



City of  
**SANTA CLARITA**

23920 Valencia Boulevard • Suite 300 • Santa Clarita, California 91355-2196  
Phone: (661) 259-2489 • FAX: (661) 259-8125  
[www.santa-clarita.com](http://www.santa-clarita.com)

March 2, 2015

Dr. Celine Gallon  
Los Angeles Regional Water Quality Control Board  
320 West 4th Street, Suite 200  
Los Angeles CA 90013

Dear Dr. Gallon:

Subject: Response to Triennial Review Solicitation – Submitting Organization City of Santa Clarita

This letter is regarding the January 29, 2015, request for data and information on water quality standards in the Los Angeles Region. The City of Santa Clarita and Los Angeles County are embarking on an Enhanced Watershed Management Plan (EWMP) to address many pollutants, including but not limited to zinc and *E. coli* bacteria. This effort will comprehensively address pollutants found in storm water through regional best management practices, green streets, and other types of infiltration best management practices.

Therefore, the City respectfully requests all pollutants remaining on the 303(d) list that anticipate a Total Maximum Daily Load (TMDL) in the future be changed to the category of “being addressed by action other than a TMDL.” In this case, the pollutants will be addressed through the action of development and implementation of the EWMP. As part of the EWMP, there was a pollutant prioritization process. Receiving water quality in the Santa Clara River watershed has been characterized based on available data. The characterization process consisted of the following steps:

1. Gathering relevant data and information from numerous sources including, but not limited to, 303(d) listings, WQBELs, RWLs, Surface Water Ambient Monitoring Program (SWAMP), annual reports, established TMDLs, Los Angeles Department of Public Works, and Los Angeles County Sanitation Districts;
2. Defining the EWMP area and identifying the water bodies within the EWMP area and downstream of the area that might be influenced by discharges from the EWMP area;
3. Conducting a data analysis to identify constituents with exceedances of water quality objectives;
4. Compiling water body pollutant combinations with TMDLs from Attachments L and O of the Los Angeles County Stormwater Permit;
5. Compiling 303(d) listings from the 2010 303(d) List; and
6. Comparing the data analysis to the State’s Listing Policy.



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A concise spreadsheet summary of the data review has been attached. Based on that research, the City requests the following for the upcoming 303(d) List. The affected water quality objectives are listed below.

### **Affected Waterbodies, Water Quality Objectives, and Suggested Revisions**

#### *Santa Clara River Reach 5*

Iron meets the criteria for delisting and should be removed from the 303(d) list based on the information attached. For mercury, copper, and TDS, all of these pollutants have been modeled and will be addressed by the development and implementation of the EWMP for the Upper Santa Clara River. Therefore these pollutants should be changed to the category of “being addressed by action other than a TMDL.”

#### *Santa Clara River Reach 6*

There have not been exceedances in the past five years for Bis-2 Ethylhexyl phthalate, Chlorpyrifos, and Diazinon; based on the information attached, all three should be delisted. In the case of Bis-2 Ethylhexyl phthalate, this was likely a byproduct of the laboratory testing process and not a pollutant found in the samples themselves.

For mercury, selenium, and zinc, all of these pollutants have been modeled and will be addressed by the development and implementation of the EWMP for the Upper Santa Clara River. Therefore, these pollutants should be changed to the category of “being addressed by action other than a TMDL.”

Toxicity should be removed from the 303(d) list, as it is a result and not a pollutant.

#### *Santa Clara River Reach 7*

For copper, mercury, and cyanide, all of these pollutants have been modeled and will be addressed by the development and implementation of the EWMP for the Upper Santa Clara River. Therefore, these pollutants should be changed to the category of “being addressed by action other than a TMDL.”

#### *Changing All Listings to “Being Addressed by Action Other than a TMDL”*

The pollutants currently on the 303(d) list which do not have an approved TMDL are iron, chlorpyrifos, copper, diazinon, iron, toxicity, algae, total dissolved solids, benthic macroinvertebrate bioassessments, chlorodibromomethan, DDT, dichlorobromomethane, PCBs, specific conductivity, Bis-2 Ethylhexyl phthalate, specific conductance. For these pollutants, if they remain on the 303(d) list, and any pollutants that might be added during this process, the City requests that all pollutants be in the category of “being addressed by action other than a TMDL,” instead of developing TMDLs in the Santa Clara River watershed.

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requests that all pollutants be in the category of “being addressed by action other than a TMDL,” instead of developing TMDLs in the Santa Clara River watershed.

*Contact Recreation Beneficial Use in the Santa Clara River*

The City respectfully requests a re-evaluation of the contact recreation beneficial use for the Santa Clara River – in particular Reaches 5, 6, and 7. For the most part, the Santa Clara River is very dry with no contact recreation or it is extremely dangerous during high flows when people could be in serious danger if they are recreating. The City requests that the Regional Board re-evaluate the beneficial use specific to *E. coli* and other bacteria for the listing. Wet weather bacteria standards and listings should not apply to the Santa Clara River when the contact recreation beneficial use does not exist.

**Order of Priority**

While we believe all of these requests should be included in the next listing, it is critical that the categorization for all listings that may be scheduled for TMDLs be changed to a category of “being addressed by action other than a TMDL,” using the EWMP process. Also, it is critical for delisting to occur so that limited resources are not being mismanaged by addressing a pollutant that no longer poses any threat.

The attached supporting information is a spread sheet summarizing the water quality data found. Also attached is the EWMP that includes a Water Quality Priorities section that summarized the pollutants and findings to be included in the EWMP, due to be submitted to the Regional Water Quality Control Board by June 28, 2015. Please contact me, should you have any questions about the information provided at (661) 255-4337 or by e-mail at [tlange@santa-clarita.com](mailto:tlange@santa-clarita.com).

Sincerely,



Travis Lange  
Environmental Services Manager

TL:HLM:ll

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Enclosure

cc: Robert Newman, Director of Public Works