



February 3, 2013

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

Pamela Creedon, Executive Officer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RE: Long-Term Trash Load Reduction Plans Submittal Pursuant to Municipal Regional Permit and East Contra Costa County Municipal NPDES Permit Provision C.10.c. for Contra Costa Clean Water Program Permittees

Dear Mr. Wolfe and Ms. Creedon:

This letter accompanies transmittal of Long-Term Trash Load Reduction Plans (Plans) for Contra Costa Clean Water Program (CCCWP) Permittees. Each Permittee has signed and certified their individual Plan on behalf of their agency. The individual Plans describe control measures and best management practices that are being implemented and the level of implementation, and additional control measures and best management practices that will be implemented and/or an increased level of implementation designed to attain a 70% trash load reduction from their Municipal Separate Storm Sewer Systems (MS4s) by July 1, 2017, and 100% by July 1, 2022 for Permittees subject to the Municipal Regional Permit. For Permittees subject to the East Contra Costa County Municipal NPDES Permit, the Plans are designed to attain a 70% trash load reduction by July 1, 2018, and 100% by July 1, 2023.

The Plans follow a common template, which CCCWP Permittees developed collectively with support from CCCWP staff. The template facilitates consistent organization of the Plans and reflects the CCCWP Permittees' common approach to trash load reduction.

This approach was developed in two stages. In the first stage, CCCWP staff and staff from some CCCWP municipalities participated with Tom Mumley, Dale Bowyer, and

other members of San Francisco Bay Regional Water Quality Control Board (SFB Water Board) staff in a regional process, coordinated through the Bay Area Stormwater Management Agencies Association (BASMAA). The process extended from late 2012 through mid-2013 and produced consensus on an 8-step framework to guide the long-term plans:

1. Identify high, medium, and low trash generation areas, based on land use and other geographic data, local knowledge, and field verification.
2. Attempt to identify sources in high and medium trash generation areas to assist in focusing control measures.
3. Prioritize areas and problems/types.
4. Identify options (tools) for dealing with prioritized areas/problems.
5. Define success/goals and measurement type.
6. Select and implement tools.
7. Evaluate success.
8. Modify as needed.

With this framework in place on a regional basis, CCCWP Permittees proceeded with the second stage, which was to develop practical and workable methods to implement each step. In particular, the CCCWP Permittees sought to implement guidance from the SFB Water Board members—expressed publicly at the November 13, 2013 and December 11, 2013 Board workshops and also communicated through SFB Water Board staff—that trash load reduction efforts include methods to assess effectiveness and to adjust and redirect efforts according to local outcomes.

The results of this second stage are reflected in the template and in the individual Permittee Plans. In particular, the template and plans show the following:

- **Local Staff Engagement:** The CCCWP Permittees' Plans emphasize the use of local knowledge—drawn from long-term experience and supplemented by recent surveys of local streets and water bodies—to identify areas of trash accumulation and likely sources. The Plans also tap local staff knowledge of their community's resources and social dynamics and incorporate creative and innovative methods of addressing trash problems.
- **A Holistic Approach to Trash Sources and Load Reductions:** While recognizing the limits of current permit requirements, the CCCWP Permittees' Plans aim to protect and enhance beneficial uses of local water bodies by reducing trash from all sources. Trash conveyed by the MS4 is not separable, in practical terms, from trash that is windblown or that is generated by illegal dumping or homeless encampments. This holistic view facilitates the organization and direction of community resources to address trash problems, unencumbered by distinctions between trash that is subject to load reduction requirements and trash that is not.
- **Organization of Trash Reduction Efforts by Trash Management Area:** Each Permittee's Plan breaks down the jurisdiction-wide effort into individual

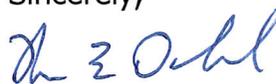
plans for each Trash Management Area (TMA). This carries through the consensus to focus local efforts on specific areas and problems where trash loading is most severe and where reduction efforts can have the most effect. Each Permittee's Plan explains how TMAs were delineated, and why. Individual trash reduction plans for each TMA include methods to evaluate the effectiveness of measures implemented within that TMA. The individual plans for each TMA are compiled in Section 4 of each Permittees' Plan.

- **Emphasis on Low Impact Development.** For the past decade, Contra Costa Permittees have led the region in implementation of Low Impact Development (LID), in both private developments and in retrofitting public infrastructure. Contra Costa Permittees envision that some years from now, through implementation of LID requirements for new developments and redevelopments and through incorporation of bioretention in the reconfiguration of public streets and right-of-way, a substantial portion of the urban landscape will include LID. LID is very effective at preventing transmission of trash to and through MS4s, while also greatly reducing stormwater loads of mercury, PCBs, and other pollutants of concern. LID facilities are more sustainable and more likely to be maintained than underground full-trash-capture devices, and have ancillary benefits as well. Accordingly, Contra Costa Permittees have included existing LID facilities in their trash reduction Plans.
- **Emphasis on Continuous Improvement.** The Contra Costa Permittees' Plans demonstrate that each Permittee has used local resources to identify the location and nature of trash problems within their jurisdiction, has identified ways to apply current local resources to reducing and eliminating the problems, has identified means to evaluate progress toward that goal, and has mechanisms in place to adjust the Plan in response to changing sources and locations of trash, changing local resources, and the effectiveness of management measures.

We take this opportunity to thank your staff for working with our agencies to develop what we believe will be an effective approach to reducing trash in our municipalities, as well as protecting San Francisco Bay and its tributaries.

If you have any questions about this transmittal, please contact me at tdalz@pw.cccounty.us or (925) 313-2392.

Sincerely,



Thomas E. Dalziel
Program Manager
Contra Costa Clean Water Program