



March 28, 2007

Ms. Song Her
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Re: Comment Letter – Upper Santa Clara River Chloride TMDL

Dear Ms. Her:

The Castaic Lake Water Agency (CLWA) has reviewed the proposed Basin Plan amendment that revises the Implementation Plan for the Upper Santa Clara River Chloride TMDL (Implementation Plan) and submits these comments for your consideration. The proposed changes to the Implementation Plan would (1) accelerate the schedule by two years from 2017 to 2015 for compliance with the 100 mg/l chloride water quality objective and (2) add implementation milestones for TMDL planning.

CLWA would instead urge that the State Board continue on the current schedule for meeting the chloride water quality objective. Full understanding of both the impacts and the sources of chlorides in the relevant reaches of the Santa Clara River has yet to be determined. The collaborative process that has been established between the stakeholders needs more time to complete studies to analyze agricultural impacts and model the hydrological and chemical processes that govern chloride concentrations in the Santa Clara River at the relevant locations. Efforts currently underway in the upper basin to reduce the level of chloride in treated wastewater effluent have shown consistent progress. Additional time is needed to determine if the reduction in chloride can continue to the point that the effluent will be low enough in chlorides to meet the water quality objective without capital intensive retrofits to existing water reclamation plants.

The additional two years permitted by the existing TMDL implementation schedule are critical to determine if any form of advanced treatment is really necessary to meet the water quality objectives and to avoid any serious economic or environmental harm. Given the potential cost to ratepayers of advanced treatment, assuredness is a prerequisite for such a retrofit of the water reclamation plants.

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CLWA appreciates consideration of these comments. If you have any questions or comments, please call Jeff Ford, Water Resources Planner, or me at (661) 297-1600.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Masnada". The signature is fluid and cursive, with a large initial "D" and "M".

Dan Masnada
General Manager

cc: CLWA Board of Directors
Steve Cole, Newhall County Water District