



CITY OF BURBANK

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PUBLIC WORKS DEPARTMENT

November 21, 2014

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



Submitted via e-mail to: commentletters@waterboards.ca.gov

Comment Letter – Caltrans Prioritized Inventories

Dear Ms. Townsend:

The State Water Resources Control Board (State Water Board) adopted an order amending the State of California Department of Transportation's (Caltrans) NPDES permit on May 20, 2014 (Order WQ 2014-0077-DWQ). The amended permit requires Caltrans to comply with all adopted Total Maximum Daily Loads (TMDL) for which it has been assigned a waste load allocation, or which specify Caltrans as a responsible party. Section I.A.4. of Attachment IV in the amended permit requires Caltrans to submit the Prioritized Inventories, which must include an identification and ranking of reaches where Caltrans' discharges contribute to impairments addressed by TMDLs. Section I.A.4 of Attachment IV also requires that the State Water Board provide a 30-day public comment period on the Prioritized Inventories submission.

Caltrans is subject to over 80 TMDLs. To achieve the highest water quality benefit as feasible in the 5-year permit term, Caltrans is required to address discharges with the greatest impact on water quality first. Implementation projects will be selected on an annual basis from the highest priority reaches in the Prioritized Inventories.

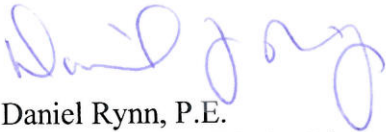
While the City of Burbank (City) applauds the prioritized inventory approach proposed for Caltrans's Municipal Separate Storm Sewer System (MS4) permit, the City does have the following comments:

- The Final Waste Discharge Requirements for MS4 Discharges within the Coastal Watersheds of Los Angeles County, Except Those Discharges Originating from the City of Long Beach MS4 (Final Order R4-2012-0175) require the Los Angeles basin permittees, including the City, to meet stringent receiving water limitation requirements. As a discharger to receiving waters within City limits, Caltrans' prioritized inventory approach would mean that certain TMDL constituents would not be addressed for 10, 15 or 20 years. In short, an exceedance in the receiving waters would target the Los Angeles basin permittees and not Caltrans, while knowing that Caltrans' prioritized inventory approach would convey State Highway discharges with no controls in place for certain constituents for a certain period of time. This would not be a fair circumstance for Los Angeles basin permittees.

- Due to higher vehicular speeds on State Highways, more debris, loose material, metals (i.e., copper brake pad), and at times, hazardous substances (i.e., big rig diesel spill due to accident) appear to be disposed on State Highways. While we applaud Caltrans for their non-structural Best Management Practice (BMP) efforts (i.e., street sweeping, catch basin cleanout, pick up of trash littering), the State Highways seem to lack the space/opportunity to install structural BMPs (i.e., most storm drain inlets are highway grates located along the highway shoulders). Given the higher vehicular speeds and lack of space/opportunities to install structural BMPs, the local Regional Water Quality Control Boards and State Water Board should endorse this prioritized inventory approach to all MS4 permits as Los Angeles basin permittees are also constrained with space, identifying opportunities to install local and large-scale BMPs, and securing adequate funding sources.

The City appreciates your consideration of our comments. Please contact me if you have any questions related to our comments.

Respectfully submitted,



Daniel Rynn, P.E.
Assistant Public Works Director
City of Burbank

cc: City Attorney's Office (Joe McDougall)