



# City of Berkeley ZERO WASTE COMMISSION Regular Meeting

Tuesday, October 24, 2023 at 6:00 p.m.  
City of Berkeley Corporation Yard (Ratcliff Building, Willow Room)  
1326 Allston Way, Berkeley, CA, 94702

## MEETING AGENDA

### PRELIMINARY MATTERS:

- 6:00 pm      1. Call to Order by Chair and Roll Call by Secretary
- **Steven Sherman (Chair)**, appointed by CM Rashi Kesarwani, District 1
  - **Christienne de Tournay (Vice Chair)**, appointed by CM Sophie Hahn, District 5
  - **Corey Busay**, appointed by Mayor Jesse Arreguin
  - **Rhea Grover**, appointed by CM Terry Taplin, District 2
  - **Antionette Stein**, appointed by CM Ben Bartlett, District 3
  - **Holly Scheider**, appointed by CM Kate Harrison, District 4
  - **Sandra Curtis**, appointed by CM Susan Wengraf, District 6
  - **Swasti Johri**, appointed by CM Rigel Robinson, District 7
  - **VACANT**, appointed by CM Mark Humbert, District 8
- 6:05 pm      2. Approve Meeting Agenda and Order of Agenda Items
- 6:10 pm      3. Approve Draft Action Minutes:
- July 27, 2023 Regular Meeting\*
  - No minutes for September 26, 2023 – meeting cancelled due to lack of quorum
- 6:15 pm      4. Public Comment on Items Not on the Agenda  
*Speakers are allotted up to two minutes. Speakers may be allotted less time at the discretion of the Chair.*
- 6:25 pm      5. Commissioner Announcements  
*Commissioners may make general announcements; no action will be taken.*
- 6:30 pm      6. Staff Updates:
- Progress on SB-1383 Implementation
  - SUDs Ordinance Enforcement
  - Plastic Bag Ordinance
  - Staffing
  - Transfers Station Rebuild

### DISCUSSION AND ACTION ITEMS:

*Members of the public may provide comments at the end of each discussion item and prior to the vote of the Commission on any action items. Speakers are allotted up to 2 minutes.*

Internal

- 6:50 pm 1. Strategic Plan Progress Report (Chrise)
- 7:10 pm 2. Report out from the Sub-Committee to Review Green Building Requirements
- 7:20 pm 3. Review and Recommend Updated Language to AR 3.5 on Disposal of Surplus Property
- 7:30pm 4. Buoy Presentation (Rene Hallen)
- 7:50 pm 5. Discuss Legislative Updates
- 7:55 pm 6. Discuss Future Agenda Items
- 8:00 pm 7. Adjournment

**INFORMATION ITEMS:**


*Information items may be moved to discussion but no action will be taken.*

**COMMUNICATIONS:**

*Communications from the public are included as links or attachments in the agenda packet.*

**\*Indicates material included in the agenda packet**

**\*\* Indicates material to be available at the meeting**

 **ADA Disclaimer:** This meeting is being held in a wheelchair-accessible location. To request a disability-related accommodation(s) to participate in the meeting, including auxiliary aids or services, please contact the Disability Services Specialist at 981-6418 (V) or 981-6347 (TDD) at least three business days before the meeting date. Please refrain from wearing scented products to this meeting.

**SB 343 Disclaimer:**

Any writings or documents provided to a majority of the Commission regarding any item on this agenda will be made available for public inspection at the Public Works Department located at the address below.

**Communications Disclaimer:**

Communications to Berkeley boards, commissions or committees are public record and will become part of the City's electronic records, which are accessible through the City's website. Please note: e-mail addresses, names, addresses, and other contact information are not required, but if included in any communication to a City board, commission or committee, will become part of the public record. If you do not want your e-mail address or any other contact information to be made public, you may deliver communications via U.S. Postal Service or in person to the secretary of the relevant board, commission or committee. If you do not want your contact information included in the public record, please do not include that information in your communication. Please contact the secretary to the relevant board, commission or committee for further information.

