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Aug. 31, 2009

Dorothy Rice, Executive Director
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

SUBJECT: 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. Rice,

Thank you for this 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 adopt conditional site-specific objectives for chloride. The amendment was adopted by the Los Angeles Regional Water Quality Control Board on Dec. 11, 2008, under Resolution No. R4-2008-012.

As an organization representing the interests of Ventura County's \$2.1-billion-a-year agricultural industry, the Farm Bureau of Ventura County supports the amendment, which is necessary to allow implementation of the Alternative Water Resources Management Plan (AWRM). This innovative plan, developed by stakeholders to address multiple water-supply and water-quality needs throughout the watershed, will make it possible for dischargers to comply with the Upper Santa Clara River chloride TMDL at the most reasonable cost while also providing a host of other important water-quality benefits in our community.

The AWRM, which stakeholders have been developing since Nov. 1, 2007, is a watershed-based approach to managing chloride in Santa Clara River and underlying groundwater basins. It involves: (1) reducing chloride levels in recycled water through automatic water softener removal and conversion to ultraviolet light disinfection ; (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.

We are convinced that the facilities and management strategies described by the plan will adequately protect salt-sensitive crops in the lower Santa Clara River Valley, while also improving the quality and reliability of Ventura County's water supply. That's why the

Farm Bureau, as a founding member of the Ventura County Agricultural Water Quality Coalition, endorsed the Memorandum of Understanding signed by various stakeholders, specifying the steps that will be taken to implement the AWRM.

We are aware that opposition has arisen among utility ratepayers in the Santa Clarita Valley whose water-treatment bills must increase to finance construction of the facilities required to carry out the AWRM. It is likely that many of them will make their objections known during the comment period on this proposed Basin Plan amendment and at any future hearing before the State Board. Although we sympathize with those residents, we wish to emphasize that moral and legal responsibility for mitigating the chloride contamination currently harming crops and compromising groundwater quality in Ventura County properly rests with the dischargers — not the victims of that contamination.

We would also point out that agricultural landowners in Ventura County are spending a great deal of money to address water-quality impairments caused by their own farming operations. In addition, urban residents in Ventura County communities that discharge treated wastewater into the Santa Clara River also have agreed to pay dramatically higher utility bills to mitigate the chloride contamination for which they are responsible. In other words, Ventura County residents are doing their part to clean up the Santa Clara River, and we welcome the participation of our upstream neighbors in Los Angeles County in this effort to address an issue of regional concern.

As a committed supporter of the AWRM, the Farm Bureau of Ventura County urges the State Water Resources Control Board to approve the Basin Plan amendment necessary for the program's implementation. We commend our fellow stakeholders, particularly the current leadership of the negotiating team for the Santa Clarita Valley Sanitation District of Los Angeles County, for helping make possible this groundbreaking approach to water-quality improvement.

I appreciate your consideration of these comments. If you have any questions, please contact me at 805-289-0155.

Sincerely,

A handwritten signature in black ink that reads "John Krist". The signature is written in a cursive, flowing style.

John Krist
Chief executive officer