



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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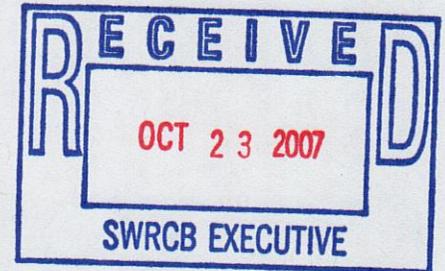
Public Comment TMDL
Ventura River Estuary
Deadline: 11/1/07 by 12 p.m.

October 23, 2007

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

Attention: Jeanine Townsend – Acting Clerk of the Board

Re: Comment Letter – Ventura River Estuary Trash TMDL



Dear Ms. Townsend,

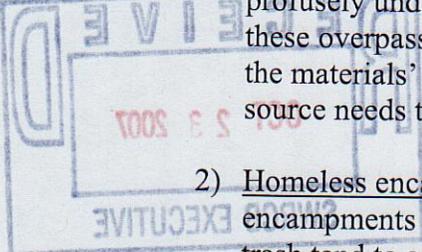
Santa Barbara Channelkeeper (Channelkeeper) hereby submits the following comments regarding the Ventura River Estuary Trash TMDL. Channelkeeper's citizen water quality monitoring program, the Ventura River Stream Team, has been collecting water quality data throughout the Ventura River watershed since 2001. Channelkeeper has a vested interest in protecting and improving water quality in the Ventura River, the estuary, and its tributaries. We are therefore generally very supportive of this TMDL as a mechanism that will hopefully address the existing trash problem in the estuary. However, after reviewing Table 7-25.1 of the TMDL, we would like the Board to consider the following recommendations before the TMDL is approved.

Our primary concern is that the upstream river and river channel itself do not appear to be included as a source of trash to the Ventura River Estuary. Based on seven years of water quality monitoring and multiple Ventura River cleanup events organized by Channelkeeper, we have determined that the river and river channel upstream of the estuary are a significant source of trash.

Table 25.1 outlines elements of the proposed TMDL to address point sources and nonpoint sources. Point sources are addressed by this TMDL by mandating a "full capture system system on conveyances that discharge to the Ventura River Estuary". We are concerned that this language will be interpreted such that only point sources that *directly* discharge to the estuary will be assessed. Many urban storm drains currently serve as significant sources of trash to the Ventura River. Several of these storm drains are located within relatively short distance from the estuary. During storm events, this trash is carried downstream to the estuary. These point sources must to be addressed by this TMDL. We recommend that language be added to the TMDL to explicitly mandate that all upstream point sources are regulated, not only those that discharge *directly* to the estuary.

Further, minimum frequencies of trash assessment and collection are proposed under the (Conditional Waiver) MFAC/BMP program to address nonpoint sources. These provisions are

listed in items 1 – 4 of the Conditional Waiver Section. We are concerned that the geographical extent covered by items 1 – 4 is not sufficient to address all non-point sources that pose a significant and very likely potential to impair the estuary. Primarily, we are concerned that trash assessment and collection events are limited to areas downstream of U.S. Highway 101. Several significant, upstream sources of trash exist just upstream of U.S. Highway 101 and must to be addressed. The following is a list of significant problems that exist within the river channel just upstream of U.S. Highway 101. (Attachment 1)

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- 1) Spray paint, paint cans, and garbage left by graffiti artists. This material accumulates profusely under the railroad tracks, Highway 101, and Main street. Graffiti artists use these overpasses as concrete canvases to paint upon. Given the enormous quantities, the materials' chemical nature, and its close proximity to the estuary, we believe this source needs to be explicitly addressed in the TMDL before it is approved.
 - 2) Homeless encampment debris above the estuary. Currently, numerous homeless encampments have been constructed upstream of the estuary. Large quantities of trash tend to accumulate around several of these encampments. Many of these encampments occur upstream of the U.S. 101 Freeway, but close enough to the estuary that they should be considered a potential source of impairment to be addressed by this TMDL.
 - 3) Garbage along the Watershed Protection District levee access road upstream of U.S. Highway 101. Channelkeeper has held multiple volunteer river cleanup events to specifically address large amounts of garbage that accumulates along the WPD levee access road, which runs parallel to the bike path.

