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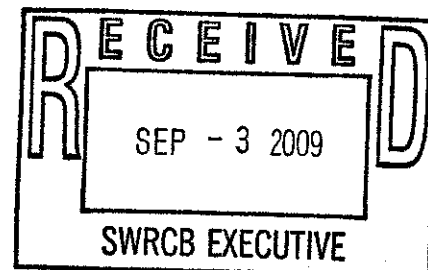
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UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

September 3, 2009



Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

RE: Comment Letter - Proposed Approval of an Amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to Adopt Conditional Site- Specific Objectives (SSOs) for Chloride and Revise the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL)

Dear Ms. Townsend:

In response to your notification dated July 29, 2009, United Water Conservation District appreciates the opportunity to comment on the proposed amendment to the Water Quality Control Plan for the Los Angeles Region to revise the Upper Santa Clara River Chloride TMDL and to adopt conditional site-specific objectives for chloride total maximum daily load. The subject amendment was adopted by the Los Angeles Regional Water Quality Control Board on December 11, 2008, in Ventura, California, under Resolution No. R4-2008-012.

United Water Conservation District ("United Water") is responsible for groundwater management in seven of the groundwater basins in Ventura County. As part of this responsibility, United Water had adopted a Groundwater Management Plan (under AB 3030) for the two groundwater basins just downstream from the Los Angeles County line along the Santa Clara River (the Piru and Fillmore basins). United Water has for years regularly monitored both surface and groundwater in these basins for flow, groundwater elevations, and water quality. As the result of this monitoring, United Water first raised the alarm on the degradation of groundwater quality that was occurring in the eastern portion of the Piru basin. United documented that this degradation was the direct result of the degraded water quality in the Santa Clara River as the result of discharges from the waste water treatment plants in adjacent Los Angeles County. These data have been instrumental in the long process of setting water quality standards and finding a solution to this degradation of groundwater.

After years of studies conducted on the water quality in the Santa Clara River corridor funded by the Los Angeles County Sanitation Districts, and significant acrimony on all sides of the issue, a watershed-wide group of organizations started working on a physical solution to the degradation problem. This collective effort from both Los Angeles and Ventura counties was lauded by both



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the Los Angeles Regional Water Quality Control Board and members of the State Board. The solution worked out by the parties, known as the Alternative Water Resources Management Plan (AWRM), requires significant future effort by agencies in both counties. It also helps solve a problem just starting to be addressed in California, the management of salts.

The physical solution for the salts problem is not inexpensive, as Ventura County has long known in the decades-long fight against seawater intrusion. Recently, the Santa Clarita Sanitation District Board of Directors and some of their constituents have questioned the expense of the salts solution and the increase in their sewer rates. United Water is familiar with these objections to increased sewer rates, having sat beside Jon Bishop (then Executive Officer of the LA Regional Board) and city staff during hearings on the large sewer rate increases that have been adopted by the cities of Fillmore and Santa Paula to fix water quality problems in their discharges to the Santa Clara River. Although United Water sympathizes with the public on any rate increases, the ratepayers of Santa Clarita can find solace in the fact that ratepayers in Fillmore and Santa Paula are paying higher rates than those proposed for Santa Clarita (even though those two Ventura County cities are among the poorest in the county). Fixing water quality problems is simply not cheap.

The other objection to the AWRM that we have heard from Santa Clarita politicians and residents is that Ventura County is somehow receiving a windfall from the proposed project. Although the AWRM will indeed help combat seawater intrusion, it will be accomplished by helping dispose of Santa Clarita's salts that had no other place to go. The alternative to United Water taking this water to combat seawater intrusion would have been the original plan - build a brine line to the ocean - that would have been more expensive than the AWRM and meant even higher sewer rates in Santa Clarita.

It should be noted that while the AWRM goes through its planning and regulatory stages, the groundwater of the Piru basin continues to degrade from the Los Angeles County discharges into the Santa Clara River. United Water has long warned that the degradation would not be limited to the eastern portion of the Piru basin (east of the confluence with Piru Creek), but would migrate downgradient towards the main part of the basin. That has now occurred, with groundwater degradation west of Piru Creek. Thus, time is of the essence in bringing the AWRM solution to fruition.

The Site-Specific Objectives (SSOs) for Chloride and revisions of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) are an integral part of implementing the AWRM. Thus, United Water requests that the State Water Resources Control Board approve the basin plan amendment necessary for implementation of the AWRM.

Sincerely,

E. Michael Solomon
General Manager