CITY OF OAKLAND

AGENDA REPORT

TO:	Jestin D. Johnson City Administrator	**FROM:**	Michael Kashiwagi Director, Oakland Public Works
SUBJECT:	Stormwater Trash Load Reduction Compliance Informational Report	**DATE:**	May 13, 2024

City Administrator Approval Jestin Johnson (May 29, 2024 20:53 PDT) Date: May 29, 2024

RECOMMENDATION

Staff Recommends That The City Council Receive An Informational Report On The Status Of The City's Compliance With The Municipal Regional Stormwater Permit (MRP) Trash Reduction Requirements.

EXECUTIVE SUMMARY

This Informational Report provides a compliance update on the progress by the City of Oakland (City) to meet trash reduction requirements in the 2022 Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP 3.0), issued and enforced by the San Francisco Bay Regional Water Quality Control Board (Water Board).

Through significant financial investment in trash capture, trash management, and litter prevention actions, the City exceeded the MRP 3.0's 90 percent trash load reduction requirement for fiscal year (FY) 2022/23. However, compared to the prior iteration of the MRP, known as MRP 2.0, MRP 3.0 includes more stringent trash load reduction requirements that are phased in throughout the permit term (FY 2021/22 – 2025/26). The method for calculating trash load reduction under MRP 3.0 eliminates several categories of compliance credit upon which the City has relied. By June 30, 2025, the City must use the more stringent calculation methods to demonstrate trash load reductions of 100 percent based on benchmarks established during the first iteration of the MRP. This will require the City to install and maintain many new full trash capture devices, which will be technically challenging and costly. Other MRP 3.0 trash load reduction requirements will require significant staff time as well as consultant and contractor resources to achieve compliance.

BACKGROUND / LEGISLATIVE HISTORY

In 1987, under amendments to the 1972 Clean Water Act, the Federal Environmental Protection Agency imposed regulations that mandated control and reduction of pollutants in stormwater

runoff through the NPDES permitting program. In the Bay Area, under the authority of the Porter-Cologne Water Quality Control Act, the Water Board issues and enforces municipal stormwater NPDES permits.

The City is now regulated by the third iteration of the Municipal Regional Stormwater NPDES Permit (MRP 3.0), which was approved by the Water Board in May 2022 and applies to all municipalities throughout Alameda, San Mateo, Santa Clara, and Contra Costa counties, as well as the cities of Fairfield, Suisun City, and Vallejo. Each MRP mandates specific actions and reporting requirements. Failure by municipalities to comply with the permit requirements may result in significant enforcement action by the Water Board or legal actions by third-party entities.

On April 25, 2023, Oakland Public Works (OPW) presented an informational report to the Public Works and Transportation Committee regarding the status of compliance with the trash load reduction requirements in the MRP. This report followed informational reports presented on February 22, 2022, April 30, 2021, February 25, 2020, February 19, 2019, and April 25 and October 24, 2017. This report responds to the Committee's request for an annual update on the City's comprehensive trash reduction strategy, including programs and activities, compliance status, and next steps to meet future requirements.

ANALYSIS AND POLICY ALTERNATIVES

This section provides a compliance update on how the City met the FY 2022/23 MRP 3.0 trash load reduction requirements by June 30, 2023, including a description of all compliance trash load reduction programs. It also describes the MRP 3.0 trash load reduction requirements and compliance costs. Compliance with MRP stormwater requirements to protect Oakland's creeks and the San Francisco Bay support the City's goals of building **vibrant, sustainable infrastructure** and being a **responsive, trustworthy government**, respectively.

FY 2022/23 Trash Load Reduction Programs and Compliance Status

By June 30, 2023, under MRP 3.0 Provision C.10, "Trash Load Reduction," the City was required to reduce trash loads from the City's storm drainage system to waterways by 90 percent based on trash generation rate benchmarks set during the first MRP permit term (MRP 1.0 was in effect from 2009-2015). "Trash generation" is a term used to describe the level of trash deposited onto land areas that could potentially be transported to the storm drainage system and waterways. The trash generation rate benchmarks (baseline trash levels) were calculated using a formula that includes land use classifications, median household income, and observed trash levels. To ground truth the baseline trash levels in Oakland, staff followed an MRP-sanctioned methodology to confirm or refine the level of trash generation based on local knowledge and assessments. Through this process, staff developed a map depicting four types of trash generation areas throughout the City: Very-High, High, Moderate, and Low (see ***Attachment A*** – Baseline Trash Generation and Full Trash Capture Systems Map). The method for calculating percent trash load reduction from a given trash generation area is prescribed in MRP 3.0 and is specific to the type of trash control action implemented (for example, some trash control actions provide credits or offsets, and others provide actual volumes of trash removed).

