



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

## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400  
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998  
Telephone: (562) 699-7411, FAX: (562) 699-5422  
www.lacsd.org

STEPHEN R. MAGUIN  
Chief Engineer and General Manager

March 16, 2007  
File No. 31-370.40.4A

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

Dear Ms. Doduc:



### Upper Santa Clara River Chloride TMDL – Request for Comment Period Extension

On March 12, 2007, the Santa Clarita Valley Sanitation District of Los Angeles County (District) received notice of opportunity for public comment on the recent amendments to the time schedule for the Chloride TMDL on the Upper Santa Clara River. Comments are currently due by noon on April 4, 2007, which is a period of less than 30 days. At this point in time, no hearing has been scheduled.

Given the complexity of the issues related to this TMDL schedule and the interconnection between this TMDL and other watershed planning and TMDL activities, as well as the procedural irregularities in the TMDL amendment process that occurred at the Regional Board level, the District would like an extension of time to provide comments to the State Water Resources Control Board (State Board) and requests that the written comment deadline be extended to April 30, 2007. Since the State Board has not yet set a hearing date, it does not appear that extending the comment deadline would necessarily cause a delay in the State Board's ability to move forward in a timely manner to consider action on this TMDL. Moreover, notwithstanding different points of views among various interested parties about the amendments to the TMDL implementation schedule awaiting State Board approval, the implementation activities called for in the implementation plan are continuing to move forward as well.

As the primary entity taking, and providing funding for, compliance actions covered in this TMDL's implementation plan, the District needs additional time to provide comments to the State Board regarding the adverse impacts that the amendments to the TMDL are having, and will have in the future, on the District's compliance activities. The District believes that the additional time is warranted and authorized under Water Code section 13246(b)(1), because this is considered an "exceedingly complex TMDL" due to the number of interested parties that have commented in the past, the size of the administrative record, and the complex scientific studies currently underway as part of the implementation activities.

We look forward to hearing from you regarding this request for a revised comment deadline. If you have any questions or need further information, please contact the undersigned at (562) 908-4288, extension 2502.

Very truly yours,

Stephen R. Maguin

*Victoria O. Conway*  
Victoria O. Conway

Assistant Department Head  
Technical Services Department

VOC:drs

Cc: Song Her, Clerk to the Board