

# NEWHALL LAND

The Newhall Land and Farming Company  
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Phone 661-255-4000 Fax 661-255-0761

March 30, 2007

***Sent Via Email; Copy by Mail***

California State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, California 95814  
Attn: Clerk of the Board



Re: Revision of the Upper Santa Clara River Chloride TMDL Implementation Plan  
Los Angeles Region (4) Water Quality Control Plan- Basin Plan Amendment

Clerk of the Board:

Newhall Land appreciates the opportunity to provide comments on the Basin Plan Amendment to revise the Upper Santa Clara River Chloride TMDL Implementation Plan. While we recognize that elevated chloride concentrations in the Santa Clara River present an important water quality concern, we request the State Board extend the comment period until it has been demonstrated that the Basin Plan Amendment is a necessary, appropriate or effective approach to address Santa Clara River chloride issues.

By approving the Basin Plan Amendment, the State Board would materially undermine the current substance and structure of the adopted TMDL. Consistent with SWRCB policy, the current TMDL requires the completion of a number of studies, and implementation and evaluation of source controls on an adaptive basis, prior to requiring implementation of extremely expensive advanced treatment implementation measures.

The acceleration of the implementation schedule is also inconsistent with the purpose and intent of the provisions of the TMDL related to evaluation and re-opening of the Implementation Plan. The "re-opener" was not intended under the adopted TMDL to result in revisions to the TMDL that undermine studies and data collection already known to be important to understanding how to properly address chloride water quality issues in the Santa Clara River.

Therefore, we respectfully request that the State Board maintain the current TMDL implementation measures and the current implementation schedule. We have attached our June 19, 2006 comment letter to the Regional Board concerning the proposed Implementation Plan revision (see attached) that further describes our concerns.

Newhall Land thanks you for the opportunity to comment on this important issue. Please contact me at 661-255-4259 to discuss our comments or any address questions you may have.

Sincerely,  
NEWHALL LAND & FARMING COMPANY

A handwritten signature in black ink, appearing to read "Matt Carpenter".

Matt Carpenter  
Director, Environmental Resources

cc: S. Unger  
M. Subbotin

**ATTACHMENT**

**Newhall Land June 16, 2006 Comment Letter to Los Angeles Regional Board  
Regarding Proposed Implementation Plan Revision**

# NEWHALL LAND

The Newhall Land and Farming Company  
23823 Valencia Boulevard, Valencia, CA 91355  
Phone 661-255-4000 Fax 661-255-0761

June 19, 2006

*Sent Via Email; Copy by Mail*

California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, California 90013  
Attn: Chairman, H. David Nahai

Re: Upper Santa Clara River Chloride TMDL Implementation Plan Reconsideration

Dear Mr. Nahai:

We appreciate the opportunity to provide comments on the proposed revision to the Upper Santa Clara River Chloride TMDL Implementation Plan. While we recognize that elevated chloride concentrations in the Santa Clara River present an important water quality concern, we do not believe that the proposed revision to the TMDL Implementation Plan is a necessary, appropriate or effective approach to address Santa Clara River chloride issues.

There are two fundamental problems with the proposed revision to the TMDL:

- A. The proposed revision is inconsistent with the substance and structure of the adopted TMDL and with the prior State Water Resources Control Board remand order, and presents an unreasonably short implementation schedule for advanced treatment and brine line disposal.
- B. The proposed revision is not supported by sufficient technical justification to warrant such a major change to the structure of the TMDL, and it is not clear that the change will effectively improve water quality.

In light of these two fundamental problems, we request that the Regional Water Quality Control Board – Los Angeles Region (“Regional Board” or “RWQCB”) should maintain the current TMDL implementation measures and the current implementation schedule. In addition, we request that the Regional Board consider further addressing chloride concentrations in the Santa Clara River by creating milestones for implementation of a collaborative stakeholder process to develop regional salt management solutions, which would supplement the current implementation measures and special studies of the adopted TMDL. Other Regional Water Quality Control Boards, including the Central Valley and Santa Ana Boards, are successfully implementing collaborative regional pollutant management approaches to attain maximum water quality benefit in the most practical and cost-effective way. These efforts provide an excellent model for the Los Angeles Regional Board’s consideration.

