reduction controls measures implemented may be applied in-parallel, but should be applied prior to calculating on-land interception measures discussed in Step #3. The result of adjustments to trash baseline loading rates due to the implementation of these enhanced control measures will be a set of **street loading rates**. The **street load** is the volume of trash estimated to enter the environment and available for transport to the MS4 if not intercepted via on-land control measures described in Step #2.

## Step #3: On-land Interception Control Measures

Once trash enters the environment, it may be intercepted and removed through the following control measures prior to reaching the stormwater conveyance system:

- QF-1: On-land Trash Cleanups (Volunteer and/or Municipal) (Area-wide)
- QF-2: Enhanced Street Sweeping (Area-specific)

Since on-land trash cleanups can affect the amount of trash available to street sweepers, load reductions associated with their implementation will be quantified first, followed by street sweeping enhancements. On-land trash cleanups will be applied as an area-wide reduction and all effective loading rates will be adjusted equally. Enhanced street sweeping, however, is an area-specific control measure and only those effective loading rates associated with areas receiving enhancements will be adjusted. Due to the spatial nature of enhanced street sweeping, GIS may be needed to conduct this step.

The result of adjustments to effective loading rates due to the implementation of these enhanced control measures will be a set of **conveyance system loading rates**. The **conveyance load** is the volume of trash estimated to enter the stormwater conveyance system (e.g., storm drains).

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<sup>2</sup> The only exception to this statement are load reductions associated with the establishment of Business Improvement Districts (BIDs) or equivalent, which are specific to geographic areas and considered "area-specific".

## Step #4: Control Measures that Intercept Trash in the MS4

Control measures that intercept trash in the stormwater conveyance system are area-specific. Therefore, they only apply to land areas and associated trash loads reduced. Conveyance system loading rates developed as a result of Step #3 should be adjusted in-parallel for the following control measures:

- QF-3a: Partial-capture Treatment Device: Curb Inlet Screens (Area-specific)
- QF-3b: Partial-capture Treatment Device: Stormwater Pump Station Trash Racks Enhancements (Area-specific)
- QF-4: Enhanced Storm Drain Inlet Maintenance (Area-specific)
- QF-5: Full-Capture Treatment Devices (Area-specific)

Load reductions for these control measures are calculated in-parallel because they are applied to independent geographical areas. Reductions from all control measures described in this step are area-specific and may require the use of GIS to calculate a set of **waterway loading rates**. Once waterway loading rates have been determined, a **waterway load** will be developed and used as a starting point for calculating load reductions associated with trash interception in waterways discussed in Step #5.

## Step #5: Control Measures that Intercept Trash in Waterways

The load of trash that passes through the stormwater conveyance system without being intercepted may still be removed through interception in waterways. There are two control measures associated with interception in waterways:

- QF-3c: Partial-capture Treatment Device: Litter Booms/Curtains (Area-wide)
- QF-7: Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (Area-wide)

As these control measures are implemented, load reduction estimates can be calculated in-parallel for these two measures.

## Step #6: Comparison to Baseline Trash Load

Applying the four steps described in the processes above will provide an estimated trash load (volume) remaining after trash control measures are implemented. As depicted in the following equation, the relative percent difference between the baseline load and the load remaining after control measures are implemented is the percent reduction that will be used to assess progress towards MRP trash load reduction goals.

$$\frac{\text{Baseline Load} - \text{Remaining Load}}{\text{Baseline Load}} = \% \text{ Reduction}$$

## 4.0 ENHANCED TRASH CONTROL MEASURES

This section describes the new or enhanced trash control measures planned for implementation by the City of San Ramon. The enhanced control measures described are designed to reach a 40% reduction by July 1, 2014. New and enhanced control measures that will be implemented by City of San Ramon include those listed in Table 4.1.

