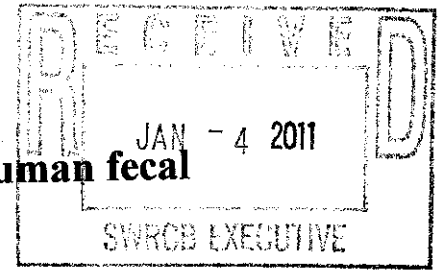


**City of Santa Cruz comments on
Draft Resolution No. -2011-
adding the San Lorenzo River watershed to the human fecal
material discharge prohibition**



The City of Santa Cruz supports the approval of an amendment to the Basin Plan to: 1) Remove Shellfish Harvesting Beneficial Use for the San Lorenzo River Estuary; 2) Add the San Lorenzo River Watershed to the Human Fecal Material Discharge Prohibition and the Domestic Animal Waste Discharge Prohibition; and 3) Adopt Total Maximum Daily Loads for Pathogens in the San Lorenzo River Estuary, San Lorenzo River, Branciforte Creek, Camp Evers Creek, Carbonera Creek, and Lompico Creek. We appreciate the opportunity to comment on the draft resolution.

The draft resolution requires that "owners of land that include homeless persons/ encampments" prevent any load of fecal coliform bacteria from human sources and that the owner demonstrates that no such discharge is occurring. This is a noble endeavor that will necessitate an effort that goes beyond the City's control.

Regardless the City looks forward to the challenge.

The cost estimates in the resolution do not reflect the actual cost or difficulty to achieve the desired results. Homeless persons/encampments will not go away by putting up fences and increasing police patrols.

The City of Santa Cruz has been active in addressing the citywide issue of illegal homeless encampments, approaching the problem with a goal of improving the associated social, public safety and environmental problems in the City's parks, open space areas and river ways. This work is accomplished by frequent river and greenbelt clean-ups, enforcement by police and the City's park ranger, and through annual funding of social service programs that directly serve the City's homeless population. These programs provide day and night shelter; counseling services, job training; transitional housing; child care; and hygiene centers, which offer showers, and restroom and laundry facilities. This proactive approach has proven successful in the past and is representative of the City's preferred handling of homelessness: to help individuals lift themselves out of homelessness permanently.

While the City agrees that illegal homeless encampments need to be addressed, the methods of security guards, portable toilets and fencing implied by the cost estimate may not be effective or feasible. For instance, although Santa Barbara may have met with success in providing portable toilet facilities along creeks and areas occupied by homeless people, we believe this action is counter to our goal of eliminating homelessness altogether. The City does not want to encourage or facilitate camping and, as local social service programs more than provide for hygiene needs of our homeless community, we feel there already exists opportunities for proper hygiene.

The City will continue to improve on our programs to reduce homelessness and their impacts to the waterways. Yet it must be acknowledged that the problem can not be solved by the City alone. This is a State and National policies and economics issue and the City is merely at the downstream end of the problem. As with storm water pollution prevention the solution is not in final treat treatment but in education and source control.