In the most recent annual report to the Water Board, which covered FY 2022/23 compliance activities, the City documented compliance with the MRP 3.0 mandate to reduce trash loads by 90 percent of the baseline trash levels (using the MRP 3.0 calculation method, the City reduced trash loads by more than 92 percent by the July 1, 2023 deadline). Compliance was achieved through numerous efforts, including installing underground full trash capture systems in the City's storm drainage system, and many City initiatives designed to remove and limit trash in the streets and adjacent areas to help keep it out of storm drains and waterways. These initiatives are further described below and include but are not limited to Oakland's Excess Litter Fee Program, the Business Improvement Districts, the street sweeping program, cleanup of illegal dumping sites and homeless encampments, and volunteer litter cleanup programs and events.

In FY 2022/23, the City was allowed to take trash reduction credits, per the MRP 3.0 requirements, in four established trash load reduction program categories (credit for source control programs were no longer allowed in FY 2022/23):

1. Full trash capture systems
2. Creek and shoreline cleanups
3. Direct Trash Discharge Control Program
4. Other control measures

Table 1 below provides a summary of Trash Load Reduction Action categories and corresponding reduction credits for FY 2021/22 and FY 2022/23.

Table 1: Trash Reduction Credit Summary

Trash Load Reduction Action	FY 2021/22	FY 2022/23
1) Full trash capture systems	11.5%	11.5%
2) Creek & shoreline cleanups	10.0%	9.5%
3) Source control actions*	10.0%	0%
4) Direct Trash Discharge Control Program	15.0%	15%
5) Other control measures**	61.5%	56.8%
TOTAL	>100%	92.8%

** This category includes plastic bags and polystyrene product bans. Starting in FY 2022/23, only new source control actions can be credited under MRP 3.0. To claim a load percentage reduction value, Permittees must provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and that trash is reduced by the claimed value. The City is not pursuing new source controls for trash reduction credit because jurisdiction-wide credit cannot be claimed after June 30, 2025.*
*** This category includes Business Improvement Districts and Excess Litter Fee activities, street sweeping, illegal dumping, homeless encampment cleanup, Adopt-a-Spot, and other on-land cleanup efforts.*

1. Full Trash Capture Systems

Full trash capture (FTC) systems are devices installed in storm drainage infrastructure that collect trash before it enters nearby waterways. The two main types of FTC devices are large underground units, such as hydrodynamic separators, that capture trash as stormwater flows through the storm drainage system, and connector pipe screens, which are metal screens

installed in storm drain inlets that trap trash and prevent it from entering the storm drainage system.

FTC devices are an effective method for preventing trash from entering waterways, and they ensure full trash reduction credit for the area draining to them; however, there is an initial investment to install them, and they are expensive to maintain. Also, because the FTC devices are underground solutions, they do not provide cleaner streets and neighborhoods, and therefore do not necessarily enhance the quality of life for residents.

By June 30, 2023, the City had installed 209 FTC devices, which treat over 1,200 acres of Moderate, High, and Very-High trash generating areas, resulting in a total of 11.5 percent reduction credit. The FTC devices are primarily installed in conjunction with capital improvement and transportation projects (see ***Attachment A*** – Baseline Trash Generation and Full Trash Capture Systems Map).

2. Creek and Shoreline Cleanups

Through June 30, 2025, the City can receive a maximum available annual trash load reduction credit of 10 percent in this category through the implementation of numerous trash removal/cleanup events, such as the annual Earth Day and Creek to Bay Day events, as well as at Lake Merritt, local creeks, and on the Bay shorelines. Over 465,000 gallons of trash were removed from local waterways during FY 2022/23, resulting in the City receiving a 9.5 percent trash load reduction credit.