**Table 4.1. Trash control measures that will be implemented by City of San Ramon to reach the 40% trash load reduction.**

Control Measure
Public Education and Outreach Programs
Activities to Reduce Trash from Uncovered Loads
Anti-Littering and Illegal Dumping Enforcement Activities
On-land Trash Pickup (Volunteer and/or Municipal)
Partial-Capture Treatment Devices
Full-Capture Treatment Devices
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal)

### CR-3: Public Education and Outreach Programs

Permittees in the San Francisco Bay Area have implemented public education and outreach programs to inform residents about stormwater issues relating to pollutants of concern, watershed awareness and pollution prevention. Public education and outreach efforts include developing and distributing brochures and other print media; posting messages on websites and social networking media (Facebook, Twitter etc.), attending community outreach events, and conducting media advertising. In recent years, some municipal agencies have implemented anti-litter campaigns to increase public awareness about the impacts of litter on their communities and water quality; and to encourage the public to stop littering.

#### Baseline Level of Implementation

The City of San Ramon plans to continue public education and outreach programs implemented prior to the effective date of the MRP. Prior activities have been modified to include anti-litter or trash information in order to comply with section C.10 of the MRP. New actions or actions started prior to the effective date of the MRP and continued into the future are described under the next section.

#### Enhanced Level of Implementation

The City of San Ramon has implemented the following public education and outreach control measures prior to July 1, 2014.

- A quarterly newsletter is mailed to all businesses and residents. Typically two stormwater related articles are included each year.

- The City conducts two Government 101 classes for residents each year. Part of the program includes a one half hour presentation to residents describing the City's Stormwater Program, Municipal Regional Permit requirements, and State Construction General permit requirements. Approximately 80 residents attend each year.
- All 4,123 stormdrain inlets in the City are inspected each year for the presence of inlet markers. The City's markers consist of a vinyl marker with the direct phone number to the Stormwater Program.
- The City staffs a booth at the annual 4th of July event, Art and Wind Festival, and Farmers Market. Stormwater information is distributed at the City booth.
- San Ramon participates in regional public education activities through the Contra Costa Clean Water Program. Activities include Bringing Back the Natives Garden Tour, Mr. Funnelhead, Newspapers in Education, and Volunteer Creek Monitoring.
- The City contributes to a county-wide advertisement campaign through the Contra Costa Clean Water Program. The litter specific campaign includes t.v. advertisement, bus ads, radio ads, print media, and promotional giveaways.

### **Percent Reduction from Enhancements**

The City of San Ramon will receive an 8% percent reduction credit for implementing specific enhanced control measures described in Enhanced Level of Implementation section above. The 8 percent reduction credit will be applied to the City of San Ramon's baseline trash load. This percent reduction credit is consistent with methods presented in the BASMAA (2011e). A summary of all load reductions anticipated through the implementation of this plan are included in Section 4.0.

## **CR-4: Reduction of Trash from Uncovered Loads**

Although it is currently illegal to operate a vehicle that is improperly covered and which its' contents escapes<sup>3</sup>, vehicles remain an important trash source to MS4s and local waterways. Specifically, vehicles that do not secure or cover their loads when transporting trash and debris have a high risk of contributing trash to MS4s. Land areas that generate trash from vehicles include roads, highways (on/off ramps, shoulders or median strips) and parking lots. To help address the dispersion of trash from unsecured or uncovered vehicles destined for landfills and transfer stations, Permittees may require municipally-contracted trash haulers to cover or secure loads or work with municipal or private landfill and transfer station operators to educate waste haulers on securing loads and/or to enhance enforcement of existing regulations.

### **Baseline Level of Implementation**

The baseline trash load described in Section 2.0, assumes that prior to adoption of the MRP the City of San Ramon has not adopted control measures to reduce trash from vehicles with uncovered loads. Therefore, implementation of any of the control measures described in this section is considered to be enhanced implementation.

### **Enhanced Level of Implementation**

The City of San Ramon has implemented and the following enhanced control measures to reduce trash from vehicles with uncovered loads prior to July 1, 2014:

- The City's standard conditions of approval for construction sites require all loads to be covered to and from the construction site.
- The City's Waste Management contract requires trash haulers to cover loads when transporting trash to landfills and transfer stations.
- The City of San Ramon Police Department actively enforces California Vehicle Code Sections 23114 and 23115 prohibiting transportation of materials in an uncovered vehicle.

