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Thursday, April 12, 2012

Karl Treiberg, Santa Barbara Waterfront Department
Thea Tryon, Regional Water Quality Control Board

Re: Santa Barbara Harbor Dry Dock Site case closure

Hi, Thea and Karl:

Having spoken with both of you re: the difficulties of cleaning up the polluted sediments underneath the former Dry Dock, I will say that Heal the Ocean isn't going to jump all over this issue. We understand that if the Regional Board were to require the cleanup of sediments underneath the Old Dry Dock then the RWQCB would have to require such remediation of all Central Coast/California harbors, and we'd all be broke and trying to move into the woods.

Having said that, James Hawkins (HTO Assoc. Researcher) pulled up the report you mentioned, Thea – *Environmental Condition of Water, Sediment, and Tissue Quality in Central Coast Harbors (Sept. 2007)*, and the other reports of analytical results for Harbor sediment. While we are inclined to agree that an intensive mitigation effort of the contaminated sediment under the “New” Dry Dock in the Santa Barbara Harbor is excessive, we are still concerned about the poor sediment quality beneath the “New” Dry Dock. We were also quite taken aback at the fact that the report states that out of the six harbors along the Central Coast, the Santa Barbara Harbor has the greatest proportion of sediment quality monitoring stations rated for “poor,” the lowest applicable rating in the study. Additionally, water quality within Santa Barbara Harbor received a relatively poor rating compared to the other harbors examined in the CCHS.

Yikes!

The Central Coast harbor study (CCHS) identifies several “analytes of interest” that are contributing to very poor sediment quality in the Santa Barbara Harbor, including: arsenic, copper, nickel, total chlordane, and total DDT. What is the Waterfront Department doing to get rid of, or stop the sources of, these contaminants?

We appreciate the efforts being made by the Waterfront Dept. to improve the situation (e.g., the removal of the “New” Dry Dock, the reduction in use of TBT-based paint, etc.), but with the poor grades as cited in the CCHS, is it not prudent to maintain a periodic

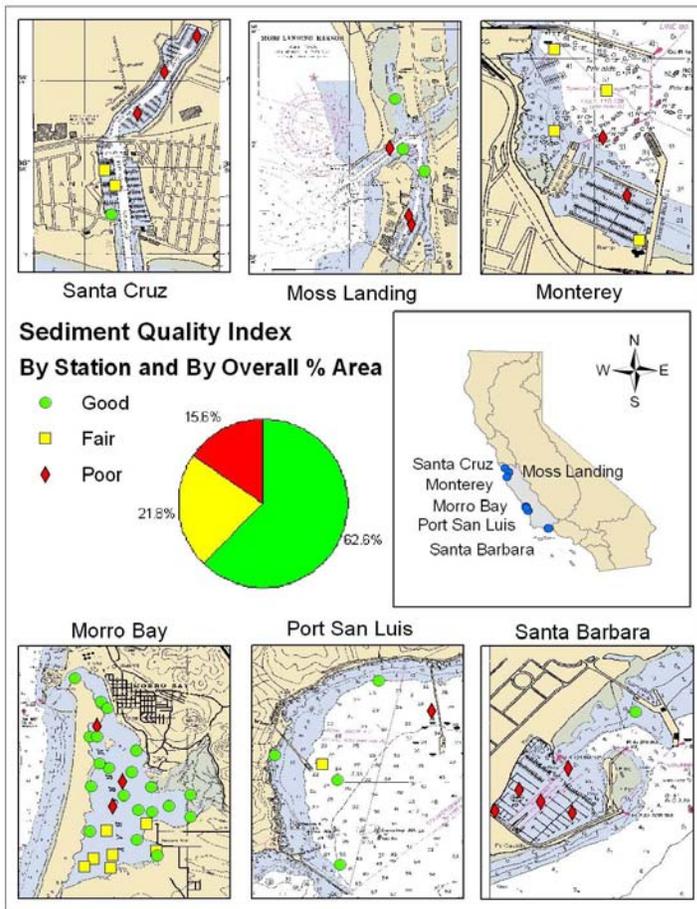


Figure 4-42 from *Environmental Condition of Water, Sediment, and Tissue Quality in Central Coast Harbors* (2007).

monitoring program in order to determine whether these actions are positively influencing the quality of the water and sediment in the Harbor?

On that note, in the Regional Board Memo from Diane Kukol to John Robertson and Thea Tryon (February 29, 2012) in #2 under the Discussion Regarding Further Action, the word “likely” should be deleted. The Water Board staff **MUST** require the City to conduct such testing if the City intends to dredge specifically from the “New” Dry Dock area.

Also, in reviewing the Public Notice of Plan for No Further Action (March 14, 2012) we took note of the section stating that the “Harbor Marine Works boat yard was connected to the City storm sewer in 2006,” and while it is desirable that this runoff does not empty into the Harbor, where is it going?

Finally, we are concerned with potential future dredging operations near the “New” Dry Dock location, in that it seems impossible there wouldn’t be disturbance of toxic metals of concern. Also, in this regard, the E-letter we received this week from Santa Barbara Channelkeeper announcing its yearly harbor trash cleanup set off a red light to us. In this event, scuba divers scour the bottom of the harbor to pull up trash. Is it healthy for divers to be combing through contaminated sediments for trash, stirring up sediment-laden water that goes into wetsuits, face, ears, etc.?

Karl, can we talk about establishing some sort of monitoring program – or any of this stuff? Thank you!

Sincerely,

Hillary Hauser, Executive Director

James Hawkins, Associate Researcher