3. Direct Trash Discharge Control Program

In FY 2022/23, the City received the maximum available trash load reduction credit of 15 percent for implementing a Direct Trash Discharge Control Program. This program, approved by the Water Board in April 2019 and reauthorized in August 2023, allows the City to receive trash reduction credit for its activities and programs that reduce the impacts of trash from homeless encampments and illegal dumping into local creeks and the storm drain system within 500 feet of a waterway. In FY 2022/23, the City removed more than 10 million gallons of trash from streets, parks, and public rights-of-way through these programs, over 8 million gallons of which were within 500 feet of a waterway and hence eligible for credit. To receive the full 15 percent trash reduction credit available in this category, the City must remove a minimum of 735,000 gallons within 500 feet of a waterway each fiscal year. The Direct Trash Discharge Control Program allows the City to leverage the enormous efforts already devoted to illegal dumping and homeless encampment litter abatement to receive valuable trash reduction credit. Under MRP 3.0, this credit (or “offset” as described in the MRP) will be available through December 31, 2025.

4. Other Control Measures

In FY 2022/23, the City received 56.8 percent trash reduction credit for other control measures. This category measures the effectiveness of many of the City’s above-ground trash reduction efforts, including:

- **Street Sweeping:** Continuing the City's street sweeping program is the most widespread trash control measure that targets High and Very-High trash producing areas, including downtown, business districts, and major arterials, with three (3) or more sweeping operations per week. The City has posted signs on all routes, has a rigorous enforcement program, and spends more than $5 million dollars on street sweeping operations annually.

- **Adopt-a-Spot Program:** The City manages an award-winning Adopt-a-Spot program that supports individuals, neighborhood groups, civic organizations, and businesses in the ongoing cleaning and greening of parks, creeks, shorelines, streets, trails, and other public spaces. In FY 2022/23, volunteers contributed over 90,000 on-land clean-up hours at adopted spots and parks citywide.

- **Adopt-a-Drain Program:** The Adopt-a-Drain program enhances the City's efforts to clean up storm drains throughout the city. More than 1,600 of the City's estimated 13,600 storm drains have been adopted since the program began in 2002.

- **Excess Litter Fee Program:** The City's Excess Litter Fee Program is conducted near fast-food businesses, convenience markets, gasoline station markets, and liquor stores. Fees collected under this Program provide funds for a contracted crew to remove trash around businesses that sell/provide large amounts of disposable materials to customers. The contracted crew services over 800 business sites throughout the city and focuses on known locations of high street litter and illegal dumping.

  Business Improvement Districts (BIDs): There are 10 BIDs in neighborhood commercial areas throughout the City. These organizations hire full-time staff to remove litter and dedicate funding to maintain trash containers, manage the number and capacity of trash containers needed, install and maintain cigarette butt receptacles, and install public anti-litter signage.

To calculate trash reduction credit in this category (Other Control Measures), the City is required to conduct visual assessments of street segments using a Water Board-approved protocol developed by permittees in 2015 known as On-land Visual Trash Assessments (OVTAs). The protocol provides qualitative estimates of the amount of trash on the streets that may be carried into the storm drain system as observed through field assessments along a designated percentage of randomly selected stretches of street in each trash management area (the MRP required the City to establish trash management areas throughout the City). A category of trash condition, from Low to Very-High, is assigned to each trash management area based on OVTA trash count and visual condition as recorded through photographs. The assigned trash condition determines if the area qualifies for trash reduction credit using the standardized formula in the protocol. The past eight years of OVTAs have demonstrated that in some areas of the city, trash reduction activities such as enhanced trash removal by the BIDs, Adopt-a-Spot volunteer efforts, and the three times or more a week of street sweeping in commercial areas and downtown have reduced the amount of trash found from Very-High to Moderate trash levels.

More information about the City's trash load reduction program, including its purpose, permit requirements, and compliance status, is available in the City of Oakland Annual Report to the

Water Board: https://cao-94612.s3.us-west-2.amazonaws.com/documents/Oakland-MRP3-FY-22-23-AR_Final-Report.pdf.

Municipal Regional Permit 3.0 Trash Reduction Requirements

By June 30, 2026, MRP 3.0 will phase-out compliance credits for which the City currently receives 24.5 percent of its trash reduction credit. This will make it more difficult for the City to meet the permit's 100 percent trash load reduction requirement. In addition, the City is not pursuing the 10% source control credit (e.g., single-use plastic foodware bans) as it requires substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and trash is reduced by the claimed value, and the jurisdiction-wide source control credit cannot be claimed after June 30, 2025.

