

4/18/07 BdMtg Item __ Upper Santa Clara River Deadline: 4/4/07 noon

March 27, 2007

State Water Resources Control Board 1001 | Street Sacramento, CA 95814



RE: Comment Letter - Upper Santa Clara River Chloride TMDL

In regards to the revision of the Implementation Plan for the Upper Santa Clara River (USCR) Chloride TMDL, the California Avocado Commission (CAC) would like to express support for the Los Angeles Regional Water Quality Control Board's proposed amendments.

The CAC represents 6,500 avocado growers that produce approximately 90 percent of the United States annual avocado crop. At a harvested acreage of 19,000 acres, Ventura County alone produces the largest avocado crop in California second to only San Diego. Ventura County's avocado production values ranked fourth in 2004 and sixth in 2005 at \$124.7 million and \$54.8 million, respectively.

Water is vital to the production of avocados. For this reason, the CAC has created the Southern California Agricultural Water Team (SCAWT). These specialists assist growers in Southern California to better understand water supply and quality issues. Both CAC and SCAWT have been carefully following the development of the USCR Chloride TMDL process from the beginning.

Surface water diverted from the Santa Clara River and ground water supply are currently the primary sources of water for avocado growers in the Santa Clarita Valley. Degradation of the Santa Clara River water quality will also lead to degradation of groundwater underlying the region. This poses major concerns to growers in the area including many members of the CAC. High salt content in irrigation water represents a significant obstacle to viable avocado production as well as other crops grown in the region (e.g. strawberries, lemons, and nursery crops). These are all salt-sensitive crops and represent the County's leading multi-million dollar value commodities.

The change in the TMDL Implementation Plan to include milestones and compliance measures, to accelerate the TMDL schedule, to shorten the timeline for the remaining studies, and to construct facilities for advanced wastewater treatment will be a significant step forward to achieving an acceptable WQO and TMDL of 100 mg/L. (The Literature Review Evaluation task of this TMDL process clearly concluded that for avocados "the best estimate of a CI hazard concentration ranges from 100 to 117 mg/L".)

Consequently, on the behalf of avocado growers in Ventura County, especially those in the Santa Clarita Valley, the CAC urges the State Board take the right action and approve the proposed amendment.

If you have any questions, please contact me at 949-341-1955 ext. 111.

Sincerely,

Tom Bellamore

Senior VP & Corporate Counsel