



City of Watsonville

"A Community of Opportunities"

Public Comment
Small MS4 Permit Amendment
Deadline: 7/20/17 by 12 noon



State Water Resources Control Board
Attn: Jeanine Townsend, Clerk to the Board
1001 I St., 24th Floor
Sacramento, CA 95814

July 12, 2017

SUBJECT: Comment Letter-Small MS4 Permit Amendment

The City of Watsonville is a State recognized economically disadvantaged community (DAC) based on population and median household income. The City has been implementing TMDL requirements for compliance with the State Water Resources Control Board Small Municipal Separate Stormwater System Phase II permit (MS4 permit). This permit has been extremely challenging to implement given the level of service and requirements needed to stay in compliance with the program.

Small DACs such as Watsonville simply do not have the revenue to comply with such extensive unfunded regulatory programs, and it puts undue financial burden on communities already struggling to meet basic public health and safety needs. **It is critical that economic feasibility be considered as part of permit regulations.**

The City kindly requests the State Water Resources Control Board to consider the following comments on the DRAFT provisions.

1. The pathogen TMDLs do not specify attainment of pathogen reductions for natural (birds and wildlife) and other uncontrollable sources, which account for the vast majority of contributions of fecal indicator bacteria (FIB). These uncontrollable sources in urban runoff and receiving waters may make attainment of waste load allocations and water quality objectives nearly impossible, particularly in urban areas. **The City requests that a variance be considered for TMDL impacted water bodies that have a WAAP for pathogens.**
2. Watsonville Slough Pathogens TMDL. P 70. Hanson Slough is not within the jurisdiction of the City of Watsonville's MS4 boundary. **The City requests that the waste load allocation be assigned to County of Santa Cruz.** As partner agencies we can work collaboratively but it will be challenging for the City to enforce since it is outside of the boundary.
3. Attachment G, p18, item 7. The modeling requirement for fecal coliform TMDLs is a new requirement. The practice of the State requiring municipalities to invest in modeling to prove compliance with TMDLs is cost prohibitive and takes away from other critical infrastructure resources. **The City would like to request a State standardized modeling program that is free for use for municipalities.**



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Thank you for your consideration. If you have further questions on these comments, please contact:
Jackie McCloud, Sr. Utilities Engineer at (831) 768-3172.

Sincerely-

Steve Palmisano
Director of Public Work and Utilities