



NEWHALL COUNTY WATER DISTRICT

23780 North Pine Street • P.O. Box 220970 • Santa Clarita, CA 91322-0970
 (661) 259-3610 Phone • (661) 259-9673 Fax • email: mail@ncwd.org

Directors: RANDALL D. FFIESTER, *President* MARIA GUTZEIT, *Vice President* B. J. ATKINS BARBARA DORÉ LYNNE A. PLAMBECK

4/18/07 BdMtg Item 7
 Upper Santa Clara River
 Deadline: 4/4/07 noon

April 2, 2007

State Water Resources Control Board
 1001 I Street
 Sacramento, CA 95814
 Attn: Song Her, Clerk to the Board

Re: **Comment Letter – Upper Santa Clara River Chloride TMDL**

Dear Board Members:

Thank you for the opportunity to comment on the Basin Plan amendment that revises the Implementation Plan for the Upper Santa Clara River Chloride TMDL. State Water Resources Water Quality Control Board Staff will be recommending the following two items at the Board Meeting scheduled for April 18, 2007:

1. Approval of the amendment to the Basin Plan adopted under Los Angeles Water Board Resolution No. R4-2006-016.
2. Authorize the Executive Director or designee to submit the amendment adopted under Los Angeles Water Board Resolution No R4-2006-016 to Office of Administrative Law for concurrence on its non-regulatory and regulatory status and to the U.S. Environmental Protection Agency for informational purposes.

Newhall County Water District (NCWD) believes that it is premature to change the implementation schedule prior to the completion of studies to analyze agricultural impacts and model the hydrological and chemical processes that govern chloride concentrations in the Santa Clara River. These studies are being conducted as part of the Upper Santa Clara River Chloride Collaborative Process (Collaborative Process). NCWD has played an active role in the Collaborative Process and has found it to be a valuable venue for all stakeholders to provide input. The completion of the studies should provide a sound foundation for determining the appropriate standards for chloride in the Santa Clara River.

NCWD is specifically concerned that the outcome of the chloride TMDL could adversely impact the ability to undertake important local water supply projects including water recycling and aquifer recharge, all of which are important to providing reliable water service in Southern California. NCWD shares the staff's eagerness for a timely resolution to the chloride issue, but believes valuable information still needs to be collected prior to developing the overall solution. The additional two years permitted by the existing TMDL schedule are critical to provide for a thorough evaluation of compliance strategies.



Upper Santa Clara River

NCWD is proud to play an active role in the Collaborative Process and looks forward to continuing this cooperative effort with the stakeholders. Thank you again for the opportunity to provide comments on the Staff Report and if you have any questions regarding this information, please do not hesitate to contact me at (661) 259-3610.

Sincerely,

NEWHALL COUNTY WATER DISTRICT



Stephen L. Cole
General Manager

cc: NCWD Board of Directors
Dan Masnada, Castaic Lake Water Agency