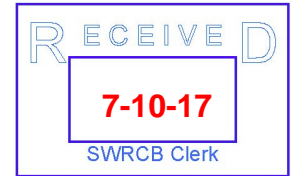




City of  
**SANTA CLARITA**

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June 10, 2017

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-2000

Dear Ms. Townsend:

Subject: Comment Letter – 303(d) List portions of the 2014 and 2016 California Integrated Report

Thank you for the opportunity to comment on the 303(d) List portions of the 2014 and 2016 California Integrated Report. The City of Santa Clarita (City) has two comments:

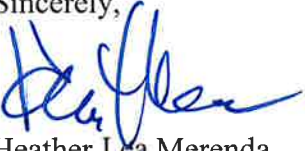
1. Any listings for the Santa Clara River in which multiple samples were collected on one day, we request that those samples be considered a single sample for that day rather than multiple samples. There are several cases that occurred in the Santa Clara River.
2. For the Santa Clara River, the City requests all pollutants remaining on the 303(d) list without a developed TMDL, the category be changed to the Category 4B for the Clean Water Act as "Being Addressed by Action Other Than a TMDL." The pollutants will be addressed through the long-term implementation of the Enhanced Watershed Management Program (EWMP). The Regional Board response that, "EWMPs are likely to make a significant improvement in water quality in the affected watersheds but, MS4 discharges may not be the only source of pollutants causing the impairment of these waterbodies" did not consider major facts in this watershed. During development of a the EWMP, the Reasonable Assurance Analysis determined the relative contribution of all the sources and all the actions necessary to restore affected waterbodies to a condition of full water quality standards attainment with the existing various permits in place throughout the Santa Clara River. Through the watershed wide monitoring program in place (started in 2013) that includes all major dischargers, the required adaptive management analysis that requires regular re-modeling of the Santa Clara River, the source assessment and linkage analysis expected of all sources entering the storm drain system would be found. If, through the extensive ongoing analysis required of the EWMP and the Santa Clara River, the above elements are insufficient, the State Board could reassess in the next 303(d) and revert back to Category 5 at that time. Given the age of the data and the current advanced work being done, "Being Address by Action Other Than a TMDL" seems

Ms. Jeanine Townsend  
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the most prudent and protective course of action for the Santa Clara River. This is also consistent with State Board and EPA policy on watershed planning.

Please contact me directly if there are any comments or questions regarding this document at [hmerenda@santa-clarita.com](mailto:hmerenda@santa-clarita.com) or at (661) 286-4098.

Sincerely,



Heather Lea Merenda  
Environmental Services Program Coordinator

HLM:ll

*S:\ENYSR\PCS\NPDES\2\TMDL\303(d) listing\UpperSantaClaraRiver Comment Ltr.doc*

cc: Darin Seegmiller, Environmental Services Manager