Internal

**Commission Secretary:**

Julia A. Heath, Recycling Program Manager,  
Zero Waste Division, 1201 Second St. Berkeley, CA 94710  
510-981-6357

[jheath@berkeleyca.gov](mailto:jheath@berkeleyca.gov)

Internal

**From:** Dan Knapp <[dr.ore@urbanore.com](mailto:dr.ore@urbanore.com)>

**Date:** October 13, 2023 at 12:35:10 AM PDT

**To:** John Moore <[jmoore@recyclelaw.com](mailto:jmoore@recyclelaw.com)>, Igor Tregub <[itregub@gmail.com](mailto:itregub@gmail.com)>, CHRISE de Tournay Birkhahn <[cdetournay@comcast.net](mailto:cdetournay@comcast.net)>, Ruth Abbe <[ruth.abbe@abbeassociates.com](mailto:ruth.abbe@abbeassociates.com)>, Pamela Belchamber <[pbelchamber@earthlink.net](mailto:pbelchamber@earthlink.net)>, Martin Bourque <[martin@ecologycenter.org](mailto:martin@ecologycenter.org)>, Annette Poliwkha <[apoliwka@gmail.com](mailto:apoliwka@gmail.com)>, Steven Sherman <[stevenericsherman@gmail.com](mailto:stevenericsherman@gmail.com)>, Jesse Arreguín <[jesse@jesse.vote](mailto:jesse@jesse.vote)>, Kate Harrison <[katha76@gmail.com](mailto:katha76@gmail.com)>, CITY Sophie Hahn <[SHahn@cityofberkeley.info](mailto:SHahn@cityofberkeley.info)>, Ben Bartlett <[bbartlett@cityofberkeley.info](mailto:bbartlett@cityofberkeley.info)>

**Cc:** Mary Lou Van Deventer <[marylouvan@urbanore.com](mailto:marylouvan@urbanore.com)>

**Subject:** Please join me regarding the Zero Waste Transfer Station

To all:

I'm hoping you will review this argument that I submitted timely as a response to the City of Berkeley's Notice Of Presentation (NOP). The stated purpose of the NOP document is to solicit public comment on the environmental impacts attending the current plan for rebuilding the City's Zero Waste Transfer Station.

This is an excerpt, not the whole thing. I've attached a copy of my entire response for those who may want to read more.

Note that my public comment takes a quick look at three designs put forward by the last public process the City sponsored for the renewal. That process began with great fanfare and started more than three years ago. It concluded a couple of years later. Then there was a pause. Now the people leading the Zero Waste Division have changed.

For some reason, and in some way, some group of people have ignored all the previous public process and engineering work. They have substituted a completely new design, perhaps thinking they know better than the previous consultancy. They don't. It seems that someone hired a new consulting firm with no public process that I know of. I don't know who the people are who did this. But **I believe that if this fifth plan for the transfer station rebuild were to be built, it would be a monumental waste of public funds that would make real recycling harder on a daily basis for thirty years or more. Berkeley's history of recycling envisioning and achievements would be ignored and an inferior garbage-based design would sit like an unfriendly spider in the place where a potentially excellent facility could be built.**

The Planning and Development Department isn't to blame for this error. The project management seems to have been shifted from the Zero Waste Division to Planning and Development late in the game. I'm guessing that Planning and Development had little to do with the details. How did this shift happen? It might be a good idea if done well, but this is a stumble. The public deserves to know what happened, and to participate in the design process - as they did before.

Also note that I provide at the very bottom a comprehensive list of the environmental policies and preferences of the City of Berkeley that would be harmed if this terrible design were built. These are questions that an honest EIR process would have to answer.

My comments covered the design's materials flow and handling, including resources brought by self-haul customers, and I covered these points: The best and most efficient transfer station designs start with reuse, follow reuse with recycling for five post-consumer resource streams, provide equipment and handling for six more under the general heading of composting, and wasting is the last resort. Most incoming self-haul customers will have loads comprised of different source-separated materials. They have to be able to move freely from one unloading platform to another. Internally, materials also need to be moved from one specialist recovery business to another. To engage in resource recovery is to practice resource trading. Interrupting the internal flow with parking makes no operational sense. All of my 43 years in the reuse and recycling business convince me that this is a fatal flaw.

