

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Dear Ms. Townsend:

Subject: Comment Letter – Trash Amendments

The City of Santa Clarita (City) appreciates the efforts the State Water Resources Control Board (State Board) has made in developing a Statewide Water Quality Control Plan to Control Trash (Trash Amendments). The City believes consistency with trash regulations across the state is the best approach to address this issue. Within the text of the draft policy, it is noted that the state will enforce the policy through the Municipal Separate Storm Sewer System (MS4) Permit program.

While MS4 Permittees throughout the state have existing requirements for trash reduction, such as street sweeping and educational programs, trash continues to be a pervasive issue in our waterways. The proposed Trash Amendments focus primarily on urban land uses that are actually developed (i.e. not just zoned) as areas that generate trash. Two tracks are being offered to address trash in these areas, one with full capture devices and one with a suite of best management practices with effectively equivalent trash removal capability. However, there is no calculation or reporting standards listed in the proposed Trash Amendments. It is expected that reporting will be addressed in later versions. At this point, the city offers the following suggestions to be considered:

1. Costs – Economic impacts should be considered, whether it be for full capture devices or additional programs. MS4 Permittees are struggling to maintain the current requirements. Requiring additional infrastructure or programs will further strain fiscal resources. Proposition 218 remains a major issue to consider when asking our citizens to fund these additional requirements.
2. Timeframe – While 10 to 15 years may seem like a long time, it is relatively short when taking into account the research, planning, bidding, funding, construction, and compliance with other regulations MS4 Permittees must consider. At a minimum, a 20 year timeframe should be considered.
3. Multi-benefit projects – Instead of piecemeal treatment devices and programs for trash are the purpose of the Trash Amendments, projects that offer multiple benefits should be given priority. It is understood that trash is a visible nuisance, but projects that treat for multiple pollutants or act to replenish local groundwater should be considered more beneficial and a better use of resources. An efficient use of resources should be viewed as far more favorable by the regulators as well as our local and state citizens.
4. Clarify land-use areas - Storm drain drainage areas are not specific to land-use areas. The regulated drainage areas should be defined as having more than 75% of the specified land-use in order to address the area.

5. Amalgamate land-use areas – It should be acknowledged that land-use areas are dispersed throughout communities and are not necessarily in defined quadrants. Municipal activities such as street sweeping routes are based on clustered areas and are not based on land-use zones. Measurements or reporting for specified land-use would be impossible or exceptionally difficult. Land-use areas should be amalgamated or defined as 75% or more.
6. Right-of-way or publically owned land - There is a perception that new regulations will affect properties that are privately owned and are already developed. With a specified timeframe to install treatment devices, requiring private properties to install treatment devices creates an eminent domain issue that creates a wide-variety of issues. It should be specified that treatment devices shall be required only on land that is within the public right-of-way or publically owned.

was included in the Los Angeles River Nitrogen Compounds and Related Effects TMDL due to an extremely small area, 0.09 square miles (or 0.233 square kilometers) of the Los Angeles River watershed that is located within City limits. This area is rural, undeveloped open space. There are no storm drains, gutters, catch basins, or Municipal Separate Storm Sewer Systems (MS4s) in this location. The only paved road, Sierra Highway, is swept on a weekly basis and the City monitors the area regularly for any illegal dumping activity.

Documentation in the form of a map of this area has been included with this letter.

Due to the fact that there are no MS4s in this area, there is no compliance point to which the City is able to measure conformity with this TMDL. Please consider removing the City of Santa Clarita from the list of affected Permittees for this TMDL.

If you have any questions or need additional information, please contact me at [661-286-4098](tel:661-286-4098).

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