### **Percent Reduction from Enhancements**

The City of San Ramon will receive a 5 percent reduction credit for implementing specific enhanced control measures described in Description of Enhanced Level of Implementation section above. The 5% percent reduction credit will be applied to the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of San Ramon. This percent reduction credit was obtained from the Trash Load Reduction Tracking Method Report (BASMAA 2011e) and is presented in the Trash Load Reduction Summary Table included in Section 4.

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<sup>3</sup> In accordance with the California Vehicle Code Sections 23114 and 23115, it is against the law to operate a vehicle on the highway which is improperly covered, constructed, or loaded so that any part of its contents or loads spills, drops, leaks, blows, or otherwise escapes from the vehicle. Exempted materials include hay and straw, clear water and feathers from live birds. Additionally, any vehicle transporting garbage, trash, or rubbish, used cans or bottles, waste papers, waste cardboard, etc. must have the load covered to prevent any part of the load from spilling on the highway (CVC 2011). Significant fines are possible for non-compliance.

## **QF-1: Enhanced On-Land Trash Cleanups (Volunteers and/or Municipal)**

On-land cleanups conducted by Permittees and volunteers have been successful in removing trash from identified trash hot spots and engaging local citizenry in improving their communities. Permittees have several programs in place to address on-land trash. Municipal efforts relate to ongoing beautification of impacted areas and coordination of cleanup events. Volunteer on-land cleanups involve the meeting of individuals, creek and watershed groups, civic organizations, businesses and others at designated or adopted on-land sites to remove trash. On-land trash cleanups are conducted as single-day or throughout the year.

### **Baseline Level of Implementation**

The City of San Ramon implemented enhanced on-land cleanup activities prior to the effective date of the MRP. Activities include litter pickup by City employees in all outdoor park and recreation areas, along streets including major arterial and collector streets, and through the city wide landscaping and lighting district during landscape maintenance activities.

### **Enhanced Level of Implementation**

City of San Ramon will continue to conduct or coordinate the enhanced on-land cleanup activities listed above. These on-land cleanups are conducted as frequently on a weekly basis and the volume of trash removed will be tracked prior to July 1, 2014 to demonstrate trash loads reduced.

Please note that **only trash that has the potential of entering the MS4 will be tracked**. As a result, large items (e.g., appliances, shopping carts, furniture, mattresses, televisions, tires, lumber, etc.) that will be removed during on-land trash cleanups are not part of the volume determination since they do not have the potential of entering the MS4.

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that is reduced as a result of implementing on-land trash cleanups is 279.4 cubic feet. This volume is equal to approximately a 11.5 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of San Ramon. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

## **QF-3: Partial-Capture Treatment Devices**

Partial-capture devices are treatment devices that have not been approved as full-capture by the San Francisco Bay Regional Water Quality Control Board, but capture trash at a known effectiveness value. Partial-capture devices may be similar to full-capture devices, but do not meet the full capture definition due to engineering challenges; or they may be completely different types of devices. Partial-capture devices include curb inlet screens (e.g., automated retractable screens), litter booms/curtains and stormwater pump station track racks. Trash loads reduced via partial-capture devices within a Permittee's jurisdictional boundaries may be used to demonstrate attainment of trash load reduction goals.

### **Baseline Level of Implementation**

#### **Curb Inlet Screens and Litter Booms/Curtains**

Prior to effective date of the MRP, some Permittees within the Bay area have installed and maintained curb inlet screens and litter booms/curtains. To avoid penalizing these early implementers, the applicable control measure implemented by a Permittee prior to the effective date of the MRP will be credited equally to a control measure implemented after the effective date. Furthermore, the trash load removed via these devices installed prior to the MRP is not accounted for in baseline trash loads. Therefore, the baseline level of implementation is not applicable for this control measure, as devices installed prior to the effective date of the MRP and associated loads reduced will be grandfathered in as enhanced measures.