The NOP not only doesn't pick one of the previous plans as best, it doesn't even mention the previous work. There is no explanation of why the previous options were all deemed so insufficient that they had to be supplanted by a plan that is inferior. It appears that the consulting organization picked for the NOP was different from the one that did the conceptual planning. Why fix something that wasn't broken?

I was a participant in these meetings until a heart attack that I survived made my further participation impossible. In the three years since the Collaborative's excellent work concluded, I assumed that one of the three would be the subject of an EIR. But that is not what has happened.

The shift from those plans to this one must be explained.

**Here is what the Zero Waste Collaborative provided as Project Goals in their 28-page illustrated report 'Public Workshop Series #3, From Concept to Plan.'**

- 1. State of the art Zero Waste Transfer Station.**
- 2. Maximize recovery of reusable and recyclable materials.**
- 3. Highest and best use of recovered materials.**
- 4. User-friendly for customers, city staff, city contractors.**

The NOP further states "the City has determined that the proposed project could result in potential environmental impacts in the following topic areas..." There follow 15 generic environmental impacts that could apply to any proposed project for any purpose.

But this is not an ordinary project. It is - or should be - a Zero Waste transfer station, an innovative development headed into the future. Berkeley adheres to a higher standard for its resources, and generic environmental impact topics are not sufficient to the purpose at hand.

**The EIR should be congruent with existing and past Berkeley policy preferences, and here the City Planning and Development Department needs to add the following topic areas to the generic list:**

- Ability to meet City Zero Waste goals, with 'Zero' meaning zero.**

- **Ability to predict the increase or decrease in recovery of reuse, recycling, and composting commodities -- by category -- using the city's adopted methodology of 12 Market Categories, which the Zero Waste Collaborative got from Urban Ore.**
- **Ability to manifest Berkeley's goal of highest and best use.**
- **Ability to eliminate cross-contamination by proven source separation methods.**
- **Ability to reward supply customers for effective recycling behavior.**
- **Ability to maximize source separation.**
- **Ability to maximize number and placement of income portals to enhance economic development.**
- **Ability to facilitate and encourage internal trading between specialist contractors.**
- **Flexibility and ability to adapt to changes in the amount and quality of resource flows.**
- **Ability to maximize income from tipping fees for different materials.**
- **Ability to maximize jobs from upgrading incoming materials and selling them.**

.....

To help the Planning and Development team do its work, I attached a PDF of the UODA design, with permission from Berkeley architect Greg VanMechelen. Any reader of this critique will find the ideas uncommonly helpful.

Please join me in helping the Planning and Development Department improve their plan before a big mistake is made on this major piece of community infrastructure. Large amounts of money are involved, as well as a long period of time and large volumes of resources that could generate either expense, pollution, and liability, or products, income, and jobs. We need to get this right. Please tell Planning and Development that doing this EIR well is important.

Sincerely yours,

Daniel Knapp, Ph.D.  
General Manager  
Urban Ore, Inc.  
[900 Murray St.](#)  
[Berkeley, CA 94710](#)  
Mobile 510-914-0074

# Berkeley Foodware Reduction Ordinance

Ecology Center's Outreach and Scorecard Effort



Martin Bourque  
Executive Director

CRRA  
August 2023

# Partnership

Ecology Center

UCB Zero Waste Lab

Plate Up

City of Berkeley

Remark.eco

Chancellor's Community  
Partnership Fund Grant





# Field Assessment

Simplified UCB Zero  
Waste Lab Data  
Collection Tool (Google  
Form)

Reviewed with UCB, Plate  
Up, City Staff

Culled List of Businesses

Removed Those Under  
Study

Plate Up Conducted 112  
Assessments So Far

Section 1 of 6

## Disposable Foodware Assessment

Form description

Who is conducting this survey? \*

Short answer text

Business Name as Listed \*

Short answer text

Business Location (Street Address)