By June 30, 2025, the City must achieve 100 percent trash load reduction, but may take 15 percent credit for effective and full implementation of the Direct Trash Discharge Control Program until December 31, 2025, and may take 10 percent credit for the Creek & Shoreline Cleanups until June 30, 2026, at which time the credits expire.

To achieve compliance, the City will need to install a significant number of FTC devices in the public right-of-way, implement a new MRP 3.0 mandated program – the Private Land Drainage Area Control Program, and continue implementing all the aforementioned trash management measures and conduct OVTAs.

Through the Private Land Drainage Area Control Program, the City must require private property owners in Moderate, High, and Very-High trash generating areas with private storm drainage systems that connect underground to the City's storm drainage system to install and maintain approved FTC devices or meet Full Trash Capture Equivalency. This means that virtually zero trash can be discharged from a private storm drainage system to the City's system. In Oakland,, approximately 870 parcels fall under this property category.

Ongoing and Planned Compliance Actions and Estimated Costs

In addition to the ongoing implementation of trash control program measures summarized above that contributed to the City achieving the 90% trash load reduction benchmark with trash load reduction offsets and credits allowable under MRP 3.0, the City is implementing the control measures summarized in this section to achieve the 100% trash load reduction benchmarks without the use of offsets and credits. The planned schedules for implementation of these measures are described below. **Table 2** below summarizes how the City will achieve the 100% trash load reduction benchmark in specific trash reduction action categories.

Table 2: Trash Load Reduction Credits

Trash Load Reduction Action	FY 2023/24	FY 2024/25	FY 2025/26
1) Full Trash Capture Systems*	11.5%**	33.5%	33.5%
2) Creek & Shoreline Cleanups	9.5%	9.5%	0%
3) Source Control Actions***	0%	0%	0%
4) Direct Trash Discharge Control Program	15.0%	15.0%	0%
5) Other Control Measures****	56.8%	56.8%	56.8%
6) Private Land Drainage Area Control Program	0%	13.3%	13.3%
Total*	92.8%	128.1%	113.1%
Compliance Requirement	90%	100%	100%
Trash Credits Needed	-	-	-

** This category includes the installation of FTC systems. Accounting for trash reduction credits is based on drainage area and is an estimate at this time. The City will adjust the number of FTC systems to be installed based on credit received and a margin of error to maintain compliance with the 100% trash reduction benchmark.*
***In FY 2023/24, approximately 143 small FTC devices are being installed in the public right-of-way. The percentage trash load reduction will be calculated in August 2024 for annual reporting.*
**** This category includes plastic bags and polystyrene product bans. As of July 1, 2022, only new source control actions can be credited under MRP 3.0. To claim a load percentage reduction value, Permittees must provide substantive and credible evidence that new source control actions are being implemented jurisdiction-wide and trash is reduced by the claimed value. The City is not pursuing trash reduction credit under this category.*
***** This category includes results of OVTAs, which are subject to variability based on the levels of trash observed on the streets and sidewalks.*

Installation of Full Trash Capture Systems

The City will use existing bond funding, transportation funding, capital project funding, and grants to install the estimated number of FTC devices needed to meet and maintain the 100 percent trash load reduction requirement in MRP 3.0. The City Council has provided direction to staff on several occasions to look for opportunities for FTC implementation.

- On June 12, 2017, the City Council adopted Resolution No. 86773 C.M.S. for the identification of Capital Improvement Projects funded by the General Obligation Bond (Measure KK), including the adoption of a Trash Capture Transportation Map that showed transportation project locations in high trash generation areas to ensure that those projects incorporate FTC as feasible.
- On June 12, 2018, the City Council adopted Resolution No. 87238 C.M.S., authorizing the City to enter a Cooperative Implementation Agreement with Caltrans for a large FTC project in the Ettie Street watershed. Caltrans was not able to proceed with the agreement at that time, but the terms of the agreement have now been finalized, and

Caltrans will provide $6.9 million for the Mandela Parkway at 24th Street Full Trash Capture project that is estimated for construction in 2024.

