From:	David Lewis
To:	Bowyer, Dale@Waterboards
Subject:	Letter to the Regional Water Quality Control Board
Date:	Sunday, January 06, 2019 4:15:53 PM

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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Petition Signed

Petition to the Water Board, January 2019

Comments

I urge the members of the Regional Water Quality Control Board to revise the draft Enforcement Order and strengthen it by requiring the following:
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.

We must reduce the trash pollution from entering the San Francisco Bay by holding Caltrans accountable. Caltrans must stop violating the Clean Water Act and the Water Board must protect the Bay.