



# City of South Lake Tahoe

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Public Comment  
Trash Amendments  
Deadline: 8/5/14 by 12:00 noon



August 4, 2014

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup>  
Sacramento, CA 95814

## RE: City of South Lake Tahoe Comment Letter – Statewide Trash Amendments

Dear Ms. Jeanine Townsend:

The City of South Lake Tahoe (City) appreciates the opportunity to provide comments on the Proposed Amendments to Statewide Water Quality Control Plans to Control Trash (proposed Trash Amendments) and the Draft Staff Report, including the Draft Substitute Environmental Documentation (SED). The City of South Lake Tahoe is subject to the requirements of a Phase I Municipal Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) Permit (Board Order No R6T-2011-0101A1, NPDES NO. CAG616001) including pollutant load reductions required under the Lake Tahoe Total Maximum Daily Load (TMDL).

The proposed Trash Amendments would require NPDES Storm Water Permits (including MS4 Permits) to incorporate either of the two following tracks:

**Track 1** – Installation, operation and maintenance of full capture systems (5 mm and greater particle size) in storm drains from priority land uses (high density residential, industrial, commercial, mixed urban, and public transportation stations).<sup>1</sup>

**Track 2** – Implement a plan with a combination of full capture systems, other treatment controls, and institutional controls determined to be as effective as Track 1 verified by annual monitoring to address whether the amount of trash discharged from the MS4 has decreased from the previous year.<sup>2</sup>

The City of South Lake Tahoe is located entirely within the Lake Tahoe basin, and at an elevation of 6,237, feet experiences a high-alpine climate with significant snowfall during the winter. The year-round resident population within the Lake Tahoe basin is approximately 66,000 and about three million people visit Lake Tahoe each year.<sup>3</sup>

<sup>1</sup> Draft Staff Report for Proposed Trash Amendments, June 2014, Page 11.

<sup>2</sup> Draft Staff Report for Proposed Trash Amendments, June 2014, Page 16.

<sup>3</sup> Tahoe Facts, prepared in cooperation with the UC Davis, Tahoe Environmental Research Center:  
[http://tahoefacts.com/html/body\\_tahoe\\_faqs.html](http://tahoefacts.com/html/body_tahoe_faqs.html)

The City is a responsible party for implementation of the Lake Tahoe TMDL, which was promulgated to address lake clarity impairments from known pollutants such as fine sediment particles, Nitrogen, and Phosphorus. None of the waterbodies within the Lake Tahoe basin (including Lake Tahoe) are identified as trash impaired on the 303(d)/305(b) list of water body impairments adopted by the State Water Resources Control Board. The Implementation Actions included in the Lake Tahoe TMDL for urban areas include enhanced street sweeping in order to reduce fine sediment particle loads in areas where winter road traction abrasives are applied.<sup>4</sup> Lake Tahoe basin specific street sweeping studies have found that materials commonly collected on streets within the basin include “pine needles, pine cones, street sediment and the rare item of trash”.<sup>5</sup> The City also maintains records of materials removed from the storm drain system, which primarily consist of sediment, pine needles and pine cones. Given the site specific conditions within the City, and documented lack of trash in the drain inlets (as documented by Lake Tahoe TMDL studies), Track 1 is not a viable option for the City since the MS4 is not the primary source of trash conveyed to local waterways and Lake Tahoe.

Given that approximately three million visitors come to Lake Tahoe each year, an unfortunate impact is that direct dumping or littering at lakeside beaches is by far the most common source of trash at Lake Tahoe and local waterways. In partnership with the Lake Tahoe Visitors Authority, U.S. Forest Service, Tahoe Regional Planning Agency, Douglas County (Nevada), South Tahoe Refuse and Recycling Services, and the League to Save Lake Tahoe, the City has initiated the “Adopt a Beach Tahoe” program to focus trash reduction efforts on beach cleanup after large holiday events.<sup>6</sup> The City has pro-actively sought to ban the use of single use plastic bags. Given that street sweeping in the Tahoe basin collects far more pine needles, sediment and pine cones than trash, storm drains are not significant conveyances of trash to surface water; non-point direct littering is the primary source of trash. Under the current Track 2 language, and as discussed in Issue 10 in the Staff Report<sup>7</sup>, the City would be required to “collect monitoring data about existing trash levels prior to implementation of institutional controls.” The minimum monitoring requirements listed on page 82 would force the City to allocate resources to quantify the amount of trash discharged from the MS4, and quantify the decrease from the baseline, and determine the according reduction or justify the lack of a numeric decrease. The City is concerned that the existing text in Track 2 requires extensive outfall monitoring and trash counting to determine load reductions, although site specific TMDL studies, data and volunteer collection efforts find that the primary source of trash is littering at Lake Tahoe beaches, not conveyance and delivery via the storm drain system. The City requests that Track 2 language include more flexible methods for monitoring and reporting, based on site specific information, not extrapolated methods from studies conducted in urban, heavily populated areas of the state.

