



# CITY OF SAN PABLO

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## DIRECT DISCHARGE TRASH CONTROL PLAN

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FEBRUARY 1, 2020



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## Section 1: Purpose, Scope and Regulatory Drivers

The purpose of this *Direct Discharge Trash Control Plan (Direct Discharge Plan)* is to document the City of San Pablo's comprehensive plan to control, to the extent practicable, the discharge of trash to receiving waters from non-storm drain system sources. This plan was developed in accordance with San Francisco Bay Regional Water Quality Control Board (RWQCB) Provision C.10.e.ii of the Municipal Regional Permit (MRP) under the National Pollutant Discharge Elimination System (NPDES)<sup>1</sup>.

The MRP allows Permittees to offset part of Provision C.10.a trash load percent reduction requirements by implementing a comprehensive plan, approved by the Executive Officer, to control direct discharges of trash to receiving waters from non-storm drain system sources. The Provision sets a maximum of 15% offset credit and requires the plan to be submitted by February 1 of the first year in which offsets are to be reported in the Annual Report (i.e., fiscal year (FY) 2019/20 Annual Report). This *Direct Discharge Plan* includes the following required elements:

- Description of sources of the directly discharged trash;
- Description of control actions that will be implemented to prevent or reduce direct discharge trash loads in a systematic and comprehensive manner;
- Map of the affected receiving water area and associated watershed; and
- Description of how the effectiveness of controls will be assessed, including documentation of controls, quantification of trash volume controlled and assessment of resulting improvements to receiving water conditions.

## Section 2: Background

### 2.1 City of San Pablo

Incorporated in 1948, the City of San Pablo ("the City") spans an area of 2.6 square miles in Contra Costa County ("the County") in the San Francisco Bay Area (Bay Area) of California. As a State identified disadvantaged community, the population is predominantly low and moderate income, with 20% of the population identified as living at or below the poverty rate<sup>2</sup>. Of the City's 31,000 residents, 61% identify as Hispanic or Latino, 15% Asian and 12% Black or African American. The predominate language spoken in the City is Spanish (55%), though languages from Asia and/or Pacific Islands are also common (11%).

### 2.2 San Pablo's Long-Term Trash Reduction Plan

On January 31, 2014, the City submitted the *Long-Term Trash Management Plan (Long-Term Plan)* to the RWQCB in compliance with Provision C.10.c of the MRP for Phase I communities in the Bay Area<sup>3</sup>. The *Long-Term Plan* acknowledged the City's understanding that the achievement of clean waterways leads to a healthy city. The goal of the *Long-Term Plan* was to effectively manage and minimize the potential

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<sup>1</sup> Permit No. CAS612008, Order No. R2-2015-0049

<sup>2</sup> <https://datausa.io/profile/geo/san-pablo-ca>

<sup>3</sup> Order R2-2009-0074



impacts of trash on receiving waters associated with discharges from the City's Municipal Separate Storm Sewer System (MS4), which are regulated by NPDES Permit requirements.

The *Long-Term Plan* established a framework of short- and long-term actions needed to reduce San Pablo's trash load and continues to guide the City's efforts today. Per the *Long-Term Plan*, the City is pursuing further methods to meet the mandatory trash reduction targets associated with the City's MS4.

### 2.3 Direct Discharge Trash Sources

San Pablo has approximately five (5) miles of creeks flowing through the City within three (3) watersheds (San Pablo, Wildcat and Rheem). Trash is transported to the creeks through multiple pathways other than the City's MS4. This *Direct Discharge Plan* focuses on three (3) main sources of trash to receiving waters including: on-street and park litter blown by wind directly into waterways; trash dumped illegally into or near creeks; and trash and debris left behind or dumped by homeless residents who camp in/near waterways.

