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UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

4/18/07 BdMtg Item 7
 Upper Santa Clara River
 Deadline: 4/4/07 noon

April 2, 2007
 Via email

Tam M. Doduc, Board Chair
 State Water Resources Control Board
 1001 I Street
 Sacramento, CA 95814

Comment Letter – Upper Santa Clara River Chloride TMDL



Madam Chair and State Board Members,

United Water Conservation District supports the shortened implementation period for the Upper Santa Clara River Chloride TMDL, as approved by the Los Angeles Regional Water Quality Control Board in Resolution R4-2006-016. The special studies allowed by the TMDL are proceeding on schedule, and to date these studies have not produced information that would justify a prolonged implementation schedule for compliance with the chloride Water Quality Objective in Reaches 5 and 6 of the Santa Clara River. The implementation milestones are also an important and appropriate addition to the TMDL, given the long history of delays that have plagued regulatory efforts to remedy chloride pollution in the Upper Santa Clara River.

United Water Conservation District represents agricultural and municipal water interests in the Ventura County portion of the Santa Clara River valley, and takes an active role in a wide range of water management activities. We have been working on chloride issues with the Los Angeles RWQCB for more than ten years. Progress has been slow, and chloride impacts to the groundwater of the Piru basin (immediately downstream of Reach 5, where much of the river water percolates as groundwater recharge) have expanded during this period. For many years, and especially during times of drought, the chloride problem was blamed on State Water Project imports to the population centers of the upper Santa Clara River. In recent years, self-regenerating water softeners were identified as a large source of chloride in the watershed. Regulatory pressure has motivated significant local programs to reduce the use of water softeners in the TMDL area. Addressing the impacts of chloride loads in imported water supplies will likely prove more difficult, especially during dry years such as this. We feel the shortened



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implementation schedule is an important step towards reducing chloride loads to the upper Santa Clara River. We agree with the State Board staff recommendation to approve the Basin Plan amendment to shorten the TMDL implementation period to eleven years. We urge that the State Board approve the amendment as written.

Sincerely,

Dana L. Wischart
General Manager

Cc BDRF
Sam Ungcr, LA RWQCB