April 15, 2016

John M. Robertson
Executive Officer
Central Coast Regional Water Quality Control Board
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San Luis Obispo, CA 93401-7906

VIA ELECTRONIC MAIL jrobertson@waterboards.ca.gov

SUBJECT: CITY OF SANTA MARIA INTEGRATED PLAN FOR WATER QUALITY

Dear Mr. Robertson:

The City of Santa Maria ("City") is pleased to submit the enclosed draft of the Santa Maria Integrated Plan ("Integrated Plan") to the Central Coast Regional Water Quality Control Board ("Regional Board") for its review and comment. The draft Integrated Plan is the culmination of two years of collaborative effort by the City, staff at the Environmental Protection Agency ("EPA"), City and EPA consultants, Regional Board staff, and watershed stakeholders.

The Integrated Plan attempts to consolidate into one document all of the City's water quality requirements and outlines specific and measurable steps the City will take to address those requirements. It seeks to protect and improve water quality and quantity in the Santa Maria River Watershed and Santa Maria Groundwater Basin, to apply the City's resources cost-effectively towards feasible and flexible actions that achieve the greatest improvements in water quality and quantity, and to promote the beautification of the City.

The Integrated Plan arises out of and is supported by several recent federal, state, and local actions. First, the Integrated Plan is structured around EPA's May 2012 "Integrated Municipal Stormwater and Wastewater Planning Approach Framework" ("Framework"). As reflected in EPA's Framework, integrated planning "will assist municipalities on their critical paths to achieving the human health and water quality objectives of the CWA by identifying efficiencies in implementing requirements that arise from distinct wastewater and stormwater programs, including how best to make capital investments."

Second, the Integrated Plan follows upon the State Water Quality Control Board's ("State Board") June 2015 precedential order (WQ 2015-0075) upholding the "alternative compliance pathway" for achieving compliance with receiving water limitations. The State Board's Order recognized that under certain conditions a watershed management plan could be used as a vehicle to demonstrate compliance with receiving water limitations.
Third, the Integrated Plan is designed to implement the requirements of the Regional Board's Bacteria, Nutrient, and Pesticide TMDLs for the Santa Maria River Watershed.

The City began work on the Integrated Plan concept in January of 2014, when it developed the Santa Maria Integrated Plan White Paper, a document that the City then shared with Regional Board and EPA staff. In 2014, the City held several meetings with Regional Board staff to discuss the Integrated Plan approach and sponsored a tour of the City for the Regional Board Executive Officer in place at that time. The City was also fortunate to obtain EPA support for the Integrated Plan effort from EPA in the form of consultant technical support.

In 2015, the City worked with its consultant Larry Walker Associates and the EPA-funded consultant Tetra Tech to develop the Integrated Plan. As part of this effort, the City held a Public Meeting in March of 2015 (attended by approximately 40 people) to solicit input on the planning process and a Stakeholder Workshop on August 19, 2015 to focus on the project assessment tool included in the Integrated Plan. Regional Board staff, including Lisa McCann, attended those meetings, was included in the consultant selection process, participated on multiple conference calls with the consultants and the EPA, and reviewed technical papers that have become the basis for the Integrated Plan. The City greatly appreciates Regional Board staff's participation in this process, and looks forward to continuing this partnership as the City now addresses the details of the Plan.

As outlined in the draft Integrated Plan, the City's drainage system, which predominately consists of several constructed channels and distributed detention and retention basins, offers significant capture, treatment, and infiltration opportunities. This system is already helping the City to capture 68 percent of the average annual runoff volume, 67-73 percent of the average annual loads of TMDL pollutants from the City's MS4, and 47-66 percent of the total MS4 and non-MS4 loads from discharging to the Santa Maria River during an average water year. With the implementation of the additional projects identified in the Integrated Plan, and with the continuation of the City's core water quality programs, the City believes that compliance as outlined in the Integrated Plan is achievable and will result in significant watershed benefits.

The City realizes that Regional Board staff has not had an opportunity to review the draft Integrated Plan, and it will take time to complete the review and comment process. As Regional Board staff commences its review, however, the City wishes to provide an initial outline of how City staff envision the Integrated Plan being used in the future by the Regional Board and by the City. This will certainly be the subject of further discussion between the Regional Board and the City. With that understanding, the City believes it is important to provide the Regional Board with the City's current vision of how it intends to use the Integrated Plan in the future.

The City anticipates that both the City and the Regional Board will use the Integrated Plan as the overarching plan for the City's water quality and quantity program. In addition to implementing the Plan, the City will consider including the Integrated Plan in its City General Plan, which guides all of the City's actions. By including the Integrated Plan into the General Plan, the City will help make sure that all of its actions consider water quality. The City also intends to use the Integrated Plan as the basis for measuring regulatory compliance at the Santa Maria River rather than in each individual component of the City's drainage system.
On the Regional Board’s side, the City anticipates that the Integrated Plan will be implemented in three phases — short-, mid-, and long-term. In the short-term, the City would like the Regional Board to consider adopting a resolution that accepts the Integrated Plan and allows its use as compliance for existing regulatory requirements. Specifically, the Integrated Plan is designed to serve as the City’s Wasteload Allocation Attainment Plan for the TMDLs and the City’s Program Effectiveness Assessment and Improvement Plan.

In the mid-term, the City would like to work with the Regional Board to consider the development of an individual NPDES permit and individual Waste Discharge Requirements built on the Integrated Plan. Such a tailored regulatory approach informed by the Integrated Plan will allow the City to fully implement the Integrated Plan consistent with regulatory requirements.

In the long-term, the City and the Regional Board may wish to consider the feasibility of a watershed-based permitting approach that builds off the Integrated Plan but extends the regulatory approach beyond the City’s jurisdiction. Such an approach is at least worthy of future consideration as a way to improve overall watershed health.

The City looks forward to continuing this discussion with the Regional Board staff and to receiving comments on the draft Integrated Plan. For any questions during review of the enclosed draft, please contact me at (805) 925-0951 extension 7211 or sspringer@cityofsantamaria.org.

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

Enclosure: Draft Integrated Plan

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