Short answer text

After section 1 Continue to next section

# Scorecard

One Rubric for Data  
Collected Through Study

One Rubric for New Data  
Collection Tool

Created Excel Macros

Scorecard, Letter and  
Resources

Sent USPS, Hand Addressed,  
1st Class Stamp

Followed Up Email From  
Remark.eco

Poor Compliance Overall, But  
Improvement

# Berkeley Foodware Scorecard

**VICTORY POINT CAFE**  
1797-A SHATTUCK AVE

## Overall Grade

**A**

<b>Reusable for Dining on Site</b>	<b>[40 / 40]</b>
Reusable Dishes and Bowls [10pts]	[ 10]
Reusable Cups (Hot and Cold) [10pts]	[ 10]
Reusable Utensils [10pts]	[ 10]
Reusable Ramekins and Side/ Sauce Cups [5pts]	[ 5]
Refillable Condiment Dispensers [5pts]	[ 5]
<b>Take Out / Delivery Foodware</b>	<b>[25 / 25]</b>
BPI Certified Compostable Containers [10pts]	[ 10]
BPI Certified Compostable Cups (Hot and Cold) [10pts]	[ 10]
BPI Certified Compostable Utensils and Accessories [5pts]	[ 5]
<b>Utensils and Accessories* by Request or Self-Serve</b>	<b>[0 / 5]</b>
Accessory foodware items by request or at a self-serve station? [5pts]	
<b>Disposable Cup Charge \$0.25</b>	<b>[20 / 20]</b>
\$.25 Charge for a Disposable Cup [5pts]	[ 5]
Cup Charge is on Receipt [5pts]	[ 5]
Cup Charge is on Menu/Signs [5pts]	[ 5]
Customer May Use Their Own Cup [5pts]	[ 5]
<b>Self-Bussing Bins</b>	<b>[10 / 10]</b>
Appropriate Recycling, Compost, and Landfill Bins are Available [5pts]	[ 5]
Bins are Properly Color Coded and Labeled [5pts]	[ 5]
<b>Total Score</b>	<b>[95/100] = 95%</b>

# Resources

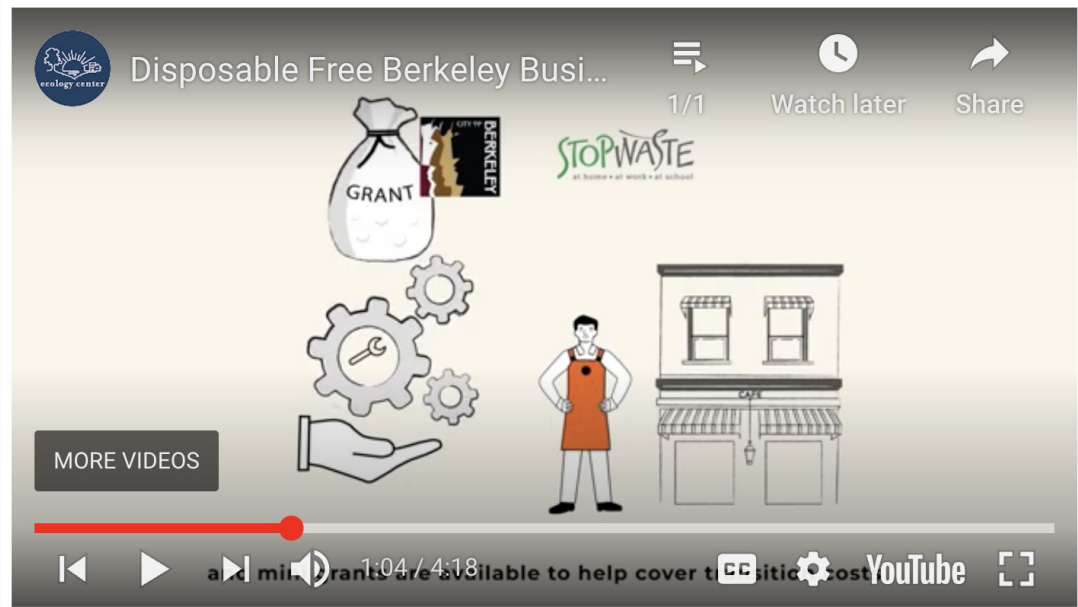
Informational Video:

Nikki Kozlowski Wisdom  
Supply Co.

