



Public Works Department

August 4, 2014

File # 0780-85-KY181

Via Email Submission to:

commentletters@waterboards.ca.gov

State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Attention: Jeanine Townsend, Clerk to the Board



SUBJECT: COMMENT LETTER – TRASH AMENDMENTS

The City of Chula Vista appreciates the opportunity to provide comments on the State Water Resources Control Board (SWRCB) Draft Amendments to Statewide Water Quality Control Plans to Control Trash (Proposed Trash Amendments), dated June 2014. While the City of Chula Vista supports State Water Board's efforts to control trash throughout California, we have specific comments on the Proposed Trash Amendment that we believe will improve the overall effectiveness of the program. Our comments are provided in the attachment to this letter.

Also, we would like to express our general support of the comments provided by the California Stormwater Quality Association and the County of San Diego on the same subject.

Thank you for your consideration of our comments. If you have any questions, please contact me at (619) 397-6111 or kaminpour@chulavistaca.gov. Thank you again for the opportunity to comment.



KHOSRO AMINPOUR
SENIOR CIVIL ENGINEER

C: William S. Valle, Assistant Director of Engineering
Silvester Evetovich, Principal Civil Engineer
Marisa Soriano, Environmental Health Specialist

H:\NPDES\RWQCB-SWRCB Correspondence\Trash Amendments Comment Letter August 2014.docx

ATTACHMENT 1 – Comments on Trash Policy

- 1) The Trash Amendment prioritizes areas solely based on land use designations. This approach assumes that all areas within one land use category generate the same amount of trash. Local knowledge and experience shows that this is not the case, and other factors should be taken into consideration. Data available from street sweeping, storm drain cleaning, and other information should be used to prioritize high-trash volume areas in each jurisdiction. Identifying actual priority areas will result in higher efficiency and effectiveness and will achieve the goals at the shortest possible time.

The City of Chula Vista recommends that flexibility be provided for jurisdictions to use available data to prioritize high-trash volume areas of their jurisdiction.

- 2) High-density residential areas are categorized as priority land uses. This category includes apartment and condominium complexes. While more people per acre live in these types of residential communities than single family homes, there is generally much more strict oversight on the maintenance and management of common areas and private streets by homeowner associations and management companies. Residents are required to comply with strict community regulations and pay for the community's maintenance costs. Therefore, they are more sensitive about keeping the community clean in order to avoid higher homeowner association fees.

The City of Chula Vista recommends that the High Density Residential category be deleted from the list of Priority Land Uses.

- 3) Clarification is needed to enable jurisdictions to evaluate the equivalency of other treatment controls, institutional controls, and multi-benefit projects; and ensure that they will meet compliance if they choose the Track 2 option. Uncertainty about this issue will expose jurisdictions to enforcement and/or legal action.

The City of Chula Vista recommends adding language to clarify how jurisdictions are to evaluate equivalency with Track 1 if they decide to choose Track 2.

- 4) Monitoring is expensive and should not constitute a significant portion of the program total costs. While monitoring is necessary to assess the effectiveness of the program, it does not by itself result in cleaner water. A cost-effective monitoring protocol should be developed based on simple visual observations, which allows more of the limited resources to be spent on actual treatment control measures.

The City of Chula Vista recommends allowing other methods of assessment in addition to a cost-effective monitoring program to determine compliance.

- 5) Implementation of the Trash Amendment will impose significant costs on jurisdictions. The State Water Board can include provisions in the Trash Amendment to allow Regional Water Boards to provide credit to jurisdictions to offset some of their obligations toward MS4 Permit requirements and compensate for the additional costs.

The City of Chula Vista recommends the addition of language to allow Regional Water Boards to provide credit to jurisdictions to offset some of their MS4 permit requirements and compensate for additional costs.