Direct Discharge Trash Control Program Plan Approval

Kerrie Romanow, Director, Environmental Services Department
Rajani Nair, Deputy Director, Environmental Services Department
Ragan Henninger, Deputy Director, Housing
Andrea Flores Shelton, Deputy Director, Parks and Recreation Neighborhood Services

December 13, 2022
Item 6.5

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National Pollution Discharge Elimination System (NPDES) Permitting Authority

U.S. EPA

↓

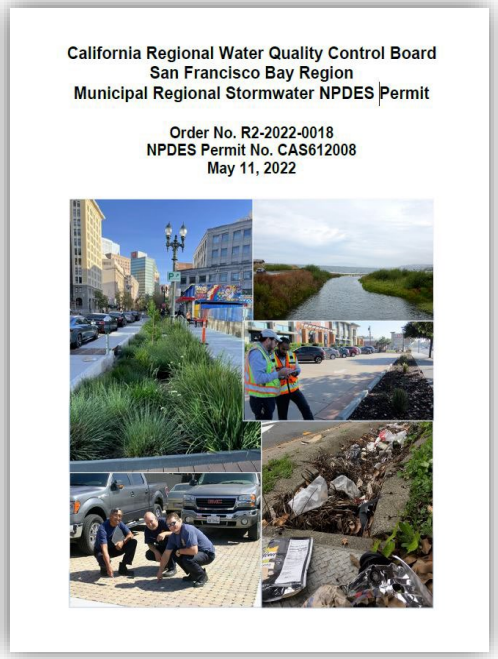
State Water Resources Control Board

↓

Regional Water Quality Control Board (9 regions)

↓

MS4* (NPDES)



California Regional Water Quality Control Board
San Francisco Bay Region
Municipal Regional Stormwater NPDES Permit

Order No. R2-2022-0018
NPDES Permit No. CAS612008
May 11, 2022

1968 Porter – Cologne Act – EPA authorizes State Water Resources Control Board

* MS4 = Municipal separate storm sewer system

Municipal Regional Stormwater Permit Provisions – Effective July 1, 2022

Permit Provision*		City Departments								
		ESD	DOT	Housing	PBCE	PRNS	PW	Airport	Fire	OED
C.2	Municipal Operations		✓			✓	✓			
C.3	New Development and Redevelopment (GSI)		✓		✓		✓	✓		
C.4	Industrial and Commercial Site Controls	✓								
C.5	Illicit Discharge and Detection Elimination	✓	✓							
C.6	Construction Site Control	✓					✓			
C.7	Public Information and Outreach	✓				✓				
C.8	Water Quality Monitoring	✓								
C.9	Pesticides Toxicity Control	✓	✓			✓	✓	✓		
C.10	Trash Load Reduction	✓	✓	✓		✓	✓			✓
C.11, C.12, C.13	Mercury, PCBs, and Copper Controls	✓	✓		✓		✓			✓
C.15	Exempted and Conditionally Exempted Discharges		✓		✓				✓	
C.17*	Discharges Associated with Unsheltered Homeless Populations			✓		✓				
C.20*	Cost Reporting	✓	✓	✓	✓	✓	✓	✓	✓	✓
C.21*	Asset Management	✓	✓	✓	✓	✓	✓	✓	✓	✓
C.22	Annual Reports	✓	✓	✓	✓	✓	✓	✓	✓	✓

**New provision in MRP 3.0*

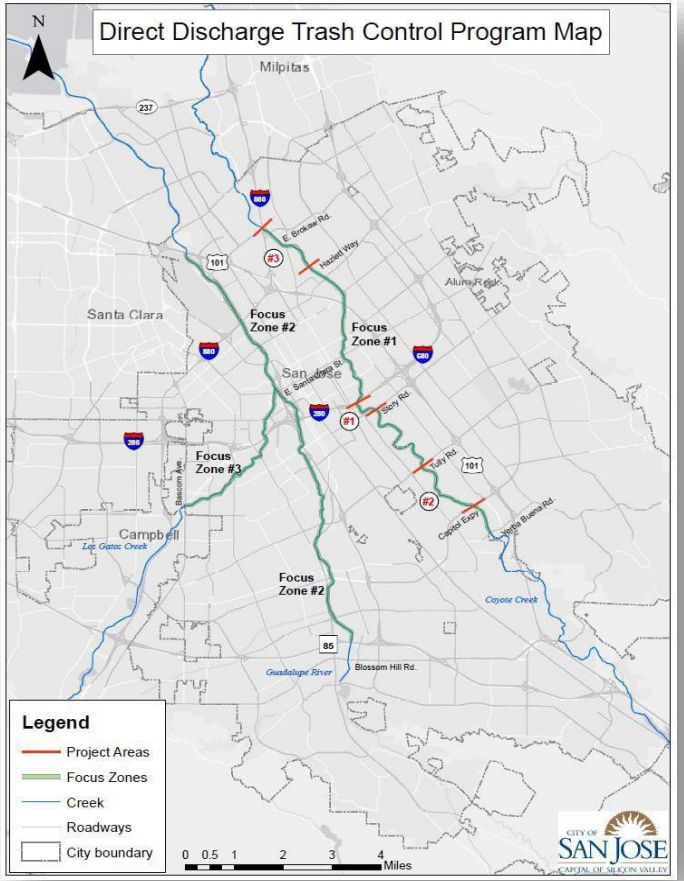
Background: Direct Discharge Trash Control Program

- First implemented in 2016
- Plan Update Due January 3, 2023
- 15% Trash Load Reduction Credit
- Discharge Prohibition

Why It Matters?

- Waterways impaired by polluted discharges from populations experiencing unsheltered homelessness
- 3,200 tons trash removed

Fiscal Year	Removal Goal (per MRP)	Actual Tons Removed
FY 16-17	67 tons	581 tons
FY 17-18	67 tons	890 tons
FY 18-19	200 tons	526 tons
FY 19-20	186 tons	446 tons
FY 20-21	186 tons	349 tons
FY 21-22	186 tons	432 tons



Stormwater Permit Requirements for DDTCP Plan Update

- Increase emergency, transitional, and/or permanent housing
- Increase Trash and sanitary services
- Increase services such as RV safe parking areas and pump out services
- Increase services such as Social services to help unsheltered homeless transition to housing
- Prioritize housing and services to people experiencing unsheltered homelessness who are living near waterways
- Monitor, effectiveness assessment, and report

Direct Discharge Planned Programs - Housing

Community Plan to End Homelessness

- Point in Time Survey
- City/County Supportive Housing System
  - Construct new affordable housing and preserve existing affordable housing
- Expand emergency, transitional housing
- Safe Parking Program for lived-in vehicles
- Services Outreach Assistance and Resources (SOAR)
- Portable restrooms and hand washing stations, mobile showers, laundry services

Direct Discharge Planned Programs – PRNS – Encampment Management

- Trash collection services
- Cash 4 Trash
- Escalated cleanups
- Abatements
- Interagency Team
- Contract

Direct Discharge Planned Programs – Interdepartmental and Interagency

- Partnerships with Nonprofits (Keep Coyote Creek Beautiful, South Bay Clean Creeks Coalition, The Trash Punx, San Jose Conservation Corps)
- Partnerships with Valley Water, County of Santa Clara Department of Supportive Housing
- Structural deterrents
- Abandoned vehicle abatement
- Monitoring, Effectiveness Evaluation, Reporting

Next Steps

- Submit DDTCP Plan Update to Water Board by January 3, 2023
- Water Board to determine if City will be eligible to obtain the 15% credit through June 2025
- Evaluate effective programming across City Departments to meet Permit Mandates

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