Supervisor Frentzen Supervisor Updates
Bas 3/24/15

March 11, 2015

Dear Supervisor Frenzen et al

I am happy to report that Sand Ridge Road is now so smooth I almost do not want to drive on it.

What a change from the gullies, the washboard and the rock bumps. I am pleased to send this letter to you all expressing my relief and my delight at the excellent job the crew has done. I have stopped and personally thanked the employees for the fine job they are doing.

I have placed a request on the Sand Ridge Facebook site asking people to slow down to save the road.

I have also suggested to the crew that signs be placed that ask people to SLOW DOWN or that there be speed limit signs...or suggested speed limits.

Please share my compliments with the road crew personnel and know that I thank you. My friends say they are now willing to come to visit again when they learn the road has been repaired.

So, just a message from a happy person who wrote you before when I was truly not a happy person.

My thank you to all. Please share this with other Supervisors and especially with the road crew!

Gretchen Fretter 2615 Sand Ridge Rd Placerville, CA 95667

## Dirt section of Sandridge Road

On March  $2^{nd}$  the CDA's Transportation Division Maintenance Crew began grading the dirt section of Sandridge Road reestablishing drainage ditches and grading the roadway. A 2% - 4% slope was graded in to the road to improve water run off where ever possible. No new drainage culverts were installed because of the fact that we cannot dump storm water on to private property without first having easements in place. Recycled asphalt grindings were added and compacted as the road was graded which we have done in the past. On Monday March 9- 11 we implemented a new approach never attempted before in El Dorado County by placing over 1000 tons of recycled asphalt grindings with our paving machine and grader, about 7 tenths of a mile was completed. This new method allowed us to place a consistent 3'' - 4'' of material on the roadway while allowing us induce better slope in to the road to improve water runoff. We will continue to monitor this project throughout the next year to determine how successful it has been. If deemed a success we will return next year to expand on this year's project. In my opinion this project was the gold standard in maintaining rural county dirt roads.

County of El Dorado County of Lassen County of Sacramento County of San Diego County of Solano City of Chula Vista City of Del Mar City of Elk Grove City of Escondido City of Folsom City of Galt City of Lemon Grove City of Poway City of Rancho Cordova City of Roseville City of Sacramento City of San Marcos City of Santee City of Vista City of Yuba California State Association of Counties Rural County Representatives of CA San Diego County Regional Airport Authority

S. Jedets Department updats
BOS 3/24115

March 23, 2015

Chairwoman Felicia Marcus State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100

Re: PROPOSED STATEWIDE TRASH AMENDMENTS

Dear Chairwoman Marcus:

This letter describes the concerns of several local government agencies and organizations that would be directly impacted by the Proposed Amendments to the Water Quality Control Plan for Surface Waters, Enclosed Bays and Estuaries of California and the Water Quality Control Plan for Ocean Waters of California related to the control of trash (Trash Amendments) under consideration by your Board. We share your Board's goal of clean water, and we recognize the important role that well-designed trash control programs can play in ensuring clean water for our communities. However, we have serious concerns about the process by which this proposed rule has been developed, as well as the effectiveness and cost of its implementation as currently drafted.

Your Board is scheduled to consider adoption of the Trash Amendments at a hearing on April 7, 2015. We find it troubling that less than one month from that hearing date, responses to over 70 written comment letters (over 600 comments) that were submitted by the August 5, 2014 deadline, have not been released to the public. The proposed Trash Amendments constitute rulemaking of statewide significance and we have not been provided with adequate opportunity to review the reasons why our comments and suggestions from over seven months ago were rejected. What's more, your Board proposes limiting oral testimony on April 7<sup>th</sup> to only those revisions proposed as part of a December 31<sup>st</sup> modified draft. This means we will be unable to raise many of our most significant concerns directly to you and the other Board members prior to your decision on this important matter.

Chairwoman Marcus State Water Resources Control Board Proposed Statewide Trash Amendments March 23, 2015 Page 2

From a technical standpoint, we are concerned that the proposed Trash Amendments are not well-focused, but represent a one-size-fits-all approach that could unnecessarily waste taxpayer dollars. Not all water bodies are designated by the state as impaired by trash, yet the proposed Amendments would mandate the installation and perpetual maintenance of "full-capture" trash devices, or equivalent methods, within all targeted land uses (commercial, industrial, high density residential, etc.). This approach appears to be based on trash data obtained from Los Angeles and other highly urbanized regions. However, the trash generation potential of commercial and industrial areas is likely to be very different in rural areas and less urbanized communities, where there may be significantly less density and population. It would make sense to amend the rule to provide more flexibility based on local conditions, focusing on areas where trash is a documented problem, and better integrating trash control with other water quality priorities that have been identified through existing and ongoing planning efforts.

The cost of compliance is also a concern. According to the your staff's economic analysis, costs to comply with the proposed Trash Amendments are estimated to be \$4 to \$10.67 per person per year on top of existing expenditures on trash reduction. As an example, this equates to between \$12 million and \$33 million of additional spending per year for permittees in San Diego County alone. Other regions would face similar costs and no resources would be provided to support compliance with the new requirements. Costs of this magnitude are problematic because they are additive to other mandates recently handed down by local Regional Boards (such as Total Maximum Daily Loads) and they are not easily borne by local government budgets, which are strained by many factors, including the increased costs of implementing more stringent stormwater permit requirements.

We respectfully request that your Board delay adoption of the Trash Amendments and consult with regulated parties to develop a more strategic and cost-effective approach that focuses regulatory requirements on areas with documented trash problems. We are available to assist in this effort.

Sincerely,

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RICHARD E. CROMPTON Director Public Works County of San Diego

Steve Pedretti Director Community Development Agency County of El Dorado

Sten M. Padath.

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Thomas Valentino, P.E. Manager Lassen Regional Solid Waste Management AuthorityCounty of Lassen

Chairwoman Marcus State Water Resources Control Board Proposed Statewide Trash Amendments March 23, 2015 Page 3



MICHAEL L. PETERSON Director Sacramento County Department of Water Resources



Bill Emlen **Director of Resource** Management County of Solano



Williams Velle WILLIAM S. VALLE
ASSISTANT DIRECTOR OF ENGINEERING



City of Del Mar

Al Corti, Mayor

Richard W. Shepard, P.E. **Public Works Director** City of Elk Grove





FOLSOM

Dair & Mile David E. Miller, AICP

**Director of Public Works** 



Steven Winkler Public Works Director, City of Galt Public Works Department



Graham Mitchell City Manager City of Lemon Grove





ROSEYILLE

Director of Development Services City of Poway

and Community

Development City of Folsom

> Cyrus Abhar **Public Works Director** City of Rancho Cordova

Mayor Carol Garcia City of Roseville



John Shirey City Manager City of Sacramento



Mike Edwards **Director Public Works** City Engineer City of San Marcos

Melanie Kush Acting Director of Development Services

City of Santee

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JuayRitter

Judy Ritter, Mayor City of Vista



Diana Langley
Diana Langley
Public Works Director
City of Yuba City



Karen Keene
Senior Legislative
Representative
California State Association
of Counties



Rural County Representatives of CA



Paul Manasjan
Director of Environmental
Affairs
San Diego County Regional

Airport Authority