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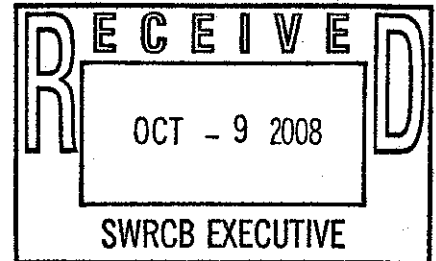
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UNITED WATER CONSERVATION DISTRICT

"Conserving Water Since 1927"

October 9, 2008



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

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

Dear Ms. Townsend:

United Water Conservation District would like to thank the State Water Resources Control Board for this opportunity to provide comments on Los Angeles Regional Water Quality Control Board Resolution No. 2007-018, which amends the Water Quality Control Plan for the Los Angeles Region by subdividing Reach 4 of the Santa Clara River into two separate reaches. Our agency is charged with protecting and enhancing the groundwater resources of the Santa Clara River Valley from the Los Angeles-Ventura County line to the ocean. As a stakeholder within the Santa Clara River Watershed, we have been an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process.

United Water Conservation District supports Regional Board Resolution No. 2007-018 because it better reflects the unique hydro-geologic conditions in this stretch of the River and would facilitate the implementation of the Alternative Water Resources Management (AWRM) Program, an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since the Regional Board adopted Resolution No. 2007-018 on November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including United, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration. The AWRM Program is a watershed-based approach to manage chloride in Santa Clara River and underlying groundwater basins and involves: (1) reducing chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light disinfection processes; (2) small-scale advanced treatment of wastewater with local brine disposal; (3) supplemental water to reduce chloride levels in the river; (4) alternative water supplies to protect salt-sensitive agriculture, when necessary; and (5) facilities to remove high chloride groundwater in Ventura County from the watershed. The Regional Board is expected to reconsider the Chloride TMDL as well as the



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adoption of site-specific objectives for chloride to implement the AWRM Program in December 2008.

United Water Conservation District believes that Regional Board Resolution No. 2007-018, and the resultant chloride site-specific objectives necessary to implement the AWRM Program, will allow for the most environmentally friendly and cost effective solution to the Chloride TMDL. Therefore, United Water Conservation District supports Resolution 2007-018 and urges the State Board to approve this important Basin Plan amendment. If you have any questions or require further information, please contact me at (805) 525-4431.

Sincerely,

E. Michael Solomon / KAS

E. Michael Solomon
General Manager