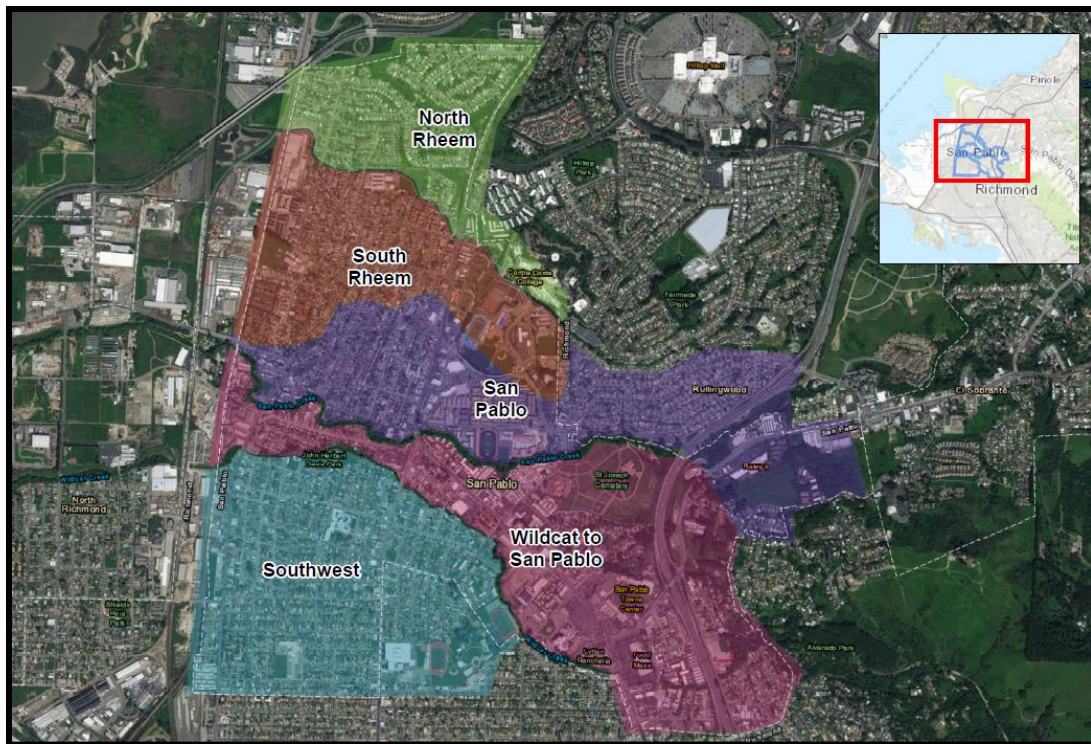


Figure 1: City of San Pablo Creeks and Hydrologic Zones according to the Storm Drain Master Plan

#### 2.3.1 Wind Blown Litter

Many areas in San Pablo that are adjacent to transit stops, commercial centers and parks have high rates of litter. The source of this litter is a combination of overflowing trash bins, pedestrians and vehicles with improperly secured loads. To address this on-street litter, the City has been working with a local non-profit organization, EarthTeam, to document and remove litter from specific areas in the City. Since 2015 when this partnership began, EarthTeam has documented, geo-tagged and removed over 34,000 pieces of litter.



Image 1: EarthTeam students removing litter in San Pablo in 2018

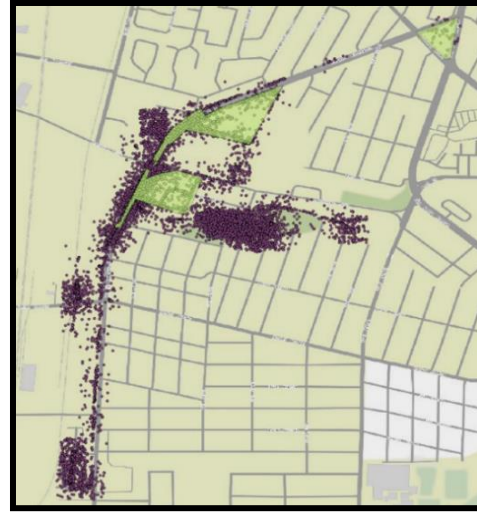


Figure 2: EarthTeam Litter Map, 2019

### 2.3.2 Illegal Dumping

San Pablo has a severe, well-documented problem with illegal dumping throughout the City. The San Pablo Public Works Department spends over \$68,000 per year on removal of illegal dumping. In FY 2018/19 the City addressed over 527 illegal dumping work orders and removed more than 460 tons of illegally dumped debris and litter from City streets, parks and rights-of-way. City staff have identified two (2) factors that contribute to a large portion of the illegal dumping in the City:

- **High resident turnover due to low homeownership rate** – San Pablo is a renter community, with a homeownership rate of about 38%. High renter turnover, as well as a lack of education and communication between landlords, tenants and the City, has led to major illegal dumping issues, particularly adjacent to multi-unit dwellings (MUDs).
- **The City's proximity to the local landfill** – The City of San Pablo is located 1.3 miles from the West Contra Costa Landfill/Golden Bear Transfer Station (Landfill). When residents or businesses are unable or unwilling to pay the disposal rates at the Landfill, San Pablo is the adjacent community where some decide to dump their waste as an alternative.