- On November 14, 2019, the City Council adopted Resolution No. 87919 C.M.S. authorizing the submission of an Ordinance on the March 3, 2020, Statewide Primary Election ballot for a 20-year parcel tax to raise revenues necessary to maintain, protect, and improve parks and recreational facilities and services, to provide homeless support services, and to improve water quality. Oakland voters passed Measure Q, which provides $21 million annually with approximately $1 million per year for stormwater system improvements and trash reduction efforts, including FTC installation. Measure Q funds will be used in FY 2023/24 and FY 2024/25 to install approximately 350 FTC devices by June 30, 2025.
- On June 21, 2022, the City Council adopted Resolution No. 89257 C.M.S., authorizing the City to enter a Cooperative Implementation Agreement with Caltrans for a large FTC project in the Cary Avenue watershed. Through this agreement, Caltrans will provide $2.3 million for the Cary Avenue Full Trash Capture Project in East Oakland.
- On February 20, 2024, the City Council adopted Resolution No. 90103 C.M.S. authorizing the City Administrator to award a construction contract for the Mandela Parkway Trash Capture Project for an amount not to exceed $3,719,333.00 and the Cary Avenue Trash Capture Project for an amount not to exceed $3,036,145.00.

The City plans to spend approximately $13.51 million to implement FTC projects between FY 2023-26; however, the total cost to implement FTC projects is contingent on construction contract bidding at the time of implementation. The City will adjust the number of FTC systems to be installed based on trash reduction credit received and a margin of error to maintain compliance with the 100% trash reduction benchmark. The City will implement the following 1,869 FTC projects (and will adjust the total number as needed):

- Install approximately 80 small FTC devices (known as connector pipe screen (CPS) units) as part of the Active Transportation Program 20th Street Project, Highway Safety Improvement Program Cycle 7 Telegraph Avenue Improvement Project, Fruitvale Alive Gap Closure Project, and International Boulevard Pedestrian Lighting Project. These devices are expected to be installed by June 30, 2025. So far, 43 of the 80 total small FTC devices have been installed.
- Install approximately 250 CPS units as part of the Sewer Rehabilitation Program by June 30, 2025. One hundred of these devices will be installed by June 30, 2024.
- Install up to 1,200 CPS units in Very-High, High, and Moderate trash generating areas receiving paving rehabilitation as part of the 3-Year Paving Program. These devices need to be installed by June 30, 2026.
- Install up to 350 CPS units in Very-High, High, and Moderate trash generating areas using Measure Q funding. These devices need to be installed by June 30, 2025.
- Install two large FTC devices, one in the Ettie Street watershed and one in the Cary Avenue watershed, with funding from Caltrans. Both projects are in construction and are scheduled to be completed by mid-October 2024. Once completed, the City will receive a 9.7% trash load reduction credit.

- A feasibility study conducted by the OPW Watershed and Stormwater Management Division identified three additional locations to install large FTC devices – at 45th Avenue and San Leandro Street, 47th Avenue and Union Pacific Railroad, and 85th Avenue and G Street. Staff are discussing these locations with Caltrans to determine if design and construction funding is available. Both Caltrans and the City received encouragement from the Water Board to pursue these locations. If these or other large full trash capture projects are feasible to fund and build, the number of small FTC devices needed for compliance would decrease, thereby significantly reducing future FTC maintenance costs. Construction of one or more large FTC projects could be completed as soon as the fall of 2027 or 2028. Water Board staff stated they would extend compliance timelines if the City committed to installing additional large FTC devices.

In addition, estimated annual maintenance costs will triple for storm drains with installed FTC devices, which will increase capital costs for maintenance equipment as well as annual labor costs.

Implementation and Expansion of Other Control Measures

The City continues to implement numerous trash control programs and ongoing actions to remove litter in streets, parks, and other publicly-owned spaces before it enters inlets and waterways, including volunteer programs and events, the Excess Litter Fee Program, BIDs, street sweeping program, the Direct Trash Discharge Control Program, and cleanup of illegal dumping sites and homeless encampments. Moving forward, new actions the City will explore and/or undertake include, but are not limited to:

- Examine the fee structure, fee amount, and definition of Excess Litter Fee program-eligible businesses.
- Work with stakeholders to encourage the formation of BIDs in new areas. The City's Economic and Workforce Development Department continues to assist businesses and other stakeholders with BID feasibility efforts, including in East Lake/Little Saigon, Dimond, Fruitvale, Oakland Airport Area, West Oakland, and Piedmont Avenue.
- Consider recommendations and findings from a 2021 citywide street sweeping evaluation on how the City can reduce trash levels on streets, reduce redundancies in trash control measures, and improve the cost-efficiency of the City's street sweeping program.
- Implement the Private Land Drainage Area Control Program as required by MRP 3.0 to ensure that private land in Moderate, High, and Very-High trash generating areas with private storm drainage systems that drain to the City's storm drainage system are equipped with full trash capture devices or are effectively managed to control trash discharges.