**A. Inconsistency with substance and structure of adopted TMDL and SWRCB Remand Order, and unreasonably short revised implementation schedule.** The proposed acceleration of the TMDL schedule constitutes a major change in the substance and structure of the adopted TMDL, is contrary to the SWRCB Remand Order, and presents an unreasonably short implementation schedule for advanced treatment and brine line disposal. As a result, the acceleration of the implementation plan is inappropriate, arbitrary and capricious.

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By adopting the proposed revision, the Regional Board would materially undermine the current substance and structure of the adopted TMDL. Consistent with SWRCB policy, the current TMDL requires the completion of a number of studies, and implementation and evaluation of source controls on an adaptive basis, prior to requiring implementation of extremely expensive advanced treatment implementation measures. *Los Angeles Regional Water Quality Control Board Resolution No. 04-004, p.3.* The proposed revision undermines this TMDL approach by essentially predetermining that, regardless of the outcome of studies that have not yet been completed, an SSO will not be adopted for any reach of the Santa Clara River. The current TMDL is based upon the prior determination that these studies are necessary to more fully understand the issues associated with the effects of chloride in the Santa Clara River before steps are taken to implement extremely expensive treatment options. By revising the Implementation Plan as proposed before completing the remaining ongoing studies, such as the GSWI and cost studies, the Regional Board for all intents and purposes is determining that the outcome of the studies is irrelevant and that advanced treatment and brine line disposal must be implemented despite an acknowledged chloride gradient between the Valencia WRP (or the most downstream major WRP point source discharge) and Blue Cut (or near the most upstream agricultural surface water diversion), and despite the potential assimilative capacity for chloride that the Santa Clara River may exhibit. *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration, p. 12.* Further, the Regional Board is predetermining that SSOs are not a potentially appropriate way to protect beneficial uses by adoption of water quality objectives that become stricter as they approach the point of actual beneficial use. The TMDL Implementation Plan as adopted is designed to attain substantial evidence to support or refute conclusions such as these before they are made. The acceleration of the proposed TMDL implementation schedule eliminates the steps necessary to collect that evidence required to support those conclusions, and instead relies upon misleading and oversimplified exceedance probability calculations to replace the studies and data collection mandated by the adopted TMDL.

The acceleration of the implementation schedule is also inconsistent with the purpose and intent of the provisions of the TMDL related to evaluation and re-opening of the Implementation Plan. While the Regional Board may have the authority to revisit TMDLs when such action is appropriate and supported by substantial evidence and sufficient technical justification, here the Regional Board relies on the "re-opener" in Task 4 of the TMDL Implementation Plan as the stated reason for revisiting and restructuring the adopted TMDL. However, the "re-opener" was not intended under the adopted TMDL to result in revisions to the TMDL that undermine studies and data collection already found to be important to properly address chloride water quality issues in the Santa Clara River.

The "re-opener" provides solely that the Regional Board is to re-evaluate the schedule for Task 6, the assessment of an appropriate chloride threshold, and the schedule for subsequent linked tasks as to the needed to conduct additional necessary studies based upon the outcome of earlier tasks. *Upper Santa Clara River Chloride TMDL Implementation Schedule Task 4.* The language and context of the "re-opener" strongly indicates that its purpose is to extend the compliance schedule, rather than to shorten it, if the outcome of early tasks indicates that additional studies and evaluation are needed prior to implementation of additional water quality measures. *Id.* The re-opener provision does not contemplate a wholesale revision of the TMDL Implementation Plan after 12 months, based on incomplete studies and data. The Regional Board should tailor its action to be consistent with the intent of the adopted TMDL implementation plan, and to follow its step-wise process of investigation and action, consistently with the substance and content of the adopted TMDL, including its "re-opener."

