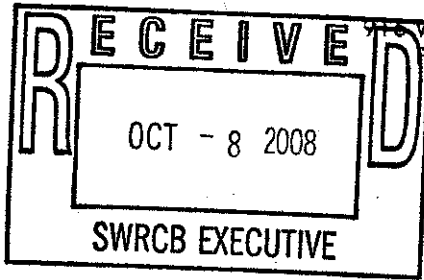


Ventura County Agricultural Association



9750 VENTURA BLVD., CAMARILLO, CALIFORNIA 93010
PHONE (805) 388-2727 • FAX (805) 388-2767

October 8, 2008

Ms. Jeanine Townsend, Clerk to the Board
California State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Sent Via Facsimile: (916) 341-5620

Subject: Comment Letter – Subdivision of Reach 4 of the Santa Clara River

Dear Ms. Townsend:

Ventura County Agricultural Association (“Association”) would like to thank the members of the State Water Resources Control Board (State Board) for this opportunity to provide comments on Los Angeles Regional Water Quality Control Board (Regional Board) Resolution No. 2007-018, which amends the Water Quality Control Plan for the Los Angeles Region (Basin Plan) by subdividing Reach 4 of the Santa Clara River into two separate reaches. As a stakeholder within the Santa Clara River Watershed, the Association has been an active member of the Upper Santa Clara River Chloride Total Maximum Daily Load (TMDL) Collaborative Process.

The Association supports Regional Board Resolution No. 2007-018 because it better reflects the unique hydro-geologic conditions in this stretch of the River and would facilitate the implementation of the Alternative Water Resources Management (AWRM) Program, an innovative watershed-wide and stakeholder-supported program to comply with the Upper Santa Clara River Chloride TMDL. Since the Regional Board has adopted Resolution No. 2007-018 on November 1, 2007, various Los Angeles and Ventura County stakeholders within the Santa Clara River watershed, including the Association, have worked together to develop the AWRM Program as a viable alternative for Regional Board consideration. The AWRM Program is a watershed-based approach to manage chloride in Santa Clara River and underlying groundwater basins and involves: (1) reducing chloride levels in recycled water through automatic water softener removals and conversion to ultraviolet light disinfection processes; (2) small-scale advanced treatment of wastewater with local brine disposal; (3) supplemental water to reduce chloride levels in the river; (4) alternative water supplies to protect salt-sensitive agriculture, when necessary; and (5) facilities to remove high chloride groundwater in Ventura County from the watershed. The Regional Board will reconsider the Chloride TMDL as well as the adoption of site-specific objectives for chloride to implement the AWRM Program in December 2008.

The Association believes that Regional Board Resolution No. 2007-018, and the resultant chloride site-specific objectives necessary to implement the AWRM Program, will allow for the most environmentally friendly and cost effective solution to the Chloride TMDL. Therefore, Ventura County Agricultural Association supports Resolution 2007-018 and urges the State Board to approve this important Basin Plan amendment. The Association appreciates your consideration

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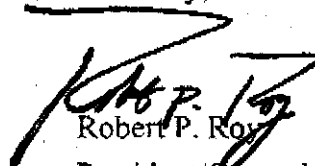
SWRCB

October 8, 2008

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of these comments. If you have any questions or require further information, please contact Robert P. Roy, President/General Counsel at (805) 388-2727.

Sincerely,

A handwritten signature in black ink, appearing to read "R. P. Roy", written over a horizontal line.

Robert P. Roy
President/General Counsel

RPR/le