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<sup>4</sup> Final Lake Tahoe Total Maximum Daily Load Report, November, 2010, Section 11.3.1, page 11-7.

<sup>5</sup> Effectiveness of Street Sweeping in Incline Village, NV, Nevada Tahoe Conservation District, December 2011, page 9. Available online at: [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5355434.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5355434.pdf)

<sup>6</sup> Adopt a Beach Tahoe website: <http://www.adoptabeachtahoe.com/adopt-a-beach/>

<sup>7</sup> Draft Staff Report for Proposed Trash Amendments, June 2014, Pages 80-82.

On page 12 of the Draft Staff Report for the proposed Trash Amendments, it is noted that the two compliance Tracks for MS4 Phase I and Phase II NPDES permittees are based on the results of studies conducted in the City of Los Angeles (2002), County of Los Angeles Department of Public Works (2004a; 2004b), City and County of San Francisco (2007), City of Cupertino (2012), City of San Jose (2012) and EOA Inc. (2012a). All of these studies were conducted in vast, urban centers with populations of over 1 million people. The City of South Lake Tahoe is a forested community with a population of only 21,286. The City is concerned that the studies used to develop this statewide mandate focused on the sources of trash and methods for monitoring and reporting that were developed in large urban centers, which may not be applicable to many of the less developed, rural portions of the state.

Page A-12 (Appendix A: Trash Background), of the proposed Trash Amendments are based on trash and debris characterization studies conducted in San Diego, Orange, Los Angeles and San Francisco County regions which found an abundance of plastics and trash conveyed by MS4 systems. The report notes that these are the most densely populated coastal watersheds in California. Again, the City is concerned that the proposed Statewide Amendments are based primarily on studies conducted in highly urbanized population centers, and will force smaller, less urbanized communities to include costly and time consuming monitoring efforts based on studies and methodologies developed for major urban areas within California. The City requests the Track 2 language include changes to allow flexibility to avoid counting and reporting trash quantities at outfalls, and focus efforts on more effective clean ups that target the primary source of trash at Lake Tahoe: littering at the beach.<sup>8,9,10</sup>

The community and economy of the City depend on the protection of the stunning natural beauty of Lake Tahoe. The City appreciates the objective for the proposed Trash Amendments to focus limited resources on effectively reducing environmental issues associated with trash in state waters, but is concerned that the proposed statewide regulatory approach based on studies focused on sources and monitoring methods for major metropolitan centers would create burdensome and inappropriate requirements to the forested, high-alpine environment in the Lake Tahoe Basin.

The City of South Lake Tahoe is dedicated to implementing cost-effective measures to address known water quality impairments in order to protect and improve the pristine clarity of Lake Tahoe, as required by the Lake Tahoe TMDL and applicable MS4 Permit. The City is also dedicated to effective measures to reduce trash in local waterways and Lake Tahoe that do not create ineffective, costly and burdensome data

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<sup>8</sup> “Volunteers remove 2,260 pounds of trash from Tahoe beaches”, League to Save Lake Tahoe, July 7, 2014.

Available Online: <http://keeptahoeblue.org/news/press-releases/?id=722>

<sup>9</sup> “The Trashing of Tahoe”, Moonshine Ink, July 30, 2014. Available Online:

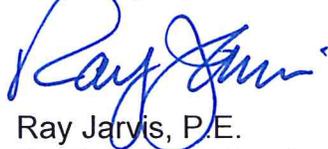
<http://www.moonshineink.com/news/trashing-tahoe>

<sup>10</sup> “Tahoe trashed: Beach crowds take memories, leave garbage”, Reno Gazette-Journal, July 9, 2014. Available Online:

<http://www.rgj.com/story/life/outdoors/2014/07/09/tahoe-trashed-beach-crowds-take-memories-leave-garbage/12377249/>

collection and additional annual reporting requirements. Please feel free to contact the city's Stormwater Program Coordinator Jason Burke with any further questions at 530-542-6038, or by email at [jburke@cityofslt.us](mailto:jburke@cityofslt.us).

Sincerely,



Ray Jarvis, P.E.  
Public Works Director  
City of South Lake Tahoe

cc: Jason Burke, Stormwater Program Coordinator (City of South Lake Tahoe)  
Robert Larsen, Senior Environmental Scientist, Lahontan Regional Water Quality Control Board