The wholesale revision of the implementation program as proposed is also inconsistent with SWRCB remand of the original chloride TMDL Implementation Plan (SWRCB Resolution No. 2003-0014) ("Remand Order"). The Remand Order stated that the Regional Board was to consider:

"expansion of the current phased-TMDL approach so that the County Sanitation Districts of Los Angeles County can complete their implementation tasks by Regional Board specified dates sequentially and within 13 years of the effective date of the TMDL. If advanced treatment facilities and disposal facilities are found to be necessary for compliance with the TMDL, the Regional Board may consider extending the implementation schedule as necessary to account for events beyond the control of the County Sanitation Districts of Los Angeles County." *SWRCB Resolution No. 2003-0014.*

The accelerated Implementation Plan proposed by the Regional Board is inconsistent with the prior Remand Order of the SWRCB, which required the Regional Board to expand the TMDL schedule to allow study, evaluation and implementation tasks to be completed sequentially. The proposed accelerated implementation schedule requires compliance within a shorter time frame and does not allow the completion of tasks in sequence, but rather requires that the certain actions be taken prior to the completion of other tasks, such as the GSWI study, without the data generated by those tasks. As a result, the implementation tasks mandated are required based on assumptions rather than on TMDL study results. This approach is inconsistent the SWRCB's Remand Order.

In addition, the Remand Order provided that if advanced treatment facilities and disposal facilities were found to be necessary to achieve compliance that the Regional Board "may consider extending the implementation schedule." *Id.* However, under the proposed Implementation Plan the Regional Board is doing just the opposite of what was contemplated in the SWRCB's Remand Order by basically mandating advanced treatment and brine line disposal and requiring compliance within a *shorter* time frame than the 13 year period provided in the adopted TMDL and SWRCB Remand Order.

The inconsistency of the proposed TMDL revision with the SWRCB Remand Order highlights the fact that the accelerated implementation schedule for advanced treatment and brine line disposal is unreasonably short. The proposed accelerated compliance schedule does not take into account the significant efforts that must go into advanced treatment and brine line disposal, including the substantial permitting issues that necessarily would be raised if a new pipeline were to be constructed and/or if the Crimson pipeline were to be converted into a brine line (assuming that such conversion is feasible). Further, the proposed revision fails to evaluate the water quality issues associated with the brine line effluent discharges into the ocean that will result from adoption of a new, advanced treatment technology-forcing schedule. Brine line discharges will likely contain dissolved copper and other pollutants of concern that could create other adverse salt water quality effects that must be considered carefully before adopting measures that may benefit chloride, but in the larger picture may degrade water quality. Because the proposed TMDL revision mandates an unreasonably short schedule for implementation of advanced treatment and brine line disposal, the proposed amendment does not effectively assure the desired outcome of accelerated compliance with the TMDL.

**B. Insufficient Technical Justification.** A second fundamental problem with the proposed acceleration of the implementation schedule is the insufficient technical justification for the proposed amendment. The proposed acceleration of the implementation schedule is based on assumptions rather than reliable scientific data, and is premature. Without sufficient technical justification, the proposed

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change in the Implementation Plan would constitute an arbitrary and capricious action at this point in time.

The technical justification for the proposed acceleration of the TMDL Implementation schedule as set forth in the Regional Board's Staff Report is premature and insufficient for at least five reasons.

First, the primary justification presented for accelerating the TMDL implementation schedule is the Staff Report finding that current implementation measures will not achieve chloride water quality objectives. Based on analysis of wastewater reclamation plan (WRP) effluent concentrations, historic chloride levels in imported State Water Project (SWP) water supplies, and estimates of water quality objective exceedance frequencies, and monitoring for TMDL source control implementation measures,<sup>1</sup> the Staff Report concludes that the Implementation Plan will not be sufficient to reduce chloride concentrations in the upper Santa Clara River to levels consistently below the existing chloride water quality objective of 100 mg/L. However this conclusion that the chloride water quality objective is unattainable is not based on sound facts and analysis, and is premature.

With respect to WRP effluent and historic SWP water supply chloride concentrations, the Staff Report analyzes the difference in chloride concentrations in WRP effluent as compared to imported State Water Project (SWP) water, and determines that the difference is increasing, requiring implementation of advanced treatment. *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration*, p. 17-18. However, for the purpose of the Staff Report analysis, SWP water supply chloride data has been repeatedly confused with, or inappropriately used in place of, the actual Santa Clarita Valley (SCV) *blended* water supply chloride data. The blended water supply consists of SWP water plus local groundwater, with SWP contributions ranging from 50-70% over the past 5 years. Actual blended water supply chloride data should instead be used to discern non-water supply chloride contributions (or SRWS and non-SRWS contributions, as defined in the Staff Report) to effluent discharges. Specifically, the difference between SCV WRP effluent chloride concentrations and the *blended* water supply chloride concentrations, not the SWP water supply chloride concentrations, should be used to discern non-water supply related chloride contributions. The use of SWP water supply chloride data rather than actual blended water supply data appears to be at the root of numerous erroneous and misleading findings in the Staff Report related to trends in SRWS and non-SRWS chloride loading. If the analysis were amended to include 2005 data chloride data, and to consider blended water supply chloride concentrations considered rather than SWP water supply concentrations, no increasing SRWS and non-SRWS chloride loading trend would be found. As a result, a finding that advanced effluent treatment and brine line disposal will be required to achieve the chloride water quality objective is premature, and acceleration of the implementation schedule not warranted at this time.

