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City of
Santa Clarita

January 31, 2006

303 (d) Deadline:
1/31/06

Ms. Selica Potter, Acting Clerk to the Board
State Water Resources Control Board
Executive Office
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Revision of the Section 303(d) list

Dear Ms. Potter:

Thank you for the opportunity to submit comments on the proposed revisions to the Federal Clean Water Act Section 303(d) list. The City of Santa Clarita (City) is fortunate to have the Santa Clara River running through its boundaries along residential neighborhoods and businesses. As you know, this watershed is one of the last natural rivers in Southern California.

The City of Santa Clarita has concerns over the listing of several constituents on the 303(d) list of the Federal Clean Water Act for 2006 for Reaches 5 and 6 of the Santa Clara River. Although the City has concerns regarding how some of these constituents were listed (i.e. number of samples required for listing, applicability of Beneficial Use designations, possible implementation plans, etc), the City would like to provide detailed comments on the listing of diazinon for Reaches 5 and 6 of the Santa Clara River.

The listing criteria for Diazinon for Reaches 5 and 6 states that "A sufficient number of samples exceed the California Department of Fish and Game (CDFG) Aquatic Life Toxicity one hour average 0.08 mg/L and 4-day average 0.05 mg/L," and "Four water samples, two samples exceeding... were collected in October and November 2001."

The Listing Policy states that samples taken from the same location on the same day should be averaged. It should be noted that a total of four samples were taken by way of the Surface Water Ambient Water Monitoring Program (SWAMP) at station 403STCNRB with two samples each on October 30, 2001 and November 13, 2001. Considering the samples taken on the same day must be averaged, the resulting average values are 0.054 ug/L for the October 30, 2001 samples, and 0.11 ug/L for the November 13, 2001 samples. The result is a single exceeding value.

In addition, upon receipt of notification of a 13267 letter from the Regional Water Quality Control Board in September of 2002, the City and County of Los Angeles embarked on a very aggressive, targeted Public Outreach and Abatement program.



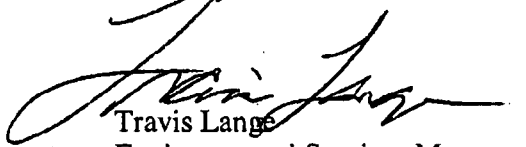
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Inspections, enforcement, local retailer cooperation, and public cooperation led to a drastic reduction of diazinon levels in comparison to the original samples. Recent samples indicate Non-Detect for this constituent. Though this information was provided to the Regional Board, no response to the final report has been given. In addition, the sale of diazinon-containing pest products has been banned by the United States Environmental Protection Agency (EPA) as of December 31, 2004. It is reasonably expected that the EPA's action will essentially eliminate all urban usage of diazinon, once existing stocks have been used up.

The aggressive investigation as to the cause of the release of this constituent in the Santa Clara River and the public outreach have proven to be very successful in combating this specific pollutant. The intent and purpose of this tremendous effort was to stop the contamination as quickly as possible, at its source, and to minimize any environmental damage. Another motivating factor was to avoid a costly, time consuming TMDL for diazinon. With the EPA's diazinon ban and the City's efforts it is reasonable to expect this constituent has been addressed. The EPA's phase out of diazinon is an existing regulatory program that is reasonably expected to result in attainment of the diazinon evaluation guideline within a reasonable timeframe. Therefore the City requests leaving diazinon off the 303(d) list for Reaches 5 and 6 of the Santa Clara River for this 303(d) listing cycle. We further request diazinon be placed on the Water Quality Limited Segments Being Addressed list so that it doesn't get forgotten and can be re-evaluated during the next 303(d) listing process.

It is the City's goal to protect water quality in the Santa Clara River watershed. Thank you for your time and consideration of our comments and requests. Please contact Oliver Cramer, Environmental Analyst, at (661) 255-4904 or ocramer@santa-clarita.com if you have any questions or need any additional information.

Sincerely,



Travis Lange
Environmental Services Manager

TL:OC:kdl

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cc: Mayor Weste and Members of the City Council
Ken Pulskamp, City Manager
Ken Striplin, Assistant City Manager
Oliver Cramer, Environmental Analyst



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Fax Transmittal

TO: Selica Potter

DATE: January 31, 2006

FAX NUMBER: (916) 341-5620

FROM: Travis Lange
City of Santa Clarita

NUMBER OF PAGES: 3 (including cover sheet)

REMARKS: Comment letter regarding "Revision to Federal Clean Water Act Section 303(d) List of Water Quality Segments of California"
Hard Copy to follow

Santa Clara River, Reaches 5 and 6

TRANSMITTED BY: Oliver Cramer
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