

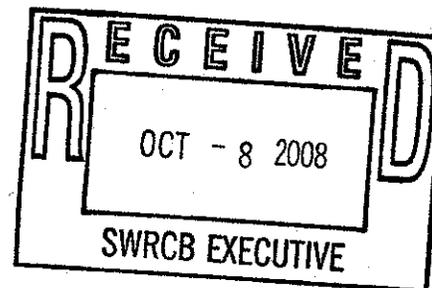


## COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

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STEPHEN R. MAGUIN  
Chief Engineer and General Manager

October 7, 2008  
File No. 31-370-40.4A



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

Dear Ms. Townsend:

### Comment Letter - Subdivision of Reach 4 of the Santa Clara River

The Santa Clarita Valley Sanitation District of Los Angeles County (District) would like to thank the members of the State Water Resources Control Board (State Board) for this opportunity to provide comments on Los Angeles Regional Water Quality Control Board (Regional Board) Resolution No. 2007-018, which amends the Water Quality Control Plan for the Los Angeles Region (Basin Plan) by subdividing Reach 4 of the Santa Clara River into two separate reaches. The District provides wastewater treatment services for the City of Santa Clarita and unincorporated areas of Los Angeles County in the Santa Clarita Valley, and its water reclamation plants discharge tertiary treated recycled water to the Upper Santa Clara River. As a stakeholder within the Santa Clara River Watershed, the District has been an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process.

The 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 has adopted Resolution No. 2007-018 on November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including the District, 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 will reconsider the Chloride TMDL as well as the adoption of site-specific objectives for chloride to implement the AWRM Program in December 2008.

The 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

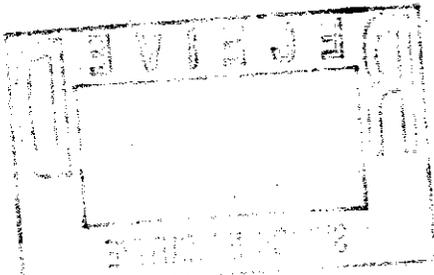
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environmentally friendly and cost effective solution to the Chloride TMDL. Therefore, the District supports Resolution 2007-018 and urges the State Board to approve this important Basin Plan amendment. The District appreciates your consideration of these comments. If you have any questions or require further information, please contact Brian Louie at extension 2802.



PLF:BL:nm

Very truly yours,

Stephen R. Maguin

Philip L. Friess  
Department Head  
Technical Services Department