



Friends of the San Pablo Bay National Wildlife Refuge

7715 Lakeville Hwy
Petaluma, CA 94954

FSPBNWR@gmail.com
sanpablobayrefugefriends.org

January 14, 2019

San Francisco Bay Regional Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, Ca 94612
Attn: Dale Bowyer

Subject: Comments on the Tentative Order for the California Department of Transportation (CalTrans)

Dear Mr. Bowyer,

The Board of the Friends of the San Pablo Bay National Wildlife Refuge support the San Francisco Bay Water Board's adoption of a Cease and Desist Order against CalTrans and respectfully request that the time schedule for compliance be accelerated. San Francisco Bay's wildlife refuges, by virtue of their location along the Bay's shoreline, are impacted by trash generated off-site from highways and roads, that is then transported via wind and stormwater to the refuges' sensitive wildlife habitat. While we support the planning activities required by the Tentative Order, the Order as written allows seven years to evaluate the feasibility of addressing the identified significant trash generating right-of-way areas (ROW), which is only a portion of the potential trash generating areas along the State's highways in the Region, and 12 years to come into compliance with the State's trash regulations. We understand the challenges posed by implementing structural solutions and the need for feasibility studies, but the schedule for evaluating feasibility should be accelerated and creative non-structural solutions should be instituted sooner than the overall 12-year compliance period provided for in the Tentative Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin Bodell". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Justin Bodell

Board President