

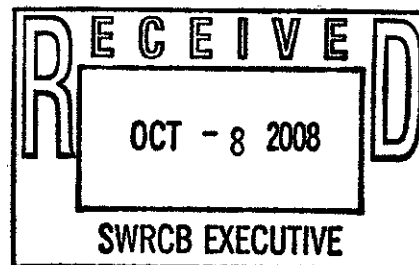


Valencia Water Company

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October 8, 2008

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



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

Dear Ms. Townsend,

Valencia Water Company 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. Valencia Water Company is a public water utility regulated by the California Public Utilities Commission, and serves over 100,000 residents in the Santa Clarita Valley in the county of Los Angeles. As a stakeholder within the Santa Clara River Watershed, Valencia Water Company has been an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process.

Valencia Water Company 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 Valencia Water Company, 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:

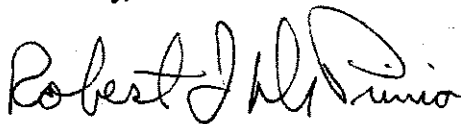
- (1) Reducing chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light disinfection processes;

- (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.

Valencia Water Company is also exploring an innovative treatment technology to soften local groundwater at the source. This project is aimed at enhancing local source control measures by improving the quality of potable water thereby encouraging customers to remove their automatic water softeners. These point-of-use water softening devices are a major contributor of chlorides discharged to the Santa Clara River. Start-up of the Groundwater Softening Demonstration Project began in September of this year, and work is underway to evaluate consumer acceptability and cost of producing the softened water.

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. Valencia Water Company 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, Valencia Water Company supports Resolution 2007-018 and urges the State Board to approve this important Basin Plan amendment. We appreciate your consideration of these comments. If you have any questions or require further information, please feel free to call me at (661) 295-6501.

Sincerely,



Robert J. DiPrimio
President

RJD/cv