Image 2: Illegally dumped items adjacent to MUDs

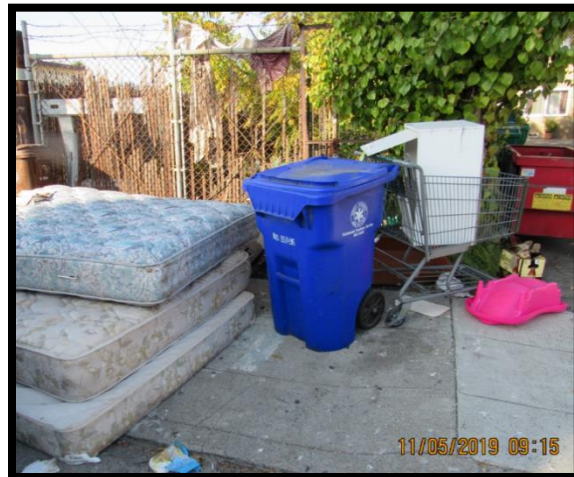


Image 3: Illegally dumped items adjacent to MUDs



### 2.3.3 Homeless Encampments

Homelessness in and around the Bay Area is a growing and substantial regional issue. The Bay Area has the third-largest population of unhoused people in the United States, behind New York City and Los Angeles. The commonality between these regions is high housing costs. A 2018 study by University of California, Los Angeles<sup>4</sup> found a direct correlation between the cost of housing and the rate of homelessness. In 2019, Contra Costa County's homeless population rose 43% from 2017<sup>5</sup>, a trend echoed across the entire Bay Area. Homeless populations contribute trash to waterways as a result of a lack of adequate sanitation and solid waste services at encampments, which pose a threat to water quality and public health. Homelessness is a complex and challenging societal issue that lacks a simple solution, at both regional and jurisdictional levels.



Image 4: Large homeless encampment in Oakland, CA

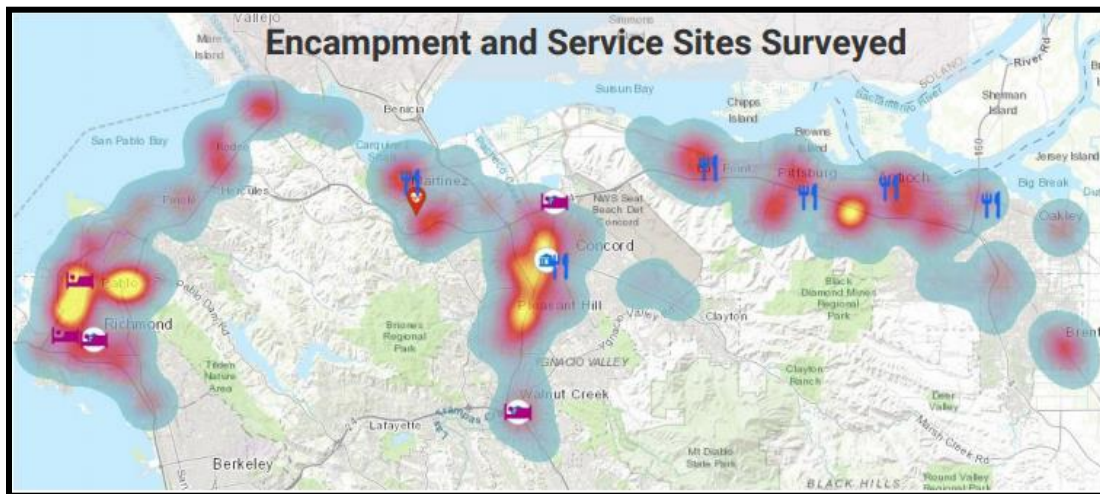


Figure 3: Homeless encampment heat map of Contra Costa County. The City of San Pablo is located in the western region of the County.

