



City of
SANTA CLARITA

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May 12, 2015

California Regional Water Quality Control Board
Los Angeles Region
Attention: Mr. Man Voong
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Dear Mr. Voong:

Subject: Comment Letter – Total Maximum Daily Load (TMDL) for Trash in the Los Angeles River Watershed Revisions

The City of Santa Clarita (City) is committed to removing trash from its streets through litter prevention and the clean-up of our communities and waterways. Cleaning trash and dumped items is something the City supports through river and community clean-up events, aggressive street sweeping, and quick response to illegal dumping.

Within City limits is a small area, 0.09 square miles or 0.233 square kilometers, of the Los Angeles River watershed and there is one rural highway through the watershed area. The area was documented by the California Regional Water Quality Control Board as not including storm drains. It was also included in the Notice of Intent for the Enhanced Watershed Management Plan with a continued commitment to street sweeping and anti-dumping enforcement activities. The City owns a 19-acre parcel of mountainous, natural open space that does not have public access. There is no trail, parking lot, out buildings, or any other amenity that would allow recreational access to the property. Using the calculations in the draft amendment, if this was an active open space area, it would be issued a generation rate in the load allocation of 19 gallons per year. The open space area owned by the City has a low level of trash generated, in a conservative estimate from active open space, and does not appear impaired for trash. Please see the enclosed map and photos of the area to document this information.

In reviewing Figure 2-8 of the Regional Board Basin Plan, there is not a tributary that is a water of the United States within City limits that is tributary to the Los Angeles River. The draft amendment states, "...For nonpoint sources, zero trash is defined as no trash in the waters or parks, open space, or recreational facilities adjacent to the Los Angeles River, including its estuary, and its tributaries..." The City does not have any adjacency to a tributary and cannot be issued a load allocation from the City open space. Figure 2-8 has been enclosed for your reference.



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The City formally requests to remove the City of Santa Clarita Load Allocation portion of the TMDL, in addition to maintaining the deletion of the Waste Load Allocation. The area is not impaired, and there is not a tributary that is a water of the United States. If there is some information not currently available that demonstrates this is regulated water, there is no impairment in the area for trash. If in the future, there is a storm drain installed in the area, the City has committed through the NPDES permit compliance process to install full capture trash devices. The recently adopted trash policy would also affect the area if the City area is removed from the TMDL, so there would not be any regulatory gap.

Compliance with this load allocation would require clean-up ten or more times each year, in addition to the existing anti-dumping enforcement, clean-up activities, and the weekly street sweeping of Sierra Highway. These additional regulations would divert needed resources for trash abatement from other parts of the City addressing other, higher water quality priorities. This will also require substantial administrative effort to be coordinated and included in a separate report with required documentation and annual reporting. There would also have to be a separate permitting mechanism with fees and attorney review. These expenses and efforts are unreasonable for an area that simply does not generate trash to the level of focused compliance that a TMDL requires. There are also mechanisms in place to prevent future trash should the land uses change.

Setting a compliance deadline for load allocation by September 2016 is inappropriate. Since the load allocation to specific properties is a new rule, the load allocations should be more consistent with the timelines in the SWRCB trash policy, allowing up to ten years for compliance with zero trash. New training must be instituted for tracking, budgets established for the additional tracking time, and policies and procedures developed and implemented. The suggestion that this is a minor change to the trash TMDL compliance is inaccurate and sufficient compliance time will be required. Similar regulation of agriculture using the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region program allowed for substantial implementation time for coordination among agencies and groups. The City requests a ten year process for an additional regulation of a previously unregulated activity and requests consistency with the recently approved statewide trash policy.

In addition, we request the removal of the generation rate from the load allocation process. We further request a compliance option that allows for trash clean-up and visual documentation. This would expedite the timeline for clean-up. However, if there needs to be a daily trash generation factor in the load allocation for open space, it needs to accurately reflect what the use is at the location. This daily trash generation rate should be zero for open space without accessibility. There should be a discernable difference for trash generation from active open space, such as popular parks, and open space such as remote hiking trails.

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The City also feels that receiving water monitoring is unnecessary and is a significant compliance burden. However, if receiving water monitoring is retained, the City requests the Regional Board staff remove the requirements to follow SWAMP protocol, provide information on MS4 infrastructure and high trash areas, and monitoring the exit and entrance to the water body. Trash locations and volumes are highly variable and can constantly change. Providing the resources to capture this extensive monitoring data will not be an effective use of resources to stop littering and trash from entering waterways

Please contact me by e-mail at hmerenda@santa-clarita.com or by phone at (661) 286-4098, if you have any questions or concerns regarding the comments from the City. Thank you in advance for your time and consideration.

