



B A S M A A

Alameda Countywide
Clean Water Program

Contra Costa
Clean Water Program

Fairfield-Suisun
Urban Runoff
Management Program

Marin County
Stormwater Pollution
Prevention Program

Napa County
Stormwater Pollution
Prevention Program

San Mateo Countywide
Water Pollution
Prevention Program

Santa Clara Valley
Urban Runoff Pollution
Prevention Program

Sonoma County
Water Agency

Vallejo Sanitation
and Flood
Control District

Bay Area

Stormwater Management

Agencies Association

P.O. Box 2385

Menlo Park, CA 94026

510.622.2326

info@basmaa.org

July 6, 2012

Bruce Wolfe, Executive Officer
San Francisco Bay Regional Water Board

**Subject: Response to June 7, 2012 Regional Water Board letter regarding
Trash Reports and Plans**

Dear Mr. Wolfe:

This letter is submitted by the Bay Area Stormwater Management Agencies Association (BASMAA) on behalf of all Municipal Stormwater NPDES Permit (Order R2-2009-0074) permittees in response to Water Board staff comments on Trash Plans and Reports, dated June 7, 2012. This response includes a time schedule (Attachment A) for actions that will be taken by permittees to respond to issues presented in the June 7th letter.

At the outset, however, BASMAA member agencies and the permittees must take issue with the comments provided by the Water Board staff pertaining to their compliance with Provision C.10 of the Municipal Regional Stormwater Permit (MRP). While further dialogue and additional effort may be warranted to improve the Short-Term Trash Loading Reduction Plans and related regional documents, these submissions were timely, designed to attain a 40% trash load reduction by July 1, 2014, and addressed the parameters set forth in the MRP such that there has been no failure to comply with the MRP.

In addition, it is important to recognize that the permittees expended (individually and through BASMAA) considerable resources to-date to address C.10 requirements in order to answer the Water Board's direction that trash reduction from municipal stormwater systems is a Bay Area priority. BASMAA and the permittees made considerable progress in the development of baseline trash loads and control measure tracking methods and implementation of enhanced control measures to reduce trash in local water bodies. Specifically, in the two years since MRP adoption, permittees have:

- Created the BASMAA Trash Committee to coordinate trash requirements at the regional level and engage Water Board staff and other stakeholders in how to best achieve significant trash load reductions.
- Identified hundreds of trash hot spots and conducted annual cleanups at these sites in water bodies to reduce existing trash impacts.
- Installed hundreds of full capture trash control devices resulting in the treatment of thousands of acres of urban land area.
- Conducted reviews of the worldwide literature to guide development of science-based baseline trash loads and load reduction tracking methods.
- Conducted over 20 meetings during which preliminary concepts and methods for developing trash baseline loads and tracking methods were openly discussed with Water Board staff and stakeholders and constructive feedback was solicited.

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- Developed and provided draft versions of sampling and analysis plans and tracking methods to Water Board staff and stakeholders for review and comment.
- Implemented a baseline trash generation rate study where thousands of gallons of material collected via full capture devices were characterized.
- Developed preliminary baseline trash generation rates and trash load reduction tracking methods that incorporated feedback provided by active stakeholders.
- Created a template and guidance for permittees to use when developing short-term trash load reduction plans, which was provided to Water Board staff and other stakeholders for review and comment, and was intended to standardize plans and ease review by Water Board staff.
- Planned, created, and submitted individual short-term plans for review by Water Board staff.
- Applied for grants to assist permittees in implementing enhanced trash controls and developing methods to verify trash load reduction and control measure effectiveness.

Throughout the past two years, BASMAA has facilitated a collaborative and open process to provide for Water Board staff and stakeholder involvement. This process was specifically developed to foster collaboration among agencies, organizations, and individuals that have interest in reducing trash in cost-effective ways, under what is arguably a very aggressive compliance timeframe mandated in the MRP.

BASMAA and the permittees remain committed to reducing impacts from trash discharged from municipal stormwater systems and complying with MRP requirements. To this end, BASMAA requests, on behalf of all permittees, a meeting between program and permittee representatives and the Water Board Executive Officer to discuss policy-related issues identified in Water Board staff's comments and to chart a course for a more collaborative and constructive process for continuous improvement and implementation of the MRP's trash-related requirements. A time schedule for responding to issues presented by Water Board staff in its June 7, 2012 comment letter is attached. We will contact you to set up a meeting.