With respect to estimates of water quality objective exceedance frequencies, the technical justification for revising the TMDL implementation plan is insufficient because it is not clear from the Staff Report that the exceedance frequency calculations (which are based on SRWS removal scenarios) have been conducted in a manner that would yield accurate or meaningful predictions of water quality objective exceedance frequencies.<sup>2</sup> Los Angeles County Sanitation District (LACSD) staff estimate that during typical, non-drought conditions, with 100% reduction in SRWS loads, SCV WRP effluent would

<sup>1</sup> The source control implementation measures, among other things, ban the installation of new self-regenerating water softeners (SRWS) in the Santa Clarita Valley.

<sup>2</sup> A general criticism we have with the exceedance frequency analysis shown on p. 13 of the Staff Report is that the assumptions and data sources upon which it is based are not explicitly provided, thereby making a thorough review impossible. The Staff's calculation approach should be made more transparent.

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achieve 100% compliance with a 117 mg/L objective, a value that represents the upper boundary of the Literature Review Evaluation (LRE) guideline range. Even at 50% SRWS reduction, SCV WRP effluent could achieve 100% compliance with a 140 mg/L objective applied at the end-of-pipe. These reported estimates are important because if the typical 40 mg/L Valencia-to-Blue Cut chloride gradient (as identified on p. 12 of the Staff Report) is properly applied to reported LACSD exceedance estimates, compliance with the 100 mg/L objective could be achieved at the point-of-use (Blue Cut), therefore protecting downstream salt-sensitive agriculture supply uses, according to the LRE guidelines. Therefore, the Staff Report conclusion that chloride water quality objectives are unattainable lacks technical support and is premature. Further, the LACSD information highlights the need to provide adequate time to complete the GSWI and SSO studies required by the current TMDL, interpret the implications of the study results, and then develop and adopt reasonable, science-based policies for chloride control that take the study results into account (including final wasteload allocations and NPDES permit limits).

With respect to monitoring data for TMDL source control implementation measures, the conclusion that SRWS source controls cannot attain the existing chloride water quality objective is not supported because receiving water monitoring data documenting the impact of SRWS reduction has not been collected for a sufficient period of time to reach meaningful conclusions about the effects of the SRWS ban on chloride concentrations. The ban on prospective use of SRWS systems was enacted in March 2003, and public outreach (including a rebate program) focused on retirement of existing SRWS systems began in March 2004. TMDL implementation measure monitoring data relied upon in the Staff Report is reported only through December 2004. Given the very short post-SRWS ban monitoring period, conclusions regarding SRWS-related chloride loading trends could very easily be confounded by other influencing factors, such as the drier than normal conditions which persisted until the 2004/05 wet season. Such factors cannot be properly understood from such a brief analysis period.

Perhaps more importantly, concluding that the chloride water quality objective is unattainable based upon implementation measure monitoring data from such a short monitoring period ignores the fact that, consistent with an adaptive management approach to TMDL implementation and water quality improvement, chloride source control measures can (and must) be implemented in the future in different ways to improve their efficacy as necessary to achieve water quality objectives. For example, the original ban on prospective SRWS systems is now being supplemented by additional SRWS source control measures that encourage the retirement of existing SRWS systems to further reduce non-water supply chloride source loads. The projection analyses in the Staff Report, however, do not take these types of supplemental measures into account.