Due to the “zero trash” Waste Load Allocations and Load Allocations described in this TMDL, Channelkeeper does not understand how these objectives can be obtained without addressing the problems listed above. Regarding nonpoint sources, at a very minimum, the locations described above must be addressed seasonally before winter storms carry upstream trash to the estuary.

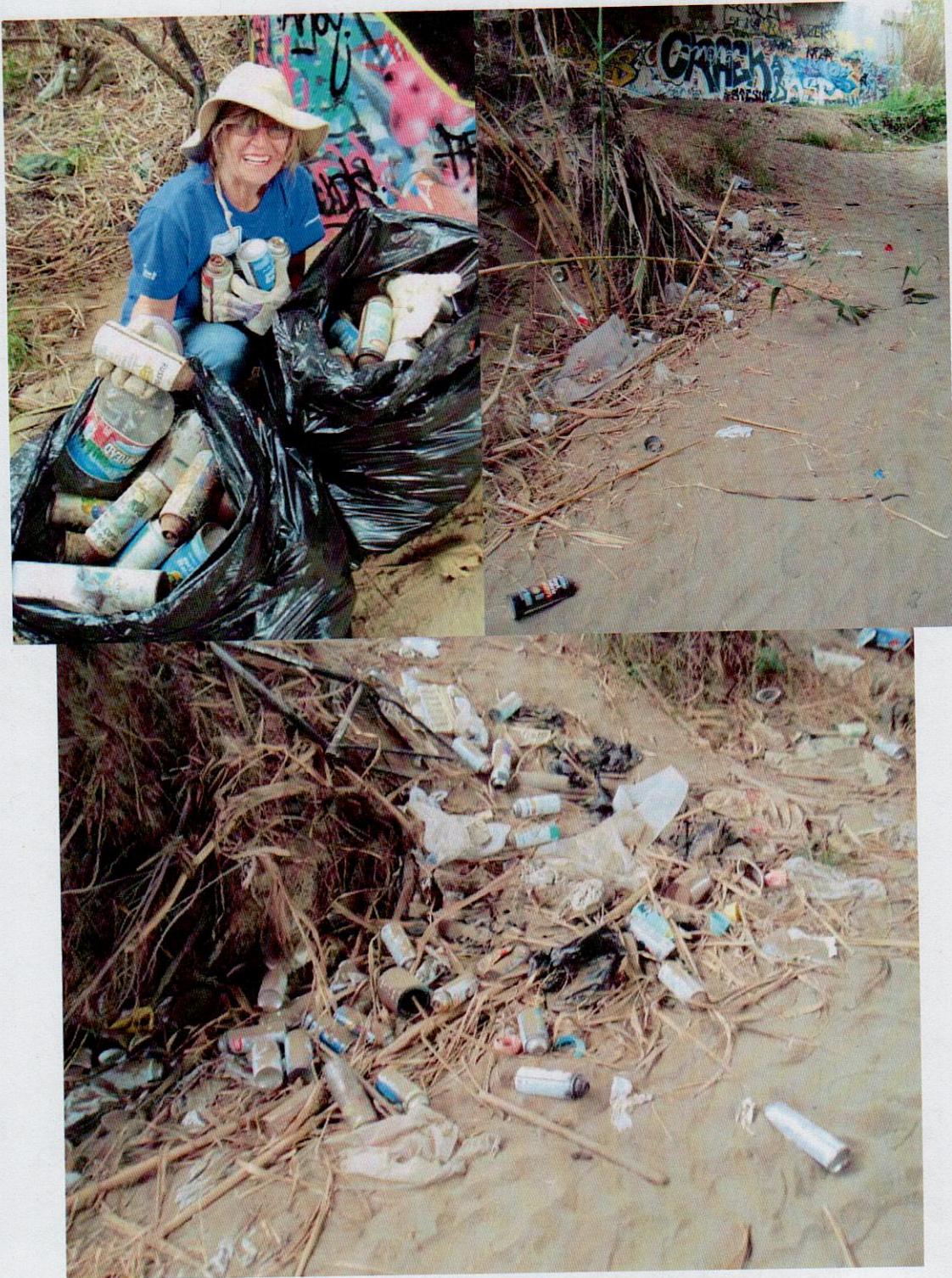
Channelkeeper would like to thank the Board for this opportunity to comment. We would like to apologize for the relative late nature of these comments; however, we have not been included on interested parties list to date.