<sup>4</sup> [http://www.uclaforecast.com/uploads/forecasts/2018/June/uclaforecast\\_June2018\\_embargoed.pdf](http://www.uclaforecast.com/uploads/forecasts/2018/June/uclaforecast_June2018_embargoed.pdf)

<sup>5</sup> <https://cchealth.org/h3/coc/pdf/PIT-report-2019.pdf>

## Section 3: Direct Discharge Trash Control Plan

### 3.1 Litter and Illegal Dumping

#### 3.1.1 Current Condition and Prevention

Litter and illegal dumping are two (2) pervasive sources of trash that enter the creeks in San Pablo. In FY 2018/19, the Public Works Maintenance Division responded to over 527 instances of illegal dumping. The cost of cleaning illegal dumping in San Pablo is, on average, over \$68,000 per year.

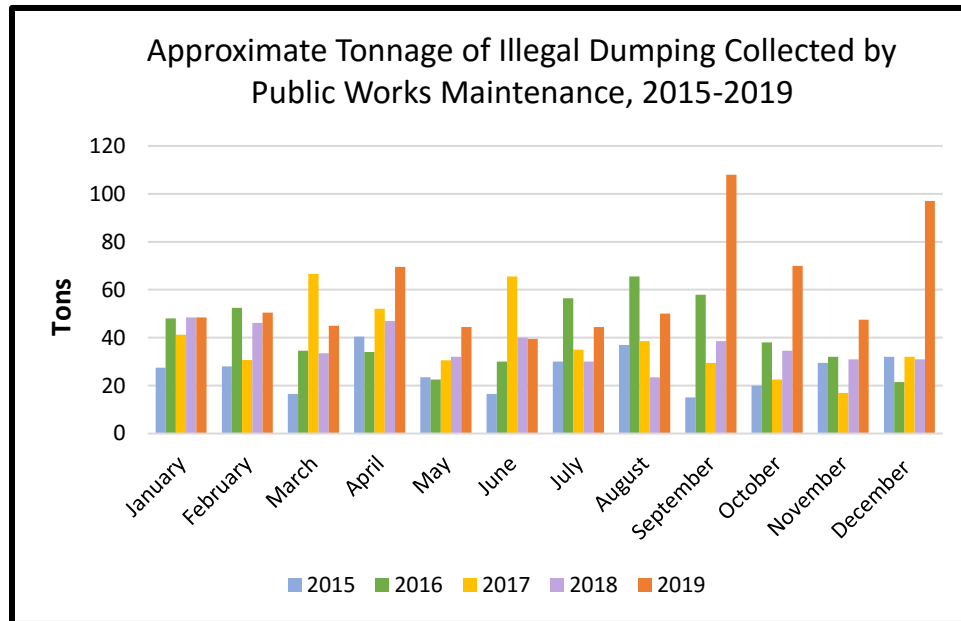


Figure 4: Approximate tonnage of illegal dumping collected by PW Maintenance, 2015-2019

To address illegal dumping, San Pablo residents are eligible for the following free waste disposal services, provided in coordination with Republic Services:

- \$60 of dump vouchers per fiscal year,
- waste drop off events (“Dumpster Days”),
- two (2) yearly curbside collections of up to 15 bags per collection,
- one (1) yearly bulky item curbside collection,
- household hazardous waste disposal, and
- mattress recycling.

It should be noted that the curbside collections of bags and one (1) bulky item are services only available to single-family and duplex households, not MUDs.

There are 37 cameras in San Pablo capable of monitoring for illegal dumping, as well as additional cameras in the Del Camino government housing area and Giant Trade Center that are privately owned but provide full access to the San Pablo Police Department (PD). Currently, this footage is only being monitored retroactively in response to reported illegal dumping.



To help address litter, residential streets are swept two (2) times per month and commercial streets four (4) times per month. Despite these efforts, litter often builds up as some residents do not adhere to the “no parking on street sweeping days” signs and PD currently lacks the capacity for consistent parking enforcement.