City / Stopwaste

Technical Assistance:  
Rethink Disposable

Mini-Grants



**The City of Berkeley is providing FREE on-site consulting and mini-grants to help businesses comply.**

**Get Personalized Technical Assistance:**

- Personalized technical assistance with all Ordinance requirements:  
Julia Heath, City of Berkeley Recycling Manager, [customerservice@cityofberkeley.info](mailto:customerservice@cityofberkeley.info)
- Personalized technical assistance and mini-grants for reusable foodware:  
Ben Duggan, StopWaste Reusable Foodware Project, [bduggan@stopwaste.org](mailto:bduggan@stopwaste.org)

# Next Steps

Promote Best  
Actors/Practices

City Administrative Letters

City Attorney Action

Targeted Field Rep Follow Up

Env. Health Inspections /  
Check Box

Stormwater Inspectors?



**Thanks @XXXX for Your Leadership!**

**This is What a Proper Self Bussing Station  
Looks Like- All Three Bins with Great Signage  
Bonus Points fo the Extra Compost Bin!!  
Way to Go!!**

**Disposable Free Berkeley Policy Toolkit:**  
[ecologycenter.org/zerowaste/disposable-free-berkeley](http://ecologycenter.org/zerowaste/disposable-free-berkeley)

**Business Resource Landing Page and Video:**



[Martin@ecologycenter.org](mailto:Martin@ecologycenter.org)  
[@MartinRBourque](https://www.instagram.com/MartinRBourque)

# Aging Berkeley waste facility violated laws for treating stormwater, inspections show

The city settled with an environmental nonprofit this month to avoid a lawsuit over stormwater management at its trash and recycling hub. Berkeley has also responded to a notice of violations from the regional water board.

By Kate Darby Rauch  
Sept. 28, 2023, 4:14 p.m.



The Berkeley recycling station on Second Street. File photo: Supriya Yelimeli

In two independent inspections over the past year, the city of **Berkeley's trash and recycling hub** was found in violation of clean water laws.

The violations pertain to how stormwater is managed at the seven-acre Second Street **transfer station** and recycling processing site — the legally required steps the city must take to help prevent harmful pollutants from flowing or seeping into nearby creeks and the San Francisco Bay. Most regulation is under the federal **Clean Water Act**, enforced by the state **Water Resources Control Board**, and its regional offices.

Violations included clogged drains, overflowing stacks of recycled materials, lingering oily sheen and incomplete required testing and reporting. At least some were observed after last winter's heavy rainfall.

While none of the recent violations are massive, like a major toxic spill hidden in bushes or underground, collectively they paint a picture of lax or waning attention to **ongoing pollution prevention measures** at the aging and overcrowded site. The transfer station is **earmarked for a complete overhaul**, a project that's winding its way through the building permit pipeline.

“Berkeley was not in compliance,” said Julio Gutiérrez Morales, a lawyer for the nonprofit **California River Watch**, a Santa Rosa-based environmental watchdog, referring to Clean Water Act stormwater requirements. River Watch inspected the transfer station last October, based on an eyewitness tip, Gutiérrez Morales said, later sending the city **an “intent to sue” letter**. “If we can help the environment by assuring that facilities are in compliance with their permit, everyone wins, Gutiérrez Morales said.

The second inspection came in January by the **San Francisco Bay Regional Water Quality Control Board**, the local wing of the state water board. In February, the water board sent the city **a notice of violations**, with a short window to respond before facing significant fines.





Berkeley's recycling station on Friday, Sept. 22, 2023. During a visit earlier this year, water board inspectors noted overflowing stacks of recycled materials, cardboard and plastic, with falling and blowing debris. Credit: Kate Darby Rauch

The two separate, but related, inspections have kept the city busy.

