



Utility Services/Land Use/ Energy Development Committee

City of Arts & Innovation

TO: UTILITY SERVICES / LAND USE / ENERGY DEVELOPMENT COMMITTEE MEMBERS **DATE: SEPTEMBER 11, 2017**

FROM: PUBLIC WORKS DEPARTMENT **WARDS: ALL**

SUBJECT: STATE WATER RESOURCES CONTROL BOARD REQUIREMENT TO SELECT THE METHOD IN WHICH THE CITY OF RIVERSIDE WILL COMPLY WITH THE STATE TRASH AMENDMENTS

ISSUE:

Review options for complying with the State Trash Amendments and consider recommending selection of a method for compliance.

RECOMMENDATION:

That the Committee review the options for complying with the State Trash Amendments and consider recommending selection of Track 1 or Track 2 to the City Council.

BACKGROUND:

The City Council met on August 22, 2017, with Councilmembers Gardner, Melendrez, Soubrou, and Conder present, to consider selection of a method to comply with the State Trash Amendments. After discussion, the Council voted to approve the following actions:

- A. Request a 90 day extension of time from the Santa Ana Regional Water Quality Control Board on the submission of the City's method of compliance
- B. Bring this issue before the Utility Services/Land Use/Energy Development Committee for discussion and recommendations
- C. Return to the City Council with the recommendation(s) of the Utility Services/Land Use/Energy Development Committee
- D. If the 90 day extension of time is not granted, notify the Santa Ana Regional Water Quality Control Board that the City's selected method of compliance is Track 2

The State Trash Amendments require all agencies with regulatory authority over 'Priority Land Uses' to install Full Capture Systems and/or implement programs that achieve Full Capture

System equivalency. The objective of these regulations is to fully capture all trash from Priority Land Use areas by no later than the year 2030.

Priority Land Uses

Priority Land Uses are areas with the following land uses or characteristics: High-density residential (10 units/acre or more), Industrial, Commercial, Mixed Urban, Public transportation stations. Within the City of Riverside, these areas encompass approximately 15 square miles and about 2,550 catch basins. Attachment 1 shows Priority Land Use areas of the City. Staff is conducting additional analysis of these areas at the parcel level to refine Priority Land Use areas and ensure accuracy.

Full Capture Systems

Full Capture Systems are structural devices that trap all particles 5mm or greater in size and have adequate treatment capacity for the area draining to the device. Full Capture Systems include individual devices installed in catch basins like: connector pipe screens, inlet filters, retractable screens, and other devices designed to capture trash and hold it in place. Other Full Capture Systems include trash nets, hydrodynamic separators, and screening devices installed in a location that serves a larger drainage area. Multi-benefit projects and low-impact development controls such as retention basins, wetlands, and green infrastructure projects may also qualify as Full Capture Systems.

Subject Mandate

As part of the execution of the Trash Amendments, the Santa Ana Regional Water Quality Control Board (Regional Water Board) sent a Water Code Section 13383 Order dated June 2, 2017. This order (Attachment 2) provides an overview of the options available to implement the Trash Amendments and required the City to submit a letter to the Regional Water Board identifying the City's selected method of compliance by August 31, 2017.

On August 23, 2017, at the direction of City Council, the City formally requested an extension of time on the submission of the City's method to comply with the Statewide Trash Amendments.

DISCUSSION:

The Trash Amendments provide two options for compliance:

- A. Track 1 requires the City to install, operate, and maintain Full Capture Systems for all storm drains within Priority Land Use areas throughout the City.
- B. Track 2 requires installation of Full Capture Systems where such installation is not cost-prohibitive. In other areas, other controls and/or projects can be utilized if they demonstrate Full Capture System Equivalency meaning that the same trash load that would be reduced if Full Capture Systems were installed must be reduced by some other means within Priority Land Use areas or alternative areas as approved by the Water Board.