### **Enhanced Level of Implementation**

A total of 62 partial-capture treatment devices have been or will be installed in the City of San Ramon prior to July 1, 2014. A list of these partial-capture devices is included in Table QF-4-1. All devices listed within the table are enhanced trash control measures. Calculation of loads reduced from partial-capture devices will be consistent with the approach described in the Trash Load Reduction Tracking Method Report (BASMAA 2011e).

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing partial-capture treatment devices listed in Table QF-4-1 is 31.82 cubic feet. This volume is equal to approximately a 1.3 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of San Ramon. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

**Table QF-4-1. Partial capture treatment devices installed or planned to be installed within the City of San Ramon prior to July 1, 2014.**

Table QF-4-1. Partial capture treatment devices installed or planned to be installed within the City of San Ramon prior to July 1, 2014.

Device ID	Public or Private	Device Name	Location (Cross Streets)	Installation Date/Anticipated Installation Date	Total Area Treated (acres)	Trash Load Reduced
WCS-2-1	Public	ARS- Auto Retractable Screen	520 Iris Ln, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-2	Public	ARS	525 Iris Ln, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-3	Public	ARS	609 Sunflower Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-4	Public	ARS	508 Winding Brook Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-5	Public	ARS	713 Ashton Oaks Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-6	Public	ARS	1130 Vista Monte Dr, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-7	Public	ARS	804 Amberwood Way, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-8	Public	ARS	201 Elder Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-9	Public	ARS	301 Ginger Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-10	Public	ARS	Red Willow Rd & Morning Glory Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-11	Public	ARS	501 Morning Glory Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2-12	Public	ARS	500 Morning Glory Ct, San Ramon, CA 94582	10/11	1.39 acres est. via data calc	.41 gallons est. per data calc
WCS-2	Public	ARS	50 locations TBD	08/12	69.5 acres est. per data calc	288 gallons est. per data calc

## **QF-5: Full-Capture Treatment Devices**

As defined by the Municipal Regional Stormwater Permit (MRP), a full-capture system or device is any single device or series of devices that traps all particles retained by a 5 mm mesh screen and has a design treatment capacity of not less than the peak flow rate (Q) resulting from a one-year, one-hour, storm in the sub-drainage area. A list of the full-capture systems and devices recognized by the San Francisco Bay Regional Water Quality Control Board (Water Board) is included in Trash Load Reduction Tracking Method Report (BASMAA 2011e). Trash loads reduced via publically or privately owned and operated devices within a Permittee's jurisdictional area that have been recognized by the Water Board as full-capture may be used to demonstrate attainment of trash load reduction goals.

### **Baseline Level of Implementation**

Prior to adoption of the MRP, some Permittees installed and maintained full capture devices. To avoid penalizing these early implementers, an applicable control measure implemented within a Permittee's jurisdictional area prior to the effective date of the MRP will be credited equally to a control measure implemented after the effective date. Therefore, the baseline level of implementation is no trash full-capture devices have been installed.

### **Enhanced Level of Implementation**

A total of 97 trash full-capture treatment devices have been or will be installed in the City of San Ramon prior to July 1, 2014. 23 of the devices were installed prior to the implementation of the MRP. The City is currently mapping the treatment area and devices for submittal in future reports. A list of these full-capture devices is included in Table QF-6-1. All devices listed within this table are enhanced trash control measures. Table QF-6-1 also includes the area treated and the calculated trash load reduced from each full-capture treatment device. These calculations are consistent with the approach described in the Trash Load Reduction Tracking Method Report (BASMAA 2011e).

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing full capture devices is 292.35 cubic feet. This volume is equal to approximately a 12 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of San Ramon. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

**Table QF-6-1. Trash full-capture treatment devices within the jurisdictional boundaries of the City of San Ramon that are planned for installation by July 1, 2014.**

