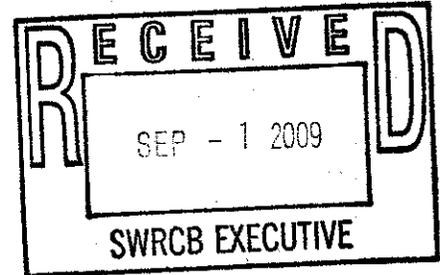


Ventura County Agricultural Water Quality Coalition
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September 1, 2009

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

RE: Comment Letter – Proposed Approval of an Amendment to the Water Quality Control Plan for the Los Angeles Region (Basin Plan) to Adopt Conditional Site- Specific Objectives (SSOs) for Chloride and Revise the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL)

Dear Ms. Townsend:

In response to your notification dated July 29, 2009, the Ventura County Agricultural Water Quality Coalition (hereafter "Water Coalition") appreciates the opportunity to comment on the proposed amendment to the Water Quality Control Plan for the Los Angeles Region to revise the Upper Santa Clara River Chloride TMDL and to adopt conditional site-specific objectives for chloride total maximum daily load. The subject amendment was adopted by the Los Angeles Regional Water Quality Control Board on December 11, 2008, in Ventura, California, under Resolution No. R4-2008-012.

The Water Coalition is a diverse group of local agricultural, business and related organizations which joined together in 2004 to participate in the Regional Board's Chloride TMDL Implementation Plan public process. At the time, little was known about the Chloride Implementation Plan, including its potential impact upon Ventura County interests, especially the local agricultural industry. Many of the industry's stakeholders have farming operations along the Upper Santa Clara River that would be directly impacted by the Implementation Plan. The Coalition was formed to give all of these stakeholders the opportunity to be heard before the Regional Board, and ultimately before the State Board. The Coalition has participated in virtually all of the 38 stakeholder meetings of the Technical Working Group established under the Implementation Plan. It has also participated and given testimony a number of times before the Regional Board and has appeared before this Board. The Coalition is also a party to

Coalition Members:

- Ventura County Agricultural Assn.
- Ventura County Farm Bureau
- Western Growers
- California Avocado Commission
- California Strawberry Commission
- Ventura County Economic Development Association
- Association of Water Agencies of Ventura County
- United Water Conservation District
- A.A. Naumann, Inc.
- Camulos Ranch Company
- Oxnard Lemon Company
- Somis Pacific Agricultural Mgmt.
- Saticoy Lemon Association
- Limoneira
- Ventura Pacific Company
- Calavo Growers
- Sunrise Growers
- Catalinos Berry Farms
- D.W. Berry Farms
- Iwamoto-Gean Strawberry Farms
- Anacapa Berry Farms
- Westview Berry Farms
- Pacifico Berry Farms
- Mugu Ranch Partnership
- Conroy Farms
- Mandalay Berry Farms
- Pac-Man General Partnership
- Montalvo Farms
- Festival Farms
- Gull Island Farms
- Dullam Nursery

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the Memorandum of Understanding, an agreement executed by all of the major stakeholders pursuant to the Alternative Water Resources Management Plan (AWRM) now before the Board. This collaborative and innovative plan, developed by the stakeholders to address water-supply and water-quality needs throughout the entire watershed, will make it possible for dischargers to comply with the Upper Santa Clara River Chloride TMDL at a substantially reduced cost, while, at the same time, providing numerous other important water-quality benefits to the watershed community.

The AWRM, which has been in the process of development since November 2007, is a watershed-based approach to managing chloride discharges in the Upper Santa Clara River and underlying groundwater basins. The intended goal of the AWRM is to provide, *inter alia*, (1) a reduction in chloride levels in recycled water through automatic water softener removal and conversion to ultraviolet disinfection for wastewater treatment; (2) construction of a small-scale (MGD MFRO) advanced treatment facility of wastewater and local brine disposal; (3) introduction of supplemental water to reduce chloride levels in the Santa Clara River; (4) the provision of alternative water supplies to protect chloride-sensitive agriculture, when necessary; and (5) construction of a well field to remove high-chloride groundwater in Ventura County from the watershed.

The foregoing components have been vetted by the stakeholders to the AWRM process and resulted in a Memorandum of Understanding detailing the various obligations of each of the stakeholders for compliance with the goals set forth in the AWRM. This process was completed when the Los Angeles Regional Water Quality Control Board issued a unanimous decision on December 11, 2008, adopting the AWRM as an alternative means to accomplishing the goals set forth in the Chloride TMDL Implementation Plan.

The Coalition wholeheartedly believes and is convinced that the facilities and management strategies developed in the AWRM plan will adequately protect chloride-sensitive crops in the lower Santa Clara River Valley, while also improving the quality and reliability of Ventura County's water supply. That is why the Farm Bureau of Ventura County, and the Ventura County Agricultural Association, the founding members of the Water Coalition, have endorsed the Memorandum of Understanding signed by the various stakeholders, to move this process forward.

Of course, the Water Coalition is not unmindful of limited opposition that has recently arisen among many of the utility ratepayers in the Santa Clarita Valley whose monthly water bills will be increased moderately to finance the construction of the facilities required to carry out the AWRM. Similarly, however, this Board's adoption of the AWRM will likely result in an almost 50% reduction in the cost of the original Chloride TMDL Implementation Plan, Alternative No. 1. While the Water Coalition sympathizes with the concerns of some of these ratepayers, ultimately, as the downstream beneficial users of this effluent water, the downstream stakeholders look to this Board for effective enforcement of the State's Anti-Degradation policy and related protections of beneficial users of the State's Porter-Cologne Act.

As the Farm Bureau of Ventura County has pointed out in a companion comment letter in support of the AWRM, many agricultural landowners in Ventura County are also spending a great deal of money to address water-quality impairments caused by their own farming operations. In addition,

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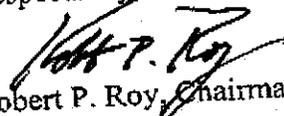
urban residents in Ventura County communities such as Fillmore and Santa Paula, who discharge treated wastewater into the Santa Clara River have also agreed to pay dramatically higher utility bills in order to mitigate the chloride contamination for which they are responsible. Thus, Ventura County residents are doing their part to clean up the Santa Clara River and they welcome the participation of their upstream neighbors in Los Angeles County in this effort to address an issue of regional concern.

The Water Coalition would also like to take this opportunity to commend many of the stakeholders, in particular, the current leadership of the negotiation team for the Santa Clarita Valley Sanitation Districts of Los Angeles County, and many of the upper basin water purveyors, for making this innovative and collaborative approach to water quality improvement a reality.

Lastly, we would be remiss in failing to commend the outstanding efforts of the staff of the Los Angeles Regional Water Quality Board assigned to this difficult TMDL process. Both the staff and Board members have been unyielding in their commitment to achieving the water quality objectives while allowing sufficient creativity to make this collaborative approach a reality.

For all of the foregoing reasons, the Ventura County Agricultural Water Quality Coalition respectfully requests that the State Water Resources Control Board approve the basin plan amendment necessary for implementation of the AWRM.

Respectfully,


Robert P. Roy, Chairman