

April 4, 2007

Ms. Tam M. Doduc, Chair
California State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Amendment to the Water Quality Control Plan for The Los Angeles Region
(Basin Plan) to Revise the Implementation Plan for the Upper Santa Clara River
Chloride Total Maximum Daily Load (TMDL)

Dear Ms. Doduc:

The Santa Clarita Water Division of the Castaic Lake Water Agency (SCWD) would like to thank the members of the State Water Resources Control Board (State Board) for this opportunity to provide comments on the amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to revise the Implementation Plan for the Upper Santa Clara River (USCR) chloride Total Maximum Daily Load (TMDL). The SCWD would also like to request that the comment period be extended given the complexity of issues related to this TMDL implementation plan.

The USCR chloride TMDL was adopted by the Los Angeles Regional Water Quality Control Board (Regional Board) in May 2004 and became effective in May 2005. In August 2006, the Regional Board adopted Order No. R4-2006-016, which shortened the implementation schedule of the TMDL from thirteen years to eleven years, thereby truncating the time originally allowed for conducting special scientific studies to determine the appropriate level of chloride for the Santa Clara River. The Santa Clarita Valley Sanitation District (SCVSD) has been conducting these special studies required by the USCR TMDL with stakeholders in accordance with the collaborative process plan. These special studies will provide the scientific facts necessary for determining appropriate water quality objectives for the Upper Santa Clara River, and the adequate time needed to properly complete these studies through the collaborative process. Reducing the implementation schedule and specifically the time allotted for completion of these studies would undermine the TMDL collaborative process, jeopardize the scientific integrity of these special studies, resulting in premature costs and potentially unnecessary advanced treatment at the SCVSD water reclamation plants.

In addition, the Regional Board's shortening of the implementation schedule would undermine current source control efforts, which are contributing to reductions in chloride levels in the river. The shortening of schedule places the SCVSD on a critical path to begin planning and design of costly advanced treatment facilities before these source control efforts can take effect.

Given the potential costs of advanced treatment facilities, it is essential that TMDL special scientific studies are completed and appropriate water quality objectives are determined. Opportunity must be given for source control efforts to continue to succeed and provide an environmentally sound, cost effective solution for the Santa Clarita community. Therefore, the

SCWD believes that the shortening of the TMDL implementation schedule is not warranted. The SCWD strongly urges the State Board to remand the Regional Board's Basin Plan Amendment to revise the Implementation Plan for the USCR chloride TMDL and allow for the special scientific studies to be conducted sequentially and within the time frame originally envisioned and approved by the State Board.

The SCWD understands the importance of protecting water quality in the Santa Clara River and believe that the actions by the Regional Board will not allow for the most environmentally friendly and cost effective solution to the chloride concern. The SCWD appreciates your consideration of these comments. If you have any questions or require further information, please contact me at (661) 259-2737.

Sincerely,

Mauricio E. Guardado, Jr.
Retail Manager