To address litter at the source, the City approved a single-use plastic bag ordinance, which became effective on January 1, 2014. The ordinance prohibits the distribution of single-use plastic bags in retail stores (e.g. supermarkets and clothing stores) and requires retailers to charge customers a minimum of 10 cents for other, reusable plastic bags. Restaurants and take-out food establishments are exempt from the ordinance. Additionally, the City approved a plastic foam (polystyrene) ordinance, which became effective on April 1, 2015. The ordinance prohibits restaurants and City facilities/events from providing plastic foam foodware. Furthermore, the ordinance prohibits the sale of plastic foam products in retail stores (e.g. plastic foam plates, coolers). Meat and seafood, as well as pre-packaged foods, are exempt from the plastic foam ban.

San Pablo works with EarthTeam to provide paid student internships to Richmond High students for environmental stewardship education, work-based learning opportunities, litter removal and leadership training. Through this program, students perform 30 litter removal events on Rumrill Boulevard, San Pablo Ave, 23<sup>rd</sup> Street and Brookside Drive per year. The City also works with Kids for the Bay to provide watershed and trash education to Dover, Downer and St. Paul Elementary school students. In addition, every October, the City partners with Kids for the Bay to host a Wildcat Creek Cleanup Event where volunteers from these schools remove trash and debris from the Creek and Davis Park.



*Image 5: Kids for the Bay Wildcat Creek Cleanup, 2019*



*Image 6: San Pablo Dumpster Day*

### 3.1.2 Litter and Illegal Dumping Task Force Pilot Program

In July 2019, the City Manager hosted a Strengths, Weaknesses, Opportunities and Threats (S.W.O.T.) staff workshop to gain insight and recommendations on the issue of litter and illegal dumping in San Pablo. From this workshop, the City Manager formed the Litter and Illegal Dumping Task Force (Task Force) with staff from the Public Works, Police and Community Services Departments. The Task Force met bi-monthly to discuss and develop a holistic approach to reducing litter and illegal dumping including: 1) programs and infrastructure, 2) an education and outreach campaign, and 3) maintenance and enforcement around litter and illegal dumping. This program approach aims to teach residents about proper disposal methods,

as well as encourage them to take ownership and have pride in their community. The Task Force developed the following recommendations for implementation through a multi-year strategic approach.

**Outreach Campaign**

Develop an outreach and education campaign with the goals of educating residents and businesses about the programs offered in San Pablo and inspiring community pride. The educational component aims to reset social norms on personal responsibility for proper waste disposal, reemphasize the laws and consequences for litter and illegal dumping, and remind residents and businesses of proper disposal options available to them. This program would use bilingual print and social media, as well as community events, to engage the community.

**Infrastructure**

Install additional infrastructure, such as trash bins and fencing, to improve proper disposal in the public rights-of-way. The Public Works Department will install additional trash bins, where needed, to reduce littering. In addition, fencing could be installed in areas adjacent to creeks, to reduce illegal dumping and littering.

**Enforcement and Maintenance**

In order to continue encouraging citizens to properly dispose of their waste, the Code Enforcement Division will identify opportunities to improve enforcement on parking violations, to make street sweeping more effective, and enforce on littering and illegal dumping violations. Additionally, the Task Force recommends that the Maintenance Division identify strategies to service the additional trash bins and maintain the fencing.

**New Ordinances**

New ordinances that will require non-franchised haulers to obtain a permit from the County's Environmental Health Department in order to operate in the City. This permit would require haulers to be inspected and follow County rules about collecting and transporting solid waste. Permitted haulers would be issued decals for their vehicles and would then be permitted to drive on San Pablo roads and offer their services within the City.

City staff will also explore a potential excess litter fee on the types of facilities that are determined to excessively contribute to the City's litter and illegal dumping issue. The City will review studies that investigate the correlation between certain business types and amounts of disposable materials that end up as litter or illegal dumping on the street and in the creeks. Initial review of studies demonstrates that the types of businesses likely to be covered include MUDs, fast food restaurants, convenience markets, gasoline station markets and liquor stores. The City would complete a fee study to determine the fee amount and types of businesses that will be subject to the fee. The purpose of this fee would be to help maintain clean streets and sidewalks, as well as provide resources to support outreach, programs, infrastructure improvements and enforcement on litter and illegal dumping.