In March it sent the water board a response, outlining measures taken and planned to address violations. And earlier this month, the city **announced a settlement with River Watch** committing to several actions at the sites, while admitting no wrongdoing. In exchange, River Watch said it won't sue. The city also agreed to pay for the nonprofit's legal fees of \$63,529.

"The operational changes being implemented at the Berkeley Transfer Station can reasonably be expected to reduce the amount and increase the quality of any stormwater discharged from the facility, thereby reducing the City's impact to local water resources," reads a Sept. 19 City Council report on the settlement with River Watch.

Gutiérrez Morales called the city "a good actor" for proactively addressing problems at the station rather than waiting to get sued, a goal of River Watch's legal actions.



The city owns the transfer station and adjacent recycling center, but contracts with Community Conservation Center for most of its recycling operations and with the Ecology Center for curbside pick-up.

Berkeleyside asked the city to comment on the violations, and while staff shared documents quickly, no statement was issued in time for publication.

### **Violations include backed up drains and failure to collect proper samples**



A worker at the city's recycling center on Friday, Sept. 22. Credit: Kate Darby Rauch

Even on the driest of days, with strong sun and no hint of rain, conditions at Berkeley's transfer station can get pretty dirty. Understandably, as this is the city's landing spot for trash. Many know the familiar stench.

Add rain to the combo of garbage, recyclables, green waste, electronic waste, construction debris and more at the disposal hub, and things get mucky, especially the ground — the concrete, asphalt and dirt.

In California, this muck or stormwater must be managed to protect nearby waters from pollutants draining from the site. Transfer stations are required to follow an “industrial general permit,” issued and enforced by the state water board. The permit also covers some non-storm runoff waters, such as from hosing or cleaning. Permit compliance relies on following site-specific and updated industry best practices, which the city must outline in a thick master planning document called the Stormwater Pollution Prevention Plan.

In their inspections, the water board and River Watch found some similar violations at the transfer station. River Watch’s concerns were generally more extensive, based in part on a historical dive into a few years of transfer station’s mandatory stormwater sampling and reporting.

The inspections weren’t related. “There is no relationship between the Water Board’s inspection of the Transfer Station and CA River Watch. When the Water Board inspected the facility in January, we did not have knowledge of River Watch’s involvement,” said Eileen White, executive director of the regional water quality board.

Transfer station staff accompanied inspectors in both cases.

Drainage is the center stage of stormwater control, and drainage was central to the concerns of the state board and the nonprofit.

A complex system of drains serves the transfer site, located in different sections of the operation or catchment areas. Some connect with the city’s storm drain system, gutters and culverts that carry untreated runoff to the bay. Others connect with the city’s or the East Bay Municipal Utilities District’s sewage system, which feeds into treatment plants before being released into the bay.

Some drains at the transfer station are trenched; some screened or filtered to catch debris; some equipped with cleaning devices. Some stormwater is pumped into holding silos or tanks before being transferred to sewage pipes. Some trenches have adjustable gates, where water can be directed to the city’s sewage system (treated) or the run-off system (untreated).

According to the water board’s Jan. 3 inspection report, many areas of the transfer station looked clear, especially under roofed operations. But inspectors also found drains that were backed up and filled with trash and debris. Pooled water. Drains with fabric filters that appeared to block stormwater. Torn or worn berms used to block flood waters.

Water board inspectors also noted overflowing stacks of recycled materials, cardboard and plastic, with falling and blowing debris. And an oily sheen on the ground of the truck fueling area.

Potential flooding from Codornices Creek, which runs north of the site, was also mentioned.

Based on the industrial permit, the board categorized site violations under:

- Good housekeeping for stormwater discharge locations and drainage areas.
- Spill and leak prevention and response for the diesel fueling area.
- Material handling and waste management for containment of recyclable materials.

To fix the issues, it required the city to clean and maintain problematic trench drains; replace filtering fabric that appeared to block stormwater from entering drains; provide additional information on procedures used to secure recycled material piles, and consider adding additional steps to prevent falling debris; clean diesel spills and describe procedures to prevent future spills; and collect and share detailed information on the impacts of the winter's heavy rains, including from stormwater sampling and testing.

