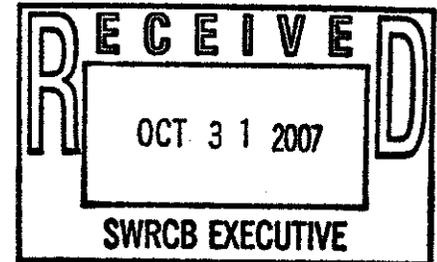




November 1, 2007

Jeanine Townsend
Acting Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



RE: Comment Letter – Revolon Slough and Beardsley Wash and Ventura River Estuary
Trash TMDL

Dear Ms Townsend:

The Farm Bureau of Ventura County (Farm Bureau) appreciates the opportunity to provide comments on the *Amendments to the Water Quality Control Plan – Los Angeles Region for the Revolon Slough and Beardsley Wash Trash TMDL Basin Plan Amendments* and *Amendments to the Water Quality Control Plan – Los Angeles Region for the Ventura River Estuary Trash TMDL Basin Plan Amendments*.

As stakeholders in the two watersheds, we have been actively working with other stakeholders to develop TMDL implementation programs that cooperatively address sources of pollution throughout Ventura County. We are writing this comment letter to provide support for the components of the TMDL that provide a mechanism for reducing trash discharges and also maintain the ability of the stakeholders in the watershed to coordinate and effectively implement the TMDLs.

The trash TMDLs include a mechanism of compliance for nonpoint sources called the Minimum Frequency of Assessment and Collection (MFAC)/ Best Management Practice (BMP) program. That program requires responsible parties to install BMPs and conduct regular trash pick ups in the drains discharging to the waterbody and in the waterbody itself to reduce the amount of trash in the waterbody. As a nonpoint source in the TMDLs, the only mechanism of compliance for agriculture is through the MFAC/BMP program.

As the TMDL is currently written, the MFAC/BMP program is also a responsibility of other entities in the watershed, such as cities and Ventura County. We want to support the ability of these other entities to comply with the trash TMDL by using a MFAC/BMP program whether they are a point or a nonpoint source. If their ability to comply with the TMDL using the MFAC/BMP program is diminished, cities will be less inclined to spend their money working with agriculture to develop a comprehensive program and will

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instead focus on cleaning up their discharges with structural BMPs and doing a minimal MFAC/BMP program in the vicinity of their discharges. If this occurs, agriculture could end up with a larger responsibility for meeting the MFAC/BMP requirements. The cities and county should have the flexibility to work with other stakeholders to develop a comprehensive program that solves the trash problem. As representatives of the agricultural community, we wish to continue our cooperative relationship with other agencies in the County and not be limited in our ability to continue working with other agencies due to their implementation requirements as both point and nonpoint sources. Based on conversations with other agencies in the watersheds, it is our understanding that additional language will be proposed by the Regional Board that clarifies the mechanisms for compliance in the TMDL. We understand that the language changes will help address some of the concerns expressed by the other agencies and facilitate coordination of implementation programs. We urge the State Board to accept the language changes. In summary, we would like to provide support for the MFAC/BMP approach in the BPA as a mechanism for addressing trash in waterbodies without significant urban influences. Additionally, we support the adoption of the BPAs, including the language clarifications if proposed. We appreciate the State Board's consideration of the comments presented in this comment letter.

Sincerely,

Rex Laird

Rex Laird
CEO

cc: Farm Bureau of Ventura County Board of Directors
Ventura County Agricultural Irrigated Lands Group Steering Committee