From:	David Lewis
To:	Bowyer, Dale@Waterboards
Subject:	Letter to the Regional Water Quality Control Board
Date:	Thursday, January 10, 2019 8:18:33 AM

Dear Chair Young and Members of the Board:

California's state agencies should be leaders in complying with federal and state pollution laws that protect San Francisco Bay and other waterways. But the California Department of Transportation (Caltrans) has failed for years to comply with the Clean Water Act and its stormwater permit requirements to control trash.

More than two years after a formal Notice of Violation, Caltrans still has not produced an acceptable plan to halt its illegal pollution. We appreciate the Board finally proposing a Draft Order requiring Caltrans to take specific trash control measures, but that order must be significantly strengthened to reduce damage to the Bay. We urge you to revise the draft order to require:

- *Accelerated installation of full trash capture actions that intercept trash from an additional 1,000 acres each year to achieve 6,000 acres of treatment by 2024, and treatment of all significant trash generating areas – no less than 8,820 acres – by 2028,*
- *Submission by Caltrans of a detailed trash generation map and explicit work plan within 3 months of permit adoption, and commitment of budgeted funds to implement the order,*
- *Cooperative agreements with municipalities to fund operation and maintenance of trash capture devices in addition to installation.*

These changes are essential to protect the Bay's ecology and recreational value, achieve timely compliance with pollution laws, and hold Caltrans accountable for the same trash control requirements you impose on cities and counties. The Board should vote to approve the Order with these changes.

Thank you for taking these crucial actions to stop pollution of the Bay from Caltrans roads.

Sincerely,

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ZIP Code
94704
Petition Signed
Petition to the Water Board, January 2019
Comments
Garbage and debris sourced from CalTrans roadways has a major negative impact on flood risk and erosion in our local waterways, in additional to the harmful impacts on the Bay ecosystem. As a Geologist and Civil Engineer, I have direct experience with the difficulty of predicting and managing the trash load when designing and maintaining channel restoration and flood control structures. CalTrans must do a better job in reducing the amount of trash entering our creeks; they can do it, but it will take stronger regulatory action from the Water Board than we've seen to date.