



Ventura County Coalition of Labor, Agriculture and Business

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Los Angeles Regional Water Quality Control Board (LARWQCB)
Att. Shirley Birosik
320 W. Fourth St., Suite 200
Los Angeles, CA 90013
Via email: sbirosik@waterboards.ca.gov

RE: Comments: Ventura River Draft MOA Framework

Ventura County COLAB appreciates the opportunity to comment to the Los Angeles Regional Water Quality Control Board with respect to the Ventura River Draft MOA Framework. VC COLAB has 300 members including cattle ranchers, horse owners and irrigated agricultural landowners, many within the Ventura River watershed. We believe this is an important issue that needs to be addressed in a practical manner with thorough, unbiased scientific and engineering studies to reach a solution that will benefit not only the river and the steelhead, but also the community that surrounds the river. With statewide financial resources being stretched to the limit, it is important that we spend our dollars wisely and do not impact the economic viability of farming, water distribution and sanitation unnecessarily. Therefore we believe there is a benefit to an MOA that would formalize a cooperative effort to analyze the problems and find mutually beneficial solutions in a non-punitive atmosphere.

There are two specific concerns we have with the Draft MOA Framework document:

- Roles of Agricultural Pumpers in participation of studies – We are unclear on which agricultural pumpers/diverters moving “significant” amounts of water would be required to participate in “studies as needed” and what input they would have on the studies.
- Possible Roles of Environmental Groups – We believe this should be changed to be Possible Roles of Non-Profit Organizations. It is important that the coordination and facilitation of monitoring and other studies be reviewed by a variety of non-profit interests to insure that the studies have a cost versus benefit analysis and are not driven by a particular agenda.

In addition, we believe that the removal of the Matilija Dam is a critical part of the solution of restoring the natural flow of the river and agree that a proposed MOA should include the preparation of a cost effective and viable implementation plan.

It is important to consider the vulnerability of agricultural businesses in the county and allow their perspective to be a part of the process. There are many new regulations that are threatening those who provide local food to the community and we hope that the solutions will not sacrifice this vital local industry.

We appreciate the opportunity to comment on this document and hope our recommendations are constructive. Please do not hesitate to contact us for more information.

Sincerely,



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