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January 21, 2015

VIA E-MAIL [COMMENTLETTERS@WATERBOARDS.CA.GOV]



Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95812-0100

Re: Comments to A-2236(a) - (k)

Dear Ms. Townsend:

This comment letter is submitted on behalf of the City of Santa Maria. Santa Maria is located in the Central Coast Region and is enrolled under the State Board's Phase II Storm Water General Permit. For many years, the City has been working to develop an integrated, watershed approach to addressing its water quality requirements. The City believes that such an integrated approach will achieve better water quality results, will help the City prioritize its limited resources on the largest problems, will result in multiple community benefits, including enhanced groundwater replenishment, and will build broader community and stakeholder support for the City's program. The City was one of five cities in the Nation to receive an EPA technical assistance grant to help develop an Integrated Plan. The City is working toward completing such a plan by the end of 2015.

The watershed compliance approach upheld in the draft order is an important component of an integrated, watershed approach because it provides a clear regulatory path to compliance through long-term, watershed-based solutions. The City therefore supports the State Board's decision to uphold that approach. The State Board, preferably in this order but at a minimum through other appropriate means, should consider directly extending such an approach to the Phase II Permit. Extending the approach to the Phase II program now would provide Santa Maria and other Phase II permittees with additional regulatory certainty to make the investment in pursuing the types of integrated, watershed approaches that enjoy broad scientific and regulatory support as the best way to address water quality challenges. For these reasons, the



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City supports the decision to uphold the watershed compliance approach and urges the State Board to extend that approach to the Phase II Permit.

Very truly yours,

A handwritten signature in black ink, appearing to read 'SHAG', written over a horizontal line.

Shawn Hagerty
of BEST BEST & KRIEGER LLP

cc: Shad Springer
Ellen Pritchett
Michelle Ruiz