Sincerely,



Heather Merenda
Environmental Services Program Coordinator


HM:ll

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Enclosures

cc: Robert Newman, Director of Public Works
Travis Lange, Environmental Services Manager



 This map is a user-generated static output from City of Santa Clarita GIS Online mapping website and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. The City of Santa Clarita does not warrant the accuracy of the data and assumes no liability for any errors or omissions.

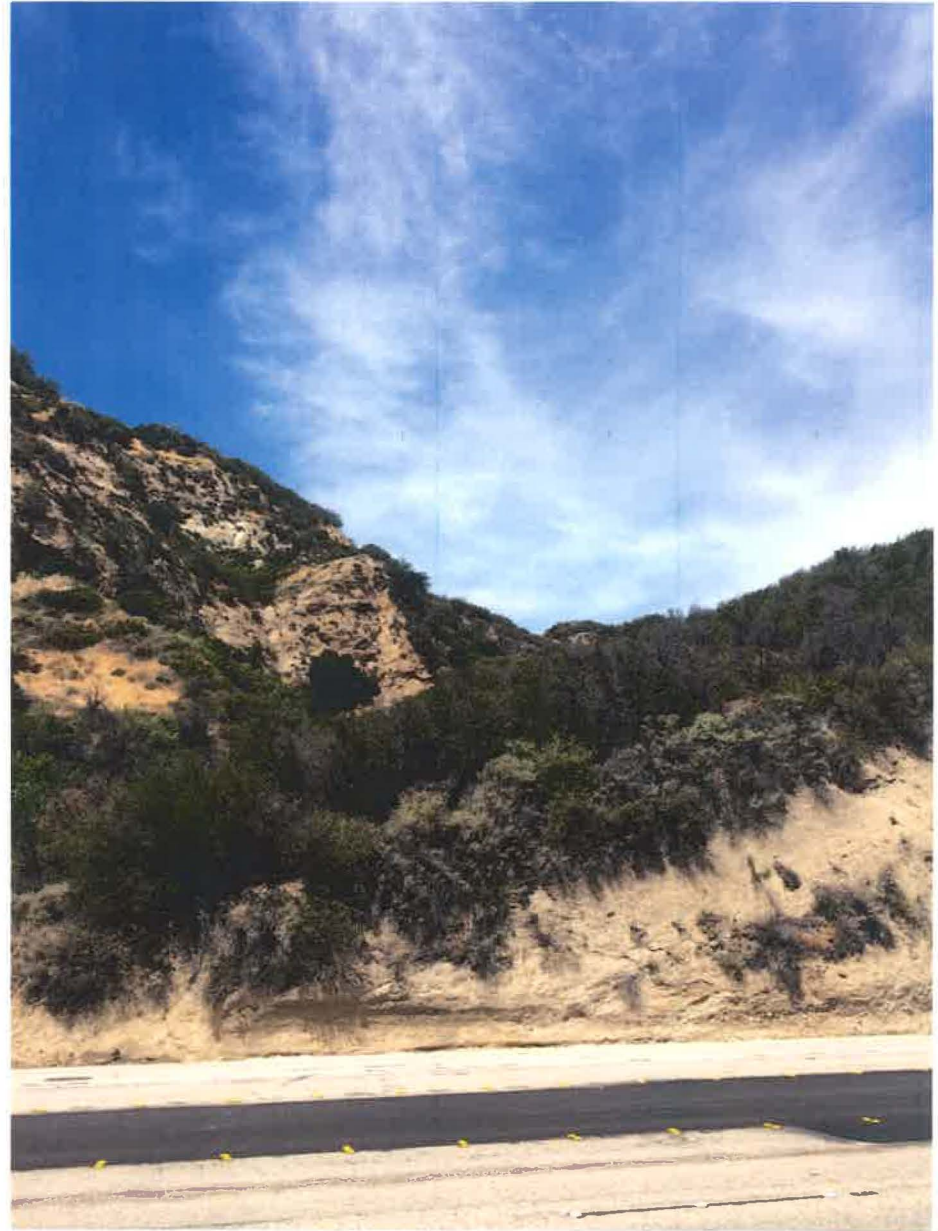
Approaching City Limits on Sierra Highway



