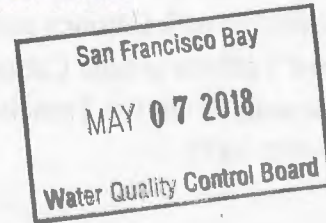




MAY 02 2018

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX – PACIFIC SOUTHWEST REGION
75 Hawthorne Street
San Francisco, CA 94105-3901

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



Dear Mr. Wolfe:

I am writing to provide EPA's support to the San Francisco Bay Regional Water Quality Control Board (Board) in its effort to reduce the prevalence of trash in Bay Area waterways.

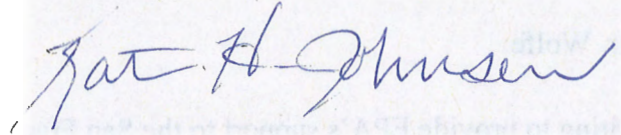
Unfortunately, EPA was unable to attend the March 14, 2018 Board meeting during which this topic was discussed. We understand, based on information provided in the Board's staff report, the Board is comfortable with the progress most municipalities are making in this effort as required by the 2015 Municipal Regional Stormwater Permit (MRP). However, the Staff Report expresses concern that California Department of Transportation (Caltrans) has not made the expected progress to reduce trash reaching the San Francisco Bay from its facilities as required by its permit.

The Staff Report cites that between May 2014 and the present, while Bay Area cities and counties have been devoting significant resources to install trash capture devices and implement control programs, Caltrans submitted several inadequate trash control workplans to the San Francisco Water Board. EPA appreciates that the Board provided feedback during numerous meetings and in written correspondence to Caltrans on their workplans and ultimately, issued a notice of violation to Caltrans in December 2016 highlighting its failure to implement adequate trash control measures.

Through your on-going work with Caltrans, we want to ensure two key elements of trash reduction are implemented for Caltrans. First, all trash reduction measures must include clear timeframes for Caltrans to implement specific, quantifiable, trash reduction projects. Second, we understand that through your work overseeing trash reductions for the municipalities subject to the MRP, some important methodologies have been developed that are transferrable to Caltrans, and are likely a better tool for identifying where trash reduction projects are best implemented. EPA has not independently reviewed these methodologies, but encourages transfer of methods where appropriate. We believe Caltrans should reassess its facilities consistent with assessment methods and results used by Bay Area municipalities, and determine trash control priorities in accordance with that revised assessment, with particular attention to facilities adjacent to high trash generation areas already identified by Bay Area municipalities.

We value our partnership with the Board in implementing the Clean Water Act and continue to offer our services and technical expertise to improve San Francisco Bay. We also value our partnership with Caltrans and expect them to be an active partner in the region. We support the Board's efforts to hold Caltrans accountable and to achieve necessary, measurable trash reductions in the San Francisco Bay Area. Should you have any questions, please call me at 415-972-3873.

Sincerely,

A handwritten signature in blue ink that reads "Kathleen Johnson". The signature is written in a cursive style and is positioned over a light blue rectangular background.

Kathleen Johnson
Director
Enforcement Division

cc: Thomas Mumley, AEO
San Francisco Bay RWQCB