In its inspection findings, River Watch also questioned the placement of site drains and sampling spots. The nonprofit's violation summary included:

- Failure to collect and analyze the required number of storm water samples.
- Failure to provide sampling results for discharges resulting from transportation- related activities.
- Failure to sample from representative sampling locations.
- Failure to collect and analyze the required number of stormwater samples.
- Failure to implement proper erosion controls.

In addition, River Watch said the city should do more extensive testing in the truck area, specifically for TPHG and TPhd, hydrocarbons found in gasoline. "The current practice of testing for Oil & Grease does not include petroleum hydrocarbons even though the Discharger acknowledges petroleum products (oil, grease, gasoline, motor oil, and diesel) as potential sources of pollutants at the Facility," River Watch said in its letter to the city.

The nonprofit also said the transfer station should test for 6ppd quinone, a tire preservative recently discovered to be lethal for Coho Salmon.

River Watch cited the city for insufficient required water sampling and reporting, going back three years. Some levels of pollutants in stormwater are allowed under the permit, but the system is designed to minimize this through regular self-sampling, self-reporting and self-fixing. Sampling results drive improvement requirements.

"As of the date of this Notice, the Discharger has failed to upload onto the SMART'S online database the required number of stormwater run-off sample analysis for Annual Reporting Year 2021-2022 and Annual Reporting Year 2020-2021, and has not provided an adequate explanation for its failure to do so," said the River Watch 'intent to sue' letter.



The organization challenged the city's stance that during some drought years there wasn't enough stormwater to meet the 0.1 inch state threshold for required testing, pointing out that this precipitation level was met during the same years at nearby locations

The nonprofit said that previous years of site stormwater testing showed potentially harmful levels of several pollutants that could reach the bay, including copper, lead, zinc, iron, aluminum, COD (chemical oxygen demand) and TSS (total suspended solids).

Maintaining stormwater control best practices is critical to keeping bay waters clean, the organization said.

"River Watch contend[s] the Discharger will continue to be in violation of the [Clean Water Act] every day it discharges storm water containing pollutants" without "adequately implementing" best management practices, the organization said in its letter to the city.

Attorney Gutiérrez Morales elaborated: "As per the Settlement Agreement, the City has agreed to complete the Remedial Measures identified in the Agreement," he said. "Completing those remedial measures should reduce the [pollution] exceedances. We can only wait and see in the next three years to determine where the Facility is at. Until then, at least the Facility has steps to take to help them focus on what they need to do to get them into compliance."

### **City agrees to improve stormwater control at transfer station**

Facing fines from the water board and the threat of the lawsuit from River Watch, Berkeley is stepping up stormwater control at the transfer station.

In its response to the water board, sent in March, the city's actions included:

- Cleaning trenches and storm drains, clearing drainage obstructions, inspecting grates and sump pumps.
- Repairing a broken conveyer belt in the recycling area to help prevent pileups of material.
- Enhancing staff training on diesel spill response.
- Provided detailed January records of stormwater holding tanks, including noting a broken sump pump that may have led to site flooding.
- Updating the city's transfer station Stormwater Pollution Prevention Plan.

And in its settlement with River Watch, the city said it will:

- Improve its stormwater sampling and monitoring after rainy weather, including using log sheets and video, and install a personal digital weather station, to measure precipitation.
- Test for the petroleum hydrocarbons TPHG and TPhd for at least two rain events, and if none are detected this testing requirement ends.

- Use trench drain inspection and maintenance logs.
- Increase the cleaning of a sump pump grate, including hand-sweeping water before it enters the grates.
- Repaint rusted yellow construction debris containers, replace and remove containers with punctured floors.
- Cleanup of trash and “abandoned” metal.
- Also update the Stormwater Pollution Prevention Plan.

When asked if the city’s situation was unusual or surprising, Gutiérrez Morales from River Watch said not really.

“Sometimes it’s a matter of not knowing what the industrial groundwater permit requires,” he said, noting it’s a complex, detailed law. “There are so many costs, manpower.”

**10 comments**