Respectfully,

Ben Pitterle
Watershed Programs Director
Santa Barbara Channelkeeper

Attachment 1

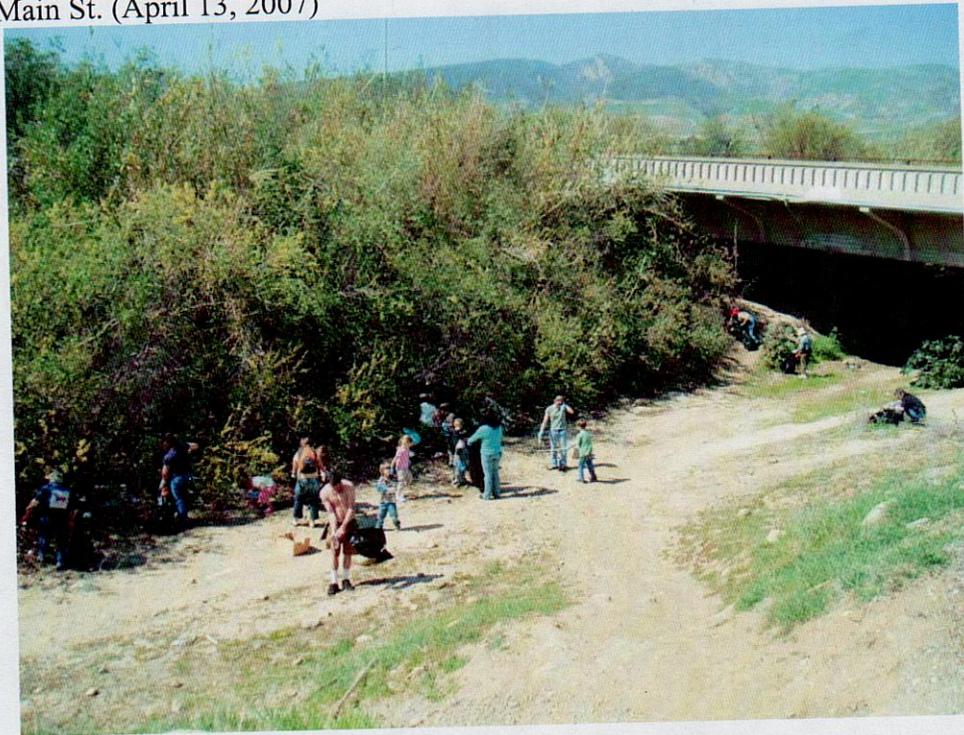
Spray paint and garbage from graffiti artists at and upstream of U.S. Highway 101



Pile of garbage from homeless encampments upstream of U.S. Highway 10



Channelkeeper volunteers during Ventura River cleanup event upstream of U.S. Highway 101 at Main St. (April 13, 2007)



Accumulated garbage from April 13, 2007 cleanup event. All collected upstream of U.S. Highway 101



Storm drain conveying garbage to Ventura River upstream of U.S. Highway 101



Storm drain conveying garbage to Ventura River upstream of U.S. Highway 101 (cont...)