  In FY 2024/25, the City will assess ~870 parcels. Owners of parcels with Low trash levels will be informed that if they maintain Full Trash Capture Equivalency (FTCE), they will not need to install FTC devices. Properties determined to have Moderate to Very-High trash levels will need to be equipped with the required number of properly maintained FTC devices or demonstrate that they are maintaining FTCE through best management practices (e.g., sweeping, maintenance of trash cans, and litter cleanup).

Trash load reduction percentages achieved by this program will be calculated and help the City achieve 100 percent trash load reduction.

The cost to develop and implement this program is currently being assessed and will depend on the execution of a consultant contract, but preliminary estimates are $390-830,000 for FY 2024-26.

FISCAL IMPACT

This item is for informational purposes only and does not have a direct fiscal impact or cost. However, construction of the FTC devices comes with a significant additional staffing and equipment commitment required to service and maintain them in compliance with the MRP. If not outsourced, the responsibility will fall upon the OPW Drainage Maintenance Division within the Bureau of Maintenance and Internal Services. These are the future staffing and equipment needs are anticipated:

- Fifteen Fulltime Employees (FTE) with ongoing salary and benefits. This will allow deploying five additional Drainage crews, consisting of five Street Maintenance Leaders and ten Public Works Maintenance Workers (currently $2.1 million per year);
- One combination flusher/vacuum truck at a one-time expense of $750,000 or higher for a battery electric version;
- Four crew service trucks at a one-time expense of $180,000 ($720,000 or higher for a battery electric version); and
- Ongoing flusher/vacuum and service truck operations and maintenance of approximately $288,000 per year.

The City plans to spend approximately $13.51 million to implement FTC projects between FY 2023-26 utilizing existing Measure KK, Measure Q, and Caltrans funding. The total cost to implement FTC projects is contingent on construction contract bidding at the time of implementation.

PUBLIC OUTREACH / INTEREST

While this item is for informational purposes and did not require additional public outreach beyond the standard City Council agenda noticing procedures, many of the activities and programs described in this report include a public outreach component to educate residents about litter and illegal dumping prevention and abatement, with the goal of encouraging and fostering personal responsibility for proper disposal of unwanted items through enhancement of civic pride, re-emphasizing the laws and consequences for illegally dumping, and connecting residents and businesses with resources and support to assist them with finding the proper disposal options available to them. This includes the Adopt-a-Spot program, which fosters community engagement to clean, green, and beautify public spaces, and the Bulky Block Party events, which provide a monthly opportunity for Oakland residents to dispose of large/bulky waste items at the City's Municipal Services Center, free of charge.

COORDINATION

The Office of the City Attorney, the Budget Bureau, and the City Administrator's Office were consulted for the preparation of this report.

SUSTAINABLE OPPORTUNITIES

Economic: Although this informational report has no direct economic impacts, the continued efforts to reduce trash and litter will improve the physical appearance of the city of Oakland, which helps attract and retain businesses and promote civic pride.

Environmental*:* Although this informational report has no direct environmental impacts, the continued efforts to reduce trash and litter entering the storm drain systems improve the health of Oakland's creeks and waterways, improves water quality, protects native flora and fauna, and prevents pollutants from entering San Francisco Bay.

Race & Equity*:* Although this informational report has no direct race and equity impacts, implementation of the trash reduction programs described in this report results in cleaner, healthier, and safer communities throughout the city. Disadvantaged communities are disproportionally affected by litter and debris. The trash reduction programs implemented to comply with the MRP occur primarily in those communities and can help alleviate some of the impacts of environmental injustice and racial disparities.

ACTION REQUESTED OF THE CITY COUNCIL

Staff recommends that the City Council receive an informational report on the status of the City's compliance with the Municipal Regional Stormwater Permit (MRP) trash reduction requirements.

For questions regarding this report, please contact Terri Fashing, Acting Watershed and Stormwater Division Manager, at (510) 238-7276.

Respectfully submitted,

MICHAEL KASHIWAGI
Director, Oakland Public Works

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Terri Fashing, Acting Watershed and Stormwater and DD Bond Manager
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Attachments (1):
A: Baseline Trash Generation and Full Trash Capture Systems Map