



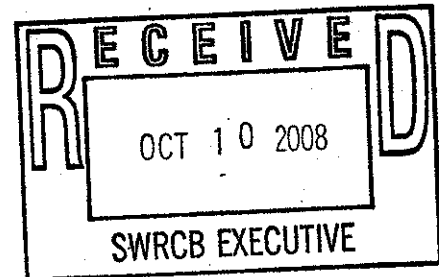
City of  
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October 9, 2008

Ms. Jeanine Townsend, Clerk to the Board  
California State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



Dear Ms. Townsend:

Subject: Comment Letter - Subdivision of Reach 4 of the Santa Clara River

The City of Santa Clara (City) would like to thank the members of the State Water Resources Control Board (State Board) for this opportunity to provide comments on the Los Angeles Regional Water Quality Control Board's (Regional Board) Resolution 2007-018. This Resolution amends the Water Quality Control Basin Plan for the Los Angeles Region (Basin Plan) by subdividing Reach 4 of the Santa Clara River into two separate reaches. The City has been a stakeholder within the Santa Clara River Watershed and an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process.

The City supports the Resolution because it better reflects the unique conditions in the Santa Clara River Watershed. This action is a key to implementing the Alternative Water Resources Management (AWRM) Program. The AWRM is an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since the Regional Board adopted Resolution 2007-018 on November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including the City, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration. The AWRM incorporates the following actions.

- Reduce chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light disinfection processes.
- Small-scale advanced treatment of wastewater with local brine disposal.
- Supplemental water to reduce chloride levels in the river.
- Alternative water supplies to protect salt-sensitive agriculture, when necessary.
- Facilities to remove high chloride groundwater in Ventura County from the watershed.



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The Regional Board will reconsider the Chloride TMDL, as well as, the adoption of site-specific objectives for chloride to implement the AWRM Program in December 2008.

Regional Board Resolution 2007-018, paired with the chloride site-specific objectives necessary to implement the AWRM Program, will allow the most environmentally-friendly and cost-effective solution to the Chloride TMDL.

The City supports this Resolution and urges the State Board to approve this important Basin Plan amendment. If you have any questions or require further information, please contact Heather Merenda, Sustainability Planner, at (661) 284-1413 or [hmerenda@santa-clarita.com](mailto:hmerenda@santa-clarita.com).

Sincerely,



Travis Lange  
Environmental Services Division Manager

TL:HM:kms

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cc: Robert Newman, Public Works Director  
Brian Louie, Santa Clarita Valley Sanitation District of  
Los Angeles County