### 3.1.3 Reporting and Evaluation

In order to evaluate the effectiveness of litter and illegal dumping reduction efforts, the City will collect and compare multiple qualitative and quantitative parameters, including:

- a pre-/post-survey of business, schools and residents on available programs;
- data on tonnage of illegal dumping collected (specifically in or adjacent to creeks);
- number, types and location of litter collected (Earth Team);

- on-land visual trash assessments (OVTAs);
- litter hot-spot assessments; and
- the number of parking citations issued.

In addition, the City will continue to monitor and document illegal dumping and encampment abatement using the City's asset management system, Cartegraph.

### 3.2 Illegal Encampments

#### 3.2.1 Overview of Homelessness in San Pablo

Like much of the Bay Area, Contra Costa County and the City of San Pablo are experiencing rising housing costs and an increase in homeless encampments. The County median household income is \$95,339, whereas the City has a median household income of \$47,495. There are a number of low-income housing options in San Pablo; however, the 2019 Contra Costa County Point-in-Time (PIT) Homeless Count estimated the San Pablo homeless population at 58<sup>6</sup>. For context, this equates to 23.2 homeless persons per square mile in the City, compared to neighboring Richmond's 6.3 homeless persons per square mile<sup>7</sup>. In 2019, the total number of homeless individuals in the County was estimated at 2,295, a 3% increase from 2018. Approximately 71% of these persons were unsheltered, including 974 living in encampment areas.

In 2018, the City piloted a new program called the Partnership to Assist the Transition from Homelessness (PATH) Program. As a part of this program, the City dedicated one (1) full-time Police Officer to identify encampment locations, determine the number of encampment residents and help the residents connect to services. In addition, the City piloted work with the County's Coordinated Outreach, Referral, Engagement (C.O.R.E.) Team for rapid response for any individual accepting services. The PATH program identified 88 encampments and 165 people experiencing homelessness. This count is greater than the PIT count and likely more accurate. This is because the PATH Program outreach was conducted over a longer period of time and was able to include people who are transient and may not have been in San Pablo on the day of the PIT count.

Despite the high number of persons experiencing homelessness within San Pablo's small boundaries, the City does not receive any funding from the State or the County to tackle this issue. There are no homeless shelters located within the City and the City has declared a shelter crisis. The City's unhoused residents, as well as those at risk of homelessness, must rely almost entirely on County aid and services.

#### 3.2.2 Support Programs and Shelters

##### **Ujima Family Recovery Services**

Ujima Family Recovery Services (UFRS) is a non-profit organization dedicated to helping families recover from alcoholism, drug addiction and behavioral health problems. UFRS has been serving the Richmond area since 1986. UFRS aims toward stopping substance abuse and empowering mothers and fathers to develop life skills to lead healthy, productive lives. Programs include alcohol and drug education, parent education, peer mentoring, clinical and psychiatric support services and therapeutic child care. UFRS collaborates with the County and other agencies for the provision of case

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<sup>6</sup> <https://cchealth.org/h3/coc/pdf/Annual-Report-2018.pdf>

<sup>7</sup> The 2019 Contra Costa County PIT count estimated Richmond's homeless population at 333. The City of Richmond encompasses 52.5 square miles.



management, foster care and family support services. UFRS is located at 12960 San Pablo Avenue, Richmond.

**Women, Infants and Children (WIC) San Pablo, via Contra Costa County**

WIC is a federally-funded supplemental nutrition program that helps pregnant women, postpartum mothers, infants and children (up to age 5) create a healthier lifestyle. WIC provides nutrition education, breastfeeding support, financial assistance for purchasing nutritious foods and referrals to other resources throughout the County. WIC serves an average of 5,900 participants per month in West Contra Costa County. San Pablo WIC is located at 501 Gateway Avenue, San Pablo.

***San Pablo Senior Center***

The San Pablo Senior Center is a multi-service center that offers multiple social services, such as nutritional programs and transportation, for San Pablo's senior population. The Senior Center also offers weekly recreational and exercise activities, including bingo, dances, social trips, movie screenings, karaoke and yoga classes. Other services include blood pressure checks, Medicare/medical information sessions, Samuel Merritt University nursing student presentations, insurance information sessions, earthquake preparedness and a scholarship program. There is a yearly membership fee of \$10, although membership is not required to attend Senior Center programs. The Senior Center is located at 1943 Church Lane, San Pablo.

