



PUBLIC WORKS DEPARTMENT

August 4, 2014

VIA EMAIL TO: commentletters@waterboards.ca.gov

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



Subject: Comments - Amendments to Statewide Water Quality Control Plans to Control Trash (Proposed Trash Amendments)

Ms. Townsend,

Upon review of the Proposed Trash Amendments, the City of La Mesa has the following comments.

1. Focus of trash-control in high trash-generating land uses and implementation flexibility

City of La Mesa supports the focus on high trash generating land uses. Focus on these areas within a community will allow stormwater programs to invest resources where they will provide the best return on the investment in the controls. Rather than installing devices in areas where the return on the investment will be low, we recommend that the Trash Amendments allow for flexibility by establishing a process through which permittees could petition their Regional Water Board to review the areas in question and give the public agency the authority to exempt such areas if they are found not to be high trash generating.

2. Recognition of current watershed management and pollutant prioritization programs

Many MS4s around the state have been working extensively with the Regional Water Boards to develop and implement programs based on watershed planning and the prioritization of water quality conditions. The Proposed Trash Amendments need to recognize the value of current management programs and not divert resources away from ongoing successful efforts to control trash in our waterways or place additional demand on already limited resources. We urge the State Water Board to allow MS4 programs with existing focused water quality implementation plans to address trash in the prioritization context of those existing plans.

3. Funding for compliance with the Trash Amendments

City of La Mesa does not dispute the water quality benefits of controlling trash, however, the amendments represent added costs, and may take away from other planned water quality efforts. Not only are we concerned with the initial cost of installing these full capture devices but also the ongoing costs of managing and maintaining them. The City of La Mesa recommends that the State Water Board Partner with permittees to explore possible ways to fund these trash control measures.

Thank you,

Brian Philbin
City of La Mesa