

Coalition Members:

Ventura County Agricultural Assn.

Ventura County Farm Bureau

Western Growers

California Avocado Commission

California Strawberry Commission

Ventura County Economic  
Development AssociationAssociation of Water Agencies  
of Ventura County

United Water Conservation District

Supervisor John Flynn, 5<sup>th</sup> District -  
Ventura County

A.A. Naumann, Inc.

Camulos Ranch Company

Oxnard Lemon Company

Somis Pacific Agricultural Mgmt.

Saticoy Lemon Association

Limoncira

Ventura Pacific Company

Calavo Growers

Sunrise Growers

Catalinos Berry Farms

D.W. Berry Farms

Iwanoto-Gean Strawberry Farms

Anacapa Berry Farms

Westview Berry Farms

Pacífico 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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March 27, 2007

Song Her, Clerk of the Board  
 State Water Resources Control Board  
 1001 I Street  
 Sacramento, California 95814

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

The Ventura County Agricultural Water Quality Coalition (Coalition) is writing this letter to reaffirm our position and to show support for the Los Angeles Regional Water Quality Control Board's unanimously adopted amendments to the Upper Santa Clara River Chloride TMDL Implementation Plan.

The elevated chloride content in the Upper Santa Clara River has brought grave concerns to the agricultural community in Ventura County and prompted the formation of this Coalition. The key players in the agricultural community county-wide have come together to make our voices heard. With strawberries, nursery stock, lemons, and avocados as the County's top commodities, our agricultural industry is undoubtedly a chloride-sensitive one.

Developing a TMDL is a lengthy and complicated process involving different stakeholders with diverse points of view. That we understand. However, we believe the issue is clear, the data are compelling and the time to act is now. The Coalition is frustrated with the "we need more time" reasoning of the Los Angeles County Sanitation Districts. With every passing day, more chloride is discharged into one of the ten most "endangered" rivers in the United States, affecting downstream beneficial users, like agriculture.

The Literature Review Evaluation of salt-sensitive crop chloride thresholds concluded a couple of years ago that chloride levels above 100 -117 mg/l can compromise yields and/or impair fruit quality. With the current chloride levels well above 100 mg/L in the River, our growers are actually not "theoretically" experiencing the impact. We have specific cases of growers suffering crop yield declines while irrigating with chloride-laden water. We need to move into more immediate solutions to the problem and away from continued studies.

The recommendations of the Los Angeles Regional Water Quality Control Board and the State Board staff's recommendation to approve the amendments will provide the necessary steps to protect the agricultural beneficial uses that are so important to our region, our economy and our heritage. We strongly support their recommendations. Specifically, the addition of two new tasks under the Implementation of Compliance Measures will set attainable milestones for the Sanitation Districts to adhere within a reasonable and attainable time line that has been compressed from 13 years to 11 years. Without these amendments to the Chloride TMDL Implementation Plan, excessive chloride discharges will continue unabated thereby adversely affecting downstream beneficial uses.

For these reasons, the Coalition strongly supports the State Board Staff's recommendations to: (1) approve the Basin Plan Amendment adopted by the Los Angeles Water Board Resolution No. R4-2006-016; and (2) authorize the Executive Director or designee to submit the amendment adopted under Los Angeles Water Board Resolution No. R4-2006-016 to the Office of Administrative Law for concurrence on its non-regulatory and regulatory status and to the U.S. Environmental Protection Agency for informational purposes.

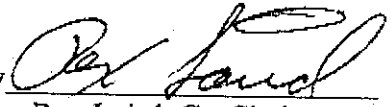
Respectfully submitted,

By

  
Robert P. Roy, Co-Chair

Respectfully submitted,

By

  
Rex Laird, Co-Chair

RPR/lc

Sent Via Facsimile: (916) 341-5620