***San Pablo Economic Development Corporation (EDC)***

San Pablo EDC aims to develop, diversify and stabilize the local economy. This multi-service program offers workshops, trainings, business/entrepreneurship classes and other professional development services. Their programs include subsidized childcare; resume, cover letter and interview workshops; free professional clothing and subsidized tattoo removal. EDC is located at 13830 San Pablo Ave Suite D, San Pablo.

***Shelters***

There are no homeless shelters located in San Pablo, but there are four (4) shelters within 2.5 miles of the City, all located in Richmond or Unincorporated Contra Costa County.

1. West County Interim Housing Program - Brookside Shelter
  - Open 24 hours/day, individuals may stay up to 120 days
  - Services: meals, laundry, mail, phones, case management, referrals
2. GRIP Family Housing Program - West County Resource Center
  - Emergency shelter and transitional housing
  - Services: case management, lunch 365 days/year
3. Bay Area Rescue Mission - Women and Family Shelter
  - Shelter and transitional housing
  - Services: private rooms, meals, showers, job skills training, legal and financial advising
4. Bay Area Rescue Mission - Men's Shelter
  - Shelter and transitional housing
  - Services: meals, showers, legal and financial advising, GED prep, budgeting, anger management, individual and group counseling

5. Greater Richmond Interfaith Program (GRIP) - West County Warming Center
  - Warming Center open six (6) days a week (8:00PM to 7:00AM)
  - Services: warmth, food, mailing services, laundry, case management, family shelter, veteran housing, alcohol and drug services

### 3.2.3 Homeless Encampment Management

Despite these efforts, homelessness is still a prolific issue in San Pablo, and litter and illegal dumping associated with homeless encampments is responsible for a large percentage of direct discharges of trash into creeks. Managing and redirecting the homeless population from waterway areas is critical to mitigating the water quality impacts from homeless encampments. The following describes how the City has responded to this challenge.

#### ***San Pablo Coordinated Outreach, Referral, Engagement (C.O.R.E.) Team***

Since early 2019, the City has contracted with Contra Costa Health, Housing and Homeless Services to provide C.O.R.E. Team services to individuals experiencing homelessness within the boundaries of San Pablo. The C.O.R.E. Team consists of two (2) people who aim to engage and stabilize unhoused individuals via consistent outreach. The C.O.R.E. Team provides services in San Pablo between 12:00PM and 8:00PM on Tuesdays and Thursdays. The City has allocated \$60,570 per year (\$4,943.33 per month, plus a Housing Assistance Fee of \$1,250) to funding this program. In order to receive payment, the C.O.R.E. Team is required to deliver a monthly invoice to the City documenting the dates that services were provided and the time spent rendering these services.

Through consistent outreach, the C.O.R.E. team facilitates and delivers health and basic needs services and aids homeless individuals in finding permanent housing. The C.O.R.E. Team initiates contact with homeless individuals, assesses their housing and service needs (standardized intake), then facilitates connections to shelter, benefits, behavioral health and primary healthcare services. The C.O.R.E. Team is required to connect homeless individuals via phone or in-person with these homeless services. The C.O.R.E. Team supervisors and outreach workers are required to participate in monthly meetings with San Pablo's Police Department to check-in and address any questions or concerns.



Image 7: Contra Costa County C.O.R.E. Team



Image 8: Contra Costa County C.O.R.E. Team

The C.O.R.E. Team also assists with counts of homeless individuals and ensures that all individuals contacted are inputted into the Homeless Management Information System (HMIS). This web-based platform helps the County's collaboration of homeless agencies collect data, coordinate care and manage operations. The HMIS can produce an unduplicated count of homeless persons, track patterns of service use and measure the effectiveness of homeless programs in the County.

#### ***Contra Costa Council on Homelessness***

Since 2018, a representative from the San Pablo Police Department has served on the Contra Costa Council on Homelessness (the Council) in a public safety seat. The Council provides a forum for the Continuum of Care (CoC) to communicate about the implementation of strategies to prevent and end homelessness. The purpose of the forum is to educate the community on homeless issues and advocate on federal, state, county and city policy issues that affect people who are homeless or at-risk of homelessness. The Contra Costa Council on Homelessness provides advice and input on the operations of homeless services, policy formulation and program development efforts in Contra Costa County. Furthermore, it establishes the local process for applying, reviewing and prioritizing project applications for funding in U.S. Department of Housing and Urban Development (HUD) Homeless Assistance Grant Competitions, including the CoC Program and the Emergency Solutions Grant (ESG) Program. The City's involvement has allowed the City to have input on the services and programs available in the County and advocate for those who are unhoused in the City.

