

August 5, 2014

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov



RE: Comment Letter- Trash Amendment

Dear Ms. Townsend,

The City of Santa Rosa appreciates the opportunity to comment on the Draft Amendments to Statewide Water Quality Control Plans to Control Trash.

Trash is an important issue that the effects our waterways, wildlife, water quality, and our community. Santa Rosa, which has over 100 miles of creeks within the city, has a very proactive Creek Stewardship program and engaged network of Creek Stewards. Through the efforts of volunteer cleanups and work done by City Staff and its contractors, over 800 cubic yards of trash are removed from our creeks every year.

While the City generally supports the State Boards efforts with the proposed Amendments, the policy is focused on achieving 100% trash capture from the storm drain system (Page 11, Table 1) while the overall objective is focused on prohibiting trash accumulation in the waterway, "No trash shall accumulate in state waters (or in areas adjacent to state water) in amounts that would either adversely affect beneficial uses, or cause nuisance" (Page 11, 2.2). These two items appear to be inconsistent.

- It is the City's experience that a significant percentage of the trash in our waterways is from homeless encampments, and is not in fact conveyed through the storm drain system. As written, the City could go through the resource intensive process of achieving full capture from the storm drain system and still not achieve the water quality objective.

It is requested that the language of the objective be revised to specify that it no accumulation occurs as a result of discharge of trash from the storm drain system. Alternatively it is requested that the language in the proposed compliance tracks be revised to include the requirement to address trash that reaches the waterways through routes other than the storm drain system.

- In order to achieve full trash capture, the City would need at to invest an estimated minimum of \$1.2 million into storm drain improvements plus an additional \$1.2 million per year for maintenance. These dollar figures are substantial as the City has very limited funds and is limited in its ability to collect fees to fund this program by Proposition 218.

It is requested that the State Board support the ability of Permittees to secure funding sources for storm water quality programs, such as this trash policy.

- In order to adequately address the systemic trash issue, high trash generating industries and sources need to be targeted in addition to implementing trash capture.

It is requested that the State Board partner with State and Federal programs, such as CalRecycle (formally the Integrated Waste Management Board), to support policies, laws, and practices to reduce packaging and trash generation at the source.

The City of Santa Rosa would like to thank State Board staff for the opportunity to provide comment on this draft order. If you have any questions or need any further information, please contact Heaven Moore at (707) 543-4530.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Guhin", with a long horizontal flourish extending to the right.

David Guhin
Utilities Director