April 3, 2007

Song Her, Clerk to the Board Fax# 916-341-5620
State Water Resources Control Board,
1001 I Street,
Sacramento, CA 95814

RE: Comment Letter- Upper Santa Clara River Chloride TMDL

Dear Board Chair:

The Ventura County Board of Supervisors would like to express its support for the approval of the Basin Plan amendment proposed by the Los Angeles Regional Water Quality Control Board, Resolution No. R4-2006-016.

As the County’s Supervisors, our primary roles and responsibilities are not only to protect, but also to promote the environmental and economic well-being of the County. We are proud that the Santa Clara River is the largest river system in Southern California which remains in its relatively natural state.

As the tenth largest farming county in California, and the United States, the existence of this billion dollar agricultural industry depends upon this river and the quality of the water received downstream. In light of the increasing quantitative and qualitative constraints on our State’s water supplies, it is our priority to maintain and protect our limited local water resources.

The Upper Santa Clara River chloride TMDL is relatively straightforward. This TMDL deals with one single pollutant with a well-understood chemistry. The major sources of this pollutant are two apparent point sources where loading is fairly easy to estimate (as opposed to a non-point source). The Implementation of Compliance Measures put forward by the Los Angeles Regional Water Quality Control Board represents a reasonable and timely path to the solution.

For these reasons, the Ventura County Board of Supervisors adopted a resolution today requesting that the State Water Resources Control Board adopt its Staff recommendations to:

1) Approve the Basin Plan Amendment adopted by the Los Angeles Water Board Resolution No. R4-2006-016; and
2) Authorize the Executive Director or designee to submit the amendment adopted under the Los Angeles Water Board Resolution No. R4-2006-016 to the State Office of Administrative Law for concurrence on its non-regulatory and regulatory status and to the U. S. Environmental Protection Agency for informational purposes.

Respectfully submitted,

[Signature]

Linda Parks, Chair
Ventura County Board of Supervisors
RESOLUTION OF THE BOARD OF SUPERVISORS
COUNTY OF VENTURA
SUPPORTING ADOPTION OF THE BASIN PLAN AMENDMENT
PROPOSED BY THE LOS ANGELES REGIONAL WATER QUALITY CONTROL BOARD,
RESOLUTION NO. R4-2006-016

Whereas, the Los Angeles Water Board adopted changes to the Chloride TMDL Implementation Plan under Board Resolution No. R4-2006-016 on August 3, 2006; and

Whereas, the revised TMDL accelerates the implementation schedule from 13 to 11 years for attaining the water quality standards set forth by the Board in Board Resolution No. 04-004; and

Whereas, the revised TMDL includes implementation milestones for TMDL planning; and

Whereas, the TMDL requires the Los Angeles County Sanitation Districts ("Districts") to implement certain studies and actions to reduce chloride loadings from the reclamation plants operated by the Districts in the Santa Clarita Valley; and

Whereas, the Board found that the key technical issues of cumulative chloride impacts to groundwater will be addressed by a ground water and surface water interaction model to be developed by the Los Angeles Water Board and the Districts by November 24, 2007; and

Whereas, with completion of the literature review, the evaluation, and the ground water and surface water interaction model, the Board found that sufficient information will be available for initiating certain tasks to implement compliance measures to meet the chloride objectives within the revised schedule; and

Whereas, the remaining tasks under the TMDL, such as development of Site-Specific Objectives, an anti-degradation analysis, etc. will all remain in place in this amendment;

Now, Therefore, Be It Resolved, that the Ventura County Board of Supervisors hereby requests that the State Water Resources Control Board; (1) approve the Basin Plan Amendment adopted under the Los Angeles Water Quality Control Board Resolution No. R4-2006-106 on August 3, 2006; and (2) authorize the Executive Director or designee to submit the amendment adopted under Los Angeles Water Board Resolution No. R4-2006-016 to the State Office of Administrative Law for concurrence on its non-regulatory and regulatory status and to the U.S. Environmental Protection Agency for informational purposes.

VC Board of Supervisors
Resolution supporting adoption of the Basin Plan Amendment adopted by the Los Angeles Water Quality Control Board under Resolution No. R4-2006-016.
April 3, 2007

Upon motion of Supervisor Long, seconded by Supervisor Bennett, and duly carried, the foregoing resolution was approved on April 3, 2007.

Chair, Board of Supervisors