Sierra
Highway
within City
Limits



**City Open
Space
From Sierra
Highway**



Private Land
on the
Other Side of
Sierra
Highway
Opposite
City Open
Space



Private Land
on the
Other Side of
Sierra
Highway
Opposite City
Open Space



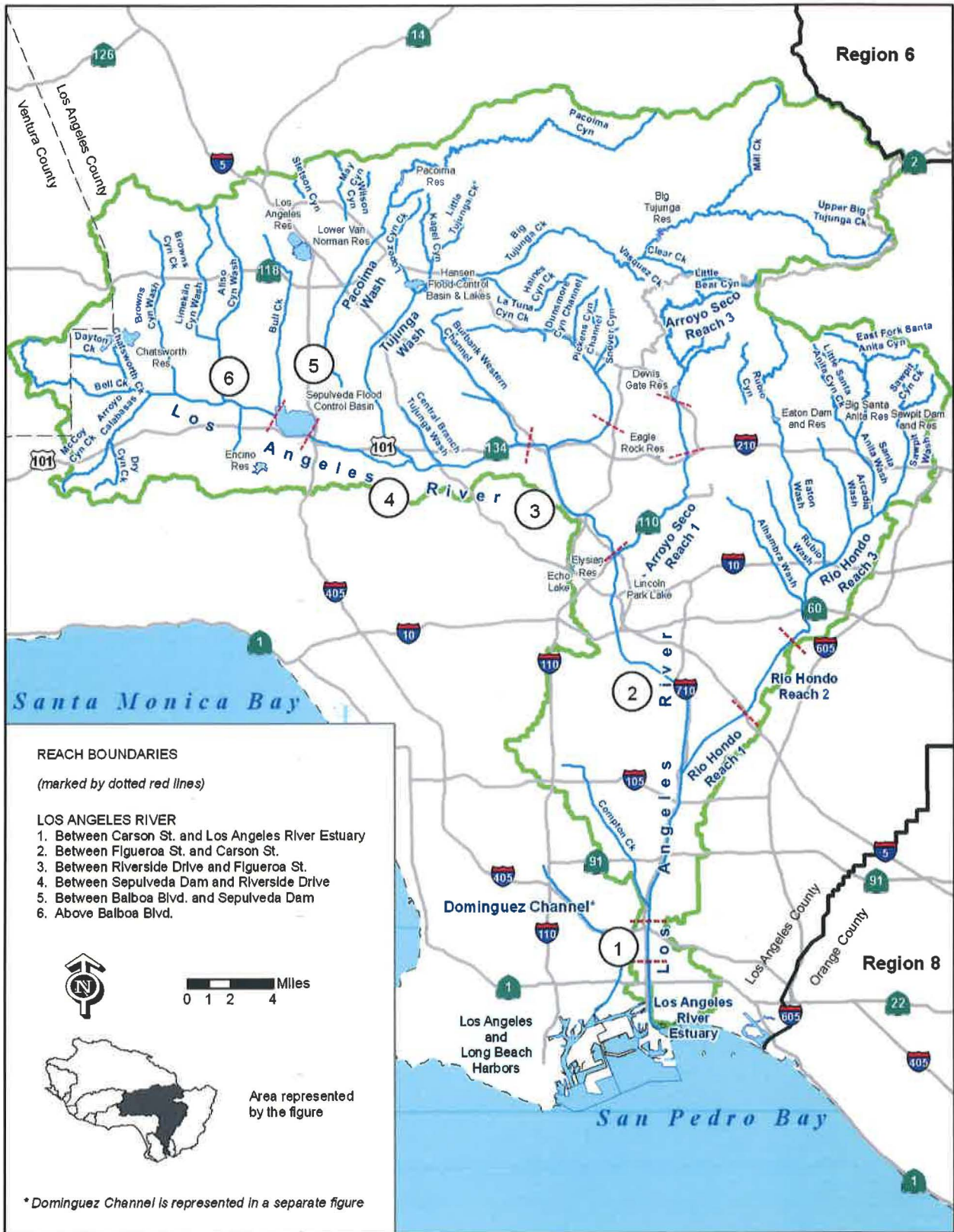


Figure 2-8. Major surface waters of the Los Angeles River watershed.