



CITY OF SANTA MARIA  
UTILITIES DEPARTMENT  
Business Services • Regulatory Compliance  
Solid Waste Services • Water Resources

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July 20, 2017

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



VIA ELECTRONIC MAIL TO  
COMMENTLETTERS@WATERBOARDS.GOV

**SUBJECT: COMMENT LETTER—SMALL MS4 PERMIT AMENDMENT**

The City of Santa Maria (“City”) appreciates the opportunity to comment on the proposed Small MS4 Permit Amendment (“Amendment”). The Amendment makes changes to Attachment G of the Small MS4 Permit to incorporate Water Quality Based Effluent Limitations (“WQBELs”) derived from the Wasteload Allocations (“WLA”) of certain Total Maximum Daily Loads (“TMDLs”).

The City is pleased that the Amendment acknowledges the important role that an integrated plan may play in compliance with WQBELs. The City has diligently worked over the past several years to develop the Santa Maria Integrated Plan (“Plan”), and intends to use the Plan to achieve compliance with water quality requirements, including WQBELs. The Amendment, which permits the City to use the Plan to comply with the WQBELs derived from WLAs in three TMDLs applicable to the City, is a crucial first step in linking the Plan to the City’s compliance with its regulatory requirements. Except as otherwise provided in this letter, the City therefore generally supports the Amendment.

To clarify and emphasize the important role that an integrated plan may play in achieving water quality requirements, the City asks that the State Water Resources Control Board (“State Board”) consider the following proposed additions or clarifications:

1. Amended Fact Sheet, Pages 67-68: This portion of the amended Fact Sheet discusses the Central Coast Water Board’s use of Wasteload Allocation Attainment Programs (“WAAPs”) as a comprehensive way to guide municipalities toward attainment of WQBELs derived from WLAs.

In addition to the discussion of WAAPs, the City requests that language be added to this section to acknowledge the role that integrated plans may similarly

play in achieving WQBELs. The City suggests the following paragraph for consideration: *Another comprehensive way that municipalities may seek to attain WQBELs is through the use of an integrated plan. In May of 2012, EPA issued its "Integrated Municipal Stormwater and Wastewater Planning Approach Framework" (Framework). The Framework outlines guiding principles of the integrated planning approach and sets forth anticipated elements of an integrated plan. The Framework allows for the use of flexibilities in the Clean Water Act to allow municipalities to plan for and timely achieve their water quality requirements. A properly developed integrated plan is a viable method for the attainment of water quality requirements. The State Board encourages Regional Boards to support the use of developed integrated plans by municipalities.*

2. Amended Fact Sheet, Page 81: This portion of the amended Fact Sheet sets forth the deliverables/actions required to comply with the Santa Maria River Watershed Fecal Indicator Bacteria TMDL.

In addition to the reference to the WAAP as the basis for compliance, the first sentence on page 81 should include the phrase "or other integrated plan" after the reference to the WAAP. This change is consistent with the language in the second paragraph on page 81 and in Attachment G.

3. Amended Fact Sheet, Page 83: This portion of the amended Fact Sheet sets forth deliverables/actions required to comply with the Lower Santa Maria River Watershed and Tributaries to Oso Flaco Lake Nitrogen Compounds and Orthophosphate TMDL.

In addition to the reference to the WAAP as the basis for compliance, the phrase "or other integrated plan" should be inserted after the reference to the WAAP. This is consistent with the language in Attachment G.

The City supports the way that the Amendment incorporates the use of integrated plans, however, the City remains concerned about the language in Attachment G related to the Santa Maria Toxicity and Pesticides TMDL. The City appreciates that the Amendment now includes specific references to provisions in the TMDL that permit the City to achieve compliance through participation in statewide programs addressing urban pesticide water pollution.

As reflected in the July 31, 2015 comment letter submitted by California Stormwater Quality Association (CASQA) on a previous draft of revisions to Attachment G, true progress on addressing pesticide issues will only come through State and Federal efforts to adequately assess and prevent urban water quality impacts from pesticide applications in urban areas. The City fought hard to have this reality recognized in the language of the adopted TMDL. To the extent that the Amendment incorporates the WLA of the TMDL in a manner that exceeds the requirements of the TMDL, the City objects to the Amendment.

The City appreciates this opportunity to submit the above comments to the Amendment. The City looks forward to receiving the State Board's support of the City's integrated planning effort through the State Board's consideration of the changes suggested in this letter.

A handwritten signature in black ink, appearing to read 'SHAD S. SPRINGER', is written over the printed name below.

**SHAD S. SPRINGER, P.E., MPA**  
Director of Utilities