Second, the Staff Report reaches its conclusion that advanced treatment is necessary to obtain the chloride water quality objectives finding based in part on an overstatement of the influence of WRP discharges on chloride loading in the Santa Clara River. The Staff Report states that the SCV WRPs "contributed approximately 100% and 86% of the estimated total chloride load to the USCR." *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration, p. 9*. This estimate is misleading and incorrect without a complete chloride load balance provided to put these WRP load estimates in context. For instance, other chloride source loads to the USCR would include rising groundwater, tributaries and reservoir releases, and agriculture activities and discharges. Combined, these average loads would presumably greatly exceed the average instream chloride load at Blue Cut. Therefore the *actual* estimated percent contribution of WRP loads to total instream chloride loads (including all USCR sources) should be relied upon to determine the relative importance of controlling chloride sources in effluent via advanced treatment. The actual estimated percent contribution of WRP loads to instream loads would likely be substantially less than the 86-100% estimate considered in the Staff Report.

Third, the technical justification for adopting a TMDL revision to accelerate implementation of advanced treatment and brine line disposal is insufficient because it ignores existing data, or is based on an inaccurate or inadequate interpretation of existing data. For example, the finding ignores that existing data shows that at least the trend of increasing chloride concentrations has been halted. *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration*, p. 21. LACSD monitoring data also shows recent water quality improvements at the Blue Cut monitoring station and in groundwater in the Piru Basin. Further, United Water Conservation District's (UWCD's) recent report of chloride in the Piru Basin shows that existing water quality objectives are not being exceeded in the East Piru basin, and that groundwater chloride concentrations in Rancho Camulos wells have very recently dropped, probably due to recently observed low chloride levels in the SCR. *Chloride in the Piru Basin, Figure 1*. It is inappropriate to ignore recent data trends in considering the proposed revision to the TMDL.

Similarly, the finding that the TMDL implementation schedule needs to be accelerated relies in part upon the inaccurate premise that LACSD's 2002 Chloride Source Report finds that compliance with the chloride objective can only be achieved by 2050. *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration*, p. 12. In fact, this LACSD report indicates that, assuming all existing SRWS were removed from their system, all projected annual average effluent concentrations beyond the year 2010 would be below 97 mg/L. *Santa Clarita Valley Joint Sewerage System Chloride Source Report*, p. 5-7.

One last example of reliance upon an inaccurate premise arises from the presumption in the Staff Report that "growth within the SCV is accompanied by increasing demand for imported water and increasing chloride loads." *Santa Clarita Valley Joint Sewerage System Chloride Source Report*, p. 10. The premise is inappropriate because increased residential growth does not correspond to an increase in WRP effluent chloride concentrations, since new SRWS systems are no longer permitted as a result of District's prospective SRWS ban enacted in March 2003. Instead, increased residential flows will likely serve to dilute effluent chloride concentrations to some degree. Further, as the LACSD's outreach program, SRWS rebate/removal program, and legislative efforts target the existing SRWS systems for removal, WRP effluent chloride concentrations should be further reduced.

When all available existing data is considered and accurately interpreted, and inappropriate assumptions are removed, the Staff Report finding that advanced treatment must be accelerated is not supported.

Fourth, the technical justification for adoption of the proposed revision to the TMDL is insufficient because it does not take into account the potential assimilative capacity for chloride that the Santa Clara River appears to exhibit. While the chloride concentration gradient of 40 mg/L from Valencia to Blue Cut discussed in the Staff Report at page 12 potentially indicates some assimilative capacity for chloride,<sup>3</sup> the GSWI study mandated by the adopted TMDL is not yet completed. Until the GSWI study is complete, it will not be entirely clear what the assimilative capacity of the Santa Clara River is for chloride, and how that capacity should impact the implementation of the TMDL. The Staff Report makes clear the importance of the GSWI study in terms of structure of the TMDL by stating that this study will provide "critical information regarding the effects of growth on chloride levels in the UCSR and its underlying groundwater basin" and "will also provide information to determine the magnitude of load reductions and the need for advanced treatment to attain the chloride WQO." *Staff Report: Upper Santa Clara River Chloride TMDL Reconsideration*, p. 17-18. The Staff Report



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acknowledges that the typical chloride gradient between WRP outfall and the Blue Cut monitoring station is substantial (about 40 mg/L),<sup>4</sup> but then ignores that the completion of the GSWI study may support implementation of a SSO that takes into account both the River's assimilative capacity and the point of actual agricultural supply use, which well downstream of the WRP effluent discharges. Taking into account the typical concentration gradient acknowledged in the Staff Report and potential assimilative capacity of the River for chloride, LACSD estimates that, with source controls, compliance with the chloride water quality objectives can be attained 100% of the time in effluent in non-drought conditions, and compliance with the LRE concentration range can be achieved 100% of the time at Blue Cut, regardless of drought or non-drought conditions. These facts call into serious question the need to force advanced treatment and brine line disposal at this time, prior to completion of the relevant studies.