Device ID	Public or Private	Device Name	Location (Cross Streets)	Installation Date/Anticipated Installation Date	Total Area Treated (acres)	Trash Load Reduced
WCS-1-1	Public	CPS- Connector Pipe Screen	541 Iris Ln, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-2	Public	CPS	609 Sunflower Ct, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-3	Public	CPS	644 Rock Rose Ln, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-4	Public	CPS	100 Park Pl, San Ramon, CA 94583	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-5	Public	CPS	San Ramon, CA	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-6	Public	CPS	Park Pl & Boardwalk Pl, San Ramon, CA 94583	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-7	Public	CPS	Park Pl & Boardwalk Pl, San Ramon, CA 94583	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-8	Public	CPS	Old Ranch Rd & Vista Monte Dr, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-9	Public	CPS	1030 Vista Monte Dr, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-10	Public	CPS	Vista Monte Dr & Winding Brook Ct, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-11	Public	CPS	600 Fawn Ridge Ct, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-12	Public	CPS	1100 Vista Monte Dr, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-13	Public	CPS	2270 San Ramon Valley Blvd, San Ramon, CA 94583	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-14	Public	CPS	1130 Vista Monte Dr, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-15	Public	CPS	809 Amberwood Way, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc
WCS-1-16	Public	CPS	998 Bentley Oak Ct, San Ramon, CA 94582	10/11	2.8 acres est. via data calc	.71 gallons est. per data calc

City of San Ramon

					Ramon, CA 94582								
WCS-1-17	Public	CPS			121 Barberry Ln, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-18	Public	CPS			220 Dandelion Ln, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-19	Public	CPS			201 Elder Ct, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-20	Public	CPS			200 Elder Ct, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-21	Public	CPS			300 Ginger Ct, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-22	Public	CPS			301 Ginger Ct, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-23	Public	CPS			321 Flax Ln, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-24	Public	CPS			425 Honeysuckle Ln, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1-25	Public	CPS			541 Iris Ln, San Ramon, CA 94582	10/11			2.8 acres est. via data calc			.71 gallons est. per data calc	
WCS-1	Public	CPS			Locations TBD	08/12			139.7 acres est. via data calc			134 gallons est. per data calc	
	Public	Various Designs			23 Locations				1894 est. acres			924 gallons est. per data calc	

## **QF-6: Creek/Channel/Shoreline Cleanups**

Creek/channel/shoreline cleanups have been successful in removing large amounts of trash from San Francisco Bay area creeks and waterways; and increasing citizen's awareness of trash issues within their communities. Creek/channel/shoreline cleanups are conducted as single-day events or throughout the year by volunteers and municipal agencies. Since volunteers and municipal agencies have the common goal of clean creeks and waterways, their efforts sometimes overlap. This is apparent with some municipal agencies using volunteers to help assess and clean designated trash hot spots during single-day volunteer events.

### **Baseline Level of Implementation**

Trash reduced via creek/channel/shoreline cleanups was not accounted for in the City of San Ramon's baseline trash load described in Section 2.0. Therefore, implementation of any of the control measures described in this section is considered to be an enhancement and can be used to demonstrate progress towards load reduction goals.

### **Enhanced Level of Implementation**

Prior to July 1, 2014, the City of San Ramon will conduct MRP-required<sup>4</sup> and the following non MRP-required creek/channel/shoreline cleanups<sup>5</sup> listed below. The City of San Ramon's creek maintenance program inspects problem areas up to a weekly frequency. During the inspections, City staff removes trash on an as needed basis. The volume of trash removed will be tracked to demonstrate trash loads reduced.

### **Percent Reduction from Enhancements**

The total estimated annual volume of trash that will be reduced by July 1, 2014 as a result of implementing creek/channel/shoreline cleanups is 606 cubic feet. This volume is equal to approximately a 6.3 percent reduction in the baseline trash load to urban creeks from the municipal separate storm sewer system (MS4) owned and operated by the City of San Ramon. Both values provided within this section are included in Trash Load Reduction Summary Table included in Section 4.

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<sup>4</sup> Creek/channel/shoreline cleanups conducted in accordance with Permit Provision C.10.b.

<sup>5</sup> All "other" creek/channel/shoreline cleanups conducted by a municipality that are not required by Provision C.10.b.

