

March 22, 2007

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



**RE: Comment Letter - Upper Santa Clara River Chloride TMDL**

I am writing to show support for the Regional Board's revised TMDL Plan and for the State Board's staff recommendation to the State Board to adopt this proposed amendment. I have been employed in the Agricultural finance field for 26 years with 17 years specifically in Ventura County.

The growers and their related partners may only appear to be in the background of the on-going technical studies, policy-making, and politics. But we are, and will be, the ones who have to live with the consequences and decisions made by others. While we benefit from the Santa Clara River, we also inevitably suffer from its degradation or permanent damage.

The Santa Clara River is the lifeblood of our heritage and our livelihoods. As river water quality deteriorates, we growers will become the unnecessary victims of a problem. It is time to act. The longer we wait, the more damage will be done and we already have direct experience with damage.

Whereas, land values have not declined; the loanable equity or return on assets has declined from reduced farm repayment ability. Existing and increasing salt concentrations from the Upper Santa Clara has shown up in reduced yields for the Chloride sensitive crops of avocados, strawberries, nursery, and various vegetables. The additional expense of mitigating the affects of the Chloride levels will become prohibited by normal farming operations. As a former director of United Water District, I am familiar with the serious concerns in that the Piru basin can not be reclaimed of these high concentrations if allowed to continue for ANY length of time. Damage is becoming permanent.

For these reasons, I support the staff recommendations to: (1) approve the Basin Plan amendment unanimously adopted by the Los Angeles Regional Board on August 3, 2006, Resolution No. R4-2006-016; and (2) authorize the Executive Director to submit the amendment to the Office of Administrative Law and to U.S. Environmental Protection Agency. I can be reached at 805-477-1020 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Patrick J. Kelley'. The signature is written in a cursive style with a long horizontal stroke at the end.

Patrick J. Kelley  
Vice President  
Farm Credit West

home: 6914 Heron Street  
Ventura, CA 93003