Please let us know if you have questions.

Sincerely,

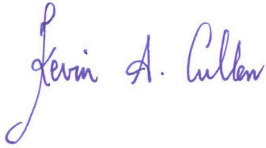


James Scanlin, Alameda Countywide Clean Water Program



Tom Dalziel, Contra Costa Clean Water Program

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Kevin Cullen, Fairfield-Suisun Urban Runoff Management Program



Matt Fabry, San Mateo Countywide Water Pollution Prevention Program



Adam Olivieri, Santa Clara Valley Urban Runoff Pollution Prevention Program



Lance Barnett, Vallejo Sanitation and Flood Control District

Attachment A: Approach and time schedule for responding to Water Board staff's June 7, 2012 comments on trash-related submittals

cc: Tom Mumley, Regional Water Board
Dale Bowyer, Regional Water Board
BASMAA Board of Directors
Chris Sommers, BASMAA Trash Committee

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Attachment A – Approach and time schedule for responding to Water Board staff comments on trash-related submittals dated June 7, 2012.

Plan/Report	Action	Time Schedule
All Plans/Reports	Program and Permittee representatives meet with Water Board Executive Officer to discuss Water Board staff comments.	July/August 2012
Baseline Trash Generation Rates	Permittees (via BASMAA) refine preliminary Trash Generation Rates based on additional data collection and analyses, and in consideration of June 7, 2012 Water Board staff comments.	May – September 2012
	Permittees (via BASMAA) submit Final Trash Generation Rates report to Water Board.	September 15, 2012 (Annual Report)
	Permittees (via BASMAA) present Final Trash Generation Rates to stakeholders (including Water Board staff).	September 2012
Baseline Trash Loads	Permittees submit final baseline trash loads based on final trash generations rates, and in consideration of June 7, 2012 Water Board staff comments.	September 15, 2013
Trash Load Reduction Tracking Method	Permittees (via BASMAA) refine Trash Tracking Method in consideration of June 7, 2012 Water Board staff comments and outcomes of the meeting with Water Board EO.	August 2012 – February 2013
	Permittees (via BASMAA) submit refined Trash Tracking Method technical report to Water Board ¹	February 1, 2013
	Permittees (via BASMAA) present the refined Trash tracking Method to stakeholders (including Water Board staff).	February 2013
Trash Load Reduction Plan	Permittees (via BASMAA) meet with Water Board staff to review Long-Term Trash Load Reduction Plan Templates and Guidance, including the planned level of detailed descriptions of actions.	February – March 2013
	Permittees (via BASMAA) revise template/guidance (as necessary) in consideration of comments received and submits to permittees for use when developing Long-Term Load Reduction Plans.	March – April 2013
	Based on revisions to Tracking Method and template/guidance, each permittee develops and gains internal approval for their Long-Term Trash Load Reduction Plan to address the 70% and 100% trash load reduction goals.	February 2013 – February 2014

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	Permittees submit Long-Term Trash Load Reduction Plan to Water Board based on version 2.0 of Trash Load Reduction Tracking Method.	February 1, 2014
Annual Reporting	FY 2011-12: <ul style="list-style-type: none"> Permittees provide detailed descriptions of actions taken to-date to reduce trash by 40%. Descriptions will include preliminary estimated load reductions achieved to-date based on information currently available and version 1.0 of tracking method. On behalf of permittees, BASMAA submits Final Trash Generation Rate report. 	September 15, 2012
	FY 2012-13: <ul style="list-style-type: none"> Permittees submit final trash baseline load. Permittees provide detailed descriptions of actions taken to-date to reduce trash by 40%, including load reductions achieved to-date based on version 1.0 of the Trash Tracking Method submitted to the Water Board on February 1, 2012 and their final baseline load. 	September 15, 2013
	FY 2013-14: <ul style="list-style-type: none"> Permittees demonstrate 40% reduction in trash from their MS4 consistent with the version 1.0 of the Trash Tracking Method submitted to the Water Board on February 1, 2012. 	September 15, 2014