#### ***Illegal Encampment Abatement***

The City receives regular complaints and concerns regarding illegal encampments on public and private properties. Inadequate water, sanitary facilities and trash receptacles at encampment sites create an unhealthy living environment and are considered a public nuisance. The City's Code Enforcement Division provides a written notice ("red tag") no less than 72 hours in advance of an intended clean-up. The red tag includes an attachment describing local services that offer assistance and resources. Prior to the notice being served, Code Enforcement will contact the C.O.R.E. Team to provide additional information regarding services available. On the day of the clean-up, staff photograph the area and collect any garbage and/or debris. Any personal property deemed of value that has not been intentionally abandoned is collected, photographed, recorded and stored on City property for 90 days by the Public Works Department.

In order to prevent the re-establishment of encampments in areas deemed a safety or human health hazard (e.g. in the creek), the City implements deterrence actions, such as vegetation trimming, barriers, signage and extra patrolling.

## **Section 4: Assessment and Monitoring**

The City monitors and reports on a variety of trash control metrics in its MRP Annual Report. In addition to the information reported in the MRP, the City plans to collect data regarding the trash reduction effectiveness associated with actions described in this *Direct Discharge Plan*. The City will perform assessments and monitoring of litter, illegal dumping, encampments, enforcement and outreach efforts:

- **Litter** – Efforts to reduce litter in San Pablo will be tracked by annual On-Land Visual Trash Assessments (OVTAs). OVTAs will be conducted on a regular basis to allow for year-to-year and



baseline comparisons. Staff will also analyze the data collected by EarthTeam to identify litter hotspots and recurrent litter types, which can help inform future source bans and policies.

- **Illegal Dumping** – The Public Works Maintenance Division will continue to track illegal dumping, including the number of work orders, tonnage removed, location and item types. These data will be evaluated to assess program effectiveness and inform next steps.
- **Homeless Encampments** – Encampments will be tracked through tonnage of debris removed, number of encampments and location hotspots. It should be noted that, even with a variety of City and County programs, homelessness is a statewide issue that is influenced by a multitude of outside factors and will be difficult to accurately track. Individuals may move regionally and San Pablo is a small city that is influenced by the larger cities around it.
- **Outreach** – In order to assess whether the outreach and education campaign has reached the community, a pre-survey will be given to residents and businesses to assess their base knowledge of available programs with a follow-up survey after the program has been implemented. This yearly follow-up will also ask residents about knowledge of these programs. Staff will review social media metrics and engagement to understand how many users view and interact with targeted advertisements. Staff will also monitor the use of the provided programs.
- **Enforcement** – The Code Enforcement Division will track parking violations, as a proxy for street sweeping effectiveness, and litter/dumping violations. The City aims to prosecute in a case of illegal dumping and will similarly track successful prosecutions.

Based on the evaluations listed above, the City will track the effectiveness of the actions described in this *Direct Discharge Plan* and adapt on an ongoing basis.

## Section 5: Funding Sources

The recommendations from the Litter and Illegal Dumping Task Force, as described above, are estimated to cost \$745,000 in FY 2020/21. Once the City identifies the appropriate approach to pursue, funding sources may use a combination of West Contra Costa Integrated Waste Management Authority/Recyclemore (WCCIWMA) funds, the City's General Fund, grants or other funding sources. The recommendations from the Task Force require ongoing annual costs of approximately \$445,000. Any revenue generated from a potential Excess Litter Fee would be reinvested in the litter and illegal dumping reduction efforts. The City is constantly applying for grant funding to continue improving and creating programs; however, this funding is based on availability and applicant success. The City is exploring a State budget earmark in FY 2020/21 to provide supplementary funding.

## Section 6: Conclusion

The City is requesting approval from the San Francisco Bay RWQCB Executive Officer to claim the maximum 15% trash load reduction offsets through implementation of this comprehensive management plan, as allowed in Section C.10.e.ii of the Municipal Regional NPDES Permit.