Fifth, the proposed revision lacks technical justification because the Staff Report fails to cite or set forth any reliable monitoring data showing that beneficial uses have been further impaired as dischargers have complied over the last two years with the current TMDL Implementation Plan. While Staff Report calculates predicted chloride loads during compliance with interim TMDL performance based standards, chloride loads were anticipated during the implementation period under the adopted TMDL, and were taken into account at the time that the current Implementation Plan and Waste Load Allocations were established. There is no indication that these current chloride loads substantially exceed the loads that were anticipated when adopting the TMDL, and there is no evidence that these loads are substantially degrading water quality or impacting the actual use (e.g., documentation of leaf tip burn or decrease yield or crop value by downstream avocado growers) during the implementation period. As a result, the proposed revision to accelerate implementation of advanced treatment and brine line disposal is premature, and is not warranted at this time.

**Alternative approach to addressing chloride.** Rather than moving forward with the accelerated Implementation Plan as currently proposed, we request that the Regional Board consider a regional salt management program that would bring together the various stakeholders in the watershed and work towards achieving compliance with the TMDL. The original Staff Report prepared in 2002 supports this type of watershed management approach for improving water quality with respect to chloride. The original Staff Report discusses the impacts of chloride that occur on a watershed basis and recommends that the stakeholders in the watershed should collaborate to engage in tasks that would support salt management on a regional scale. *Total Maximum Daily Load for Chloride in the Upper Santa Clara River Staff Report (2002)*, p. 8, 15-16. Watershed-wide issues require watershed-wide solutions, and a stakeholder driven watershed approach has the potential to create innovative solutions to achieve compliance with the TMDL.

In fact, there are several examples of stakeholder driven, regional pollutant management programs implemented under TMDLs that are achieving some success, including the Central Valley Regional Board's salinity management initiative, and the Santa Ana Regional Board's nitrogen and selenium management program. Within the LARWQCB's own jurisdiction, there is the Salts TMDL Work Plan for the Calleguas Creek Watershed, which contains action items such as implementation of regional source control management strategies and development of a watershed-wide water supply management plan. Within the Santa Clara River watershed, similar integrated, regional salt management solutions should be sought, lead by a stakeholder group that is responsible for collaboratively developing more mutually beneficial solutions for all stakeholders and the watershed as a whole.

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<sup>4</sup> Staff Report: *Upper Santa Clara River Chloride TMDL Reconsideration*, p. 66.

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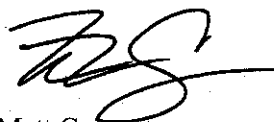
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**Conclusion.** While we recognize that elevated chloride concentrations in the Santa Clara River present a water quality concern, the proposed revision to the TMDL Implementation Plan is not a necessary, appropriate or effective approach to address Santa Clara chloride because it suffers from the two fundamental problems described above. We request that the Regional Board instead consider revising the TMDL to incorporate a component that explicitly supports development of a regional salt management approach to supplement existing implementation measures of the chloride TMDL in order to better attain water quality standards.

For these reasons, we respectfully request that the Regional Board maintain the current TMDL implementation measures and the current implementation schedule. In addition, we request that the Regional Board consider further addressing chloride concentrations in the Santa Clara River by creating milestones for implementation of a collaborative stakeholder process to develop a regional salt management approach, which would supplement the current implementation measures of the TMDL.

Thank you again for the opportunity to comment on this important issue. Please contact me at 661-255-4259 to discuss our comments or any address questions you may have.

Sincerely,  
NEWHALL LAND & FARMING COMPANY



Matt Carpenter  
Director, Environmental Resources

cc: Y. Chu  
J. Bishop  
M. Subbotin