**Table 5-1. Planned enhanced trash control measure implementation within the jurisdictional boundaries of the City of San Ramon and associated trash loads reduced.**

Trash Control Measure	Summary Description of Control Measure	% Reduction (Credits)	Trash Load Reduced	Cumulative % Reduction (Compared to Baseline)
Public Education and Outreach Programs (CR-3)	Enhance advertising campaign, outreach to school-age children, media relations and community outreach events	8	1458	8
Activities to Reduce Trash from Uncovered Loads (CR-4)	Require contracted trash and construction debris haulers to cover loads when transporting trash to public or privately-owned landfills	5	911	13
Enhanced On-land Trash Cleanups (Volunteer and/or Municipal) (QF-1)	Parks and Street litter removal programs	NA	2090	24.5
Curb Inlet Screens (Partial-capture Treatment Device) (QF-3a)	Install and maintain 62 devices	NA	238	25.8
Full-capture Treatment Devices (QF-5)	Install and maintain 92 devices	NA	2187	37.38
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (QF-6)	Creek litter removal program	NA	1134	44.0

## **5.1 Annual Reporting and Progress Towards Trash Load Reduction Goal(s)**

Consistent with MRP Provision C.10.d (i), the City of San Ramon intends to report on progress towards MRP trash load reduction goals on an annual basis beginning with the Fiscal Year 2011-2012 Annual Report. Annual reports will include:

1. A brief summary of all enhanced trash load reduction control measures implemented to-date;
2. The dominant types of trash likely removed via these control measures;
3. Total trash loads removed (credits and quantifications) via each control measure implementation; and
4. A summary and quantification of progress towards trash load reduction goals.

Similar to other MRP provision, annual reporting formats will be consistent region-wide. Annual reports are intended to provide a summary of control measure implementation and demonstrate progress toward MRP trash reduction goals. For more detailed information on specific control measures, the City of San Ramon will retain supporting documentation on trash load reduction control measure implementation. These records should have a level of specificity consistent with the trash load reduction tracking methods described in the BASMAA Trash Load Reduction Tracking Method Technical Report (BASMAA 2011e).

## **5.2 Considerations of Uncertainties**

Baseline trash loading and load reduction estimates are based on the best available information at the time this Short-Term Plan was developed. As with any stormwater loading and reduction estimate, a number of assumptions were used during calculations and therefore uncertainty is inherent in the baseline trash load estimate presented in Section 2.0 and the load reduction estimate presented in this section. For these reasons, the baseline loading estimates presented in this plan should be considered first-order estimates. During the implementation of this Short-Term Plan and subsequent plans, additional information may become available to allow the calculation of a more robust baseline load.

## **6.0 IMPLEMENTATION SCHEDULE**

Implementation of enhanced trash control measures by the City of San Ramon is currently planned to occur in a timeframe consistent with MRP requirements. A preliminary implementation schedule for all planned enhancements is described in Table 5-1. This schedule provides a timeframe for reducing trash discharged from the City of San Ramon's MS4 by 40%.

Based on new information that becomes available during the implementation of this Short-Term Plan (e.g., revisions to baseline loading estimates or load reduction credits of quantification formulas), the City of San Ramon may chose to amend or revise this Plan and/or the associated implementation schedule. If revisions or amendments occur, a revised Short-Term Plan and implementation schedule will be submitted to the Water Board via the City of San Ramon's annual reporting process.

Table 5-1. Preliminary implementation schedule for enhanced trash control measures in the City of San Ramon.

Trash Control Measure	Beginning Date of Implementation
Public Education and Outreach Programs (CR-3)	Prior to July 1, 2014
Activities to Reduce Trash from Uncovered Loads (CR-4)	Prior to July 1, 2014
Anti-Littering and Illegal Dumping Enforcement Activities (CR-5)	Prior to July 1, 2014
On-land Trash Cleanups (Volunteer and/or Municipal) (QF-1)	Prior to July 1, 2014
Curb Inlet Screens (Partial-capture Treatment Device) (QF-3a)	Prior to July 1, 2014
Full-capture Treatment Devices (QF-5)	Prior to July 1, 2014
Creek/Channel/Shoreline Cleanups (Volunteer and/or Municipal) (QF-6)	Prior to July 1, 2014

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