Table 1

	TRACK 1	TRACK 2
Plan of Implementation	Install, operate and maintain full capture systems in storm drains that capture runoff from one or more of the priority land uses/facility/site.	Implement a plan with a combination of full capture systems, multi-benefit projects, institutional controls, and/or other treatment controls to achieve full capture system equivalency.
Time Schedule	10 years from first implementing permit but no later than 15 years from the effective date of the Trash Amendments.	10 years from first implementing permit but no later than 15 years from the effective date of the Trash Amendments.
Monitoring and Reporting	Demonstrate installation, operation, and maintenance of full capture systems and provide mapped location and drainage area served by full capture systems.	Develop and implement set of monitoring objectives that demonstrate effectiveness of the selected combination of controls and compliance with full capture system equivalency.

Track 1

Track 1 would see the City installing full capture devices in the storm drain system that serves a cumulative area of approximately 15 square miles. This may include installation of devices within individual storm drains such as inlet filters, connector pipe screens, and retractable screens or larger scale devices such as hydrodynamic separators and trash nets that are installed downstream of a larger area and capture all trash within that designated area.

The cost of Track 1 will depend on the types of devices installed but a reference amount can be established by estimating the cost of installing devices within individual catch basins. The State Water Board's Final Staff Report on the Trash Amendments cites the estimated average cost of a catch basin insert as \$800 and the estimated annual operation and maintenance cost as \$324. As stated in Table 1, implementation would occur over a ten year period which suggests about 255 full capture devices would be installed annually. Using these numbers as a baseline, a reference Track 1 cost estimate for the ten year implementation period cumulate to \$6,584,100 with an estimated \$826,200 annually thereafter for maintenance. The installation of larger scale devices covering large land areas have the potential of reducing maintenance costs and may thereby reducing the cost of Track 1. Public Works Engineering staff is currently evaluating the potential of utilizing larger scale devices in downstream storm drain channels and other areas prior to major receiving waters.

Track 2

Track 2 would see the City combining installation of full capture systems in certain areas with implementation of alternative methods that would fully capture trash in priority land use areas. Options for alternative methods of compliance could include:

- A. Full Capture Systems in Alternative Land Use Areas
- B. Enhancement and Enforcement of Litter Laws
- C. Increased Street Sweeping
- D. Increased Sidewalk Trash Bins
- E. Anti-Litter Education and Outreach Programs

Under Track 2, the City must develop and submit an implementation plan by November 30, 2018. Any method or combination of methods can be used in Track 2 as long as the City can demonstrate that they will be equivalent to the Full Capture System approach. To prove this Full Capture System equivalency, the City must:

- A. Determine the amount of trash that would be captured by the Track 1 approach
- B. Implement programs to remove an equivalent amount of trash
- C. Demonstrate equivalency through a technically acceptable approach subject to approval by the Regional Water Board
- D. Report Annually

The cost to implement Track 2 would be determined by the combination of programs and controls selected by the City and outlined in the implementation plan. Reports from the State Water Board and the San Francisco Public Utilities Commission show compliance costs could be slightly higher for Track 2 than Track 1. Staff discussions with other municipalities and consultants revealed mixed opinions on the cost of Track 2. Some opine that existing policies, control measures, and best practices already implemented within their cities could result in costs that are significantly less than Track 1. Others consider the cost of monitoring and demonstrating Full Capture System equivalency as a costly and staff-intensive endeavor that would ultimately be more expensive than Track 1. A quick survey of Track selection made by surrounding cities in the area revealed the following tentative selections:

- A. Ontario – Track 1
- B. Rancho Cucamonga – Track 2
- C. Fontana – Track 2
- D. San Bernardino – Track 1
- E. Corona – Track 1
- F. Moreno Valley – Track 1
- G. County of Riverside – Track 1

FISCAL IMPACT:

There is no fiscal impact resulting from recommending selection of a method of compliance. Costs associated with implementation of the selected method will be evaluated and presented as part of the budgeting process.

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availability of funds: Adam Raymond, Acting Chief Financial Officer/Treasurer
Approved by: Al Zelinka, FAICP, Assistant City Manager
Approved as to form: Gary G. Geuss, City Attorney

Attachments:

- 1. Priority Land Uses Map
- 2. Regional Water Board Order
- 3. Presentation