# The Ventura Audubon Society, Inc.

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Blythe Ponek-Bacharowski
Unit Chief, Municipal Permitting Unit (NPDES)
California Regional Water Quality Control Board
Los Angeles Region
320 W. 4th St., Suite 200
Los Angeles, CA 90013

Re: Ventura Water Reclamation Facility
(Municipal) NPDES Permit number CA0053651

Dear Ms. Barcharowski,

Thank you for the opportunity to comment on the January 7, 2008 version of the Waste Discharge Requirements for the City of SanBuenaventura (City) water treatment facility.

The Ventura Audubon Society considers the removal of the requirement to stop the discharge into the Santa Clara River estuary a positive first step in revising the Permit. The Santa Clara River estuary with its current water inputs constitutes an entire ecosystem. This ecosystem is made up of all levels of biological life including algae, plants, micro and macro invertebrates, fish, reptiles, amphibians, birds and mammals. All of the trophic levels of life here are dependent on adequate water to sustain them. We have noted a tendency of the staff reports to concentrate on species listed under the Endangered Species Act, but we feel that all species present in the estuary need to be preserved by maintaining adequate water levels.

We would like to address two conditions of the proposed Permit specifically. The first condition is the requirement that the City do a system wide study to determine the biological, recreational, physical, chemical and hydrological relationships in the watershed. We believe that this condition goes far beyond the concerns represented by the discharge of the City. It would encompass water sources and diversions that are outside the ability of the City to control and have no direct impact on the relationship between the discharge and health or enhancement of the estuary. Such an effort would divert time and funds from

determining the steps necessary to preserve the health of the estuary. This effort would be better limited to the specific area of concern, i.e. the river from the Victoria Avenue bridge to the ocean, the Ventura Wildlife Ponds and the adjacent beaches.

The second condition for the development of a Comprehensive Plan that addresses the function of the sub-watershed and Estuary as a single unit is certainly a worthwhile project. We feel that a thorough assessment of the bird life that is dependent on the estuary is needed. A twice monthly inventory of bird species and their numbers using the estuary and wildlife ponds throughout the year would be a good way to assess the diversity of all life enhanced by the current discharge. The relationship between the surface area of open waters present and the success of California Least Tern nesting is another possible topic for the study. You've mentioned the concern of chemical impacts on the Tidewater Goby. These chemicals may also impact the aquatic invertebrates that shorebirds depend on.

The recreational relationships assessment should include the hobby of bird watching. Every year thousands of people pursuing this hobby visit Ventura and the Santa Clara River estuary is a very popular destination. This brings eco-tourist dollars into the local economy. The estuary's close proximity to Ventura Harbor where tourists from all over the world depart to the Channel Islands National Park means that these bird watchers often include a trip to the estuary in their itinerary in addition to the bird rich areas just offshore.

Optimal water amounts for bird populations in the estuary probably include both a large open water surface area during California Least Tern nesting and exposed mudflats created when the estuary bar breaches during the fall in September. During the winter months the open water areas of the estuary and the wildlife ponds provide safe sleeping areas for ducks where they can't be reached by predators like the coyote.

Our understanding is that the current discharge is clean water with the exception of high nitrate levels. In a recent workshop conducted by your agency there was much discussion of the possibility of removing nitrates through the use of a filtration marsh/wetland. This option would provide needed nitrate removal and increase the areas that are useful to birds and other wildlife. If the filtration marsh is then discharged to the Santa Clara River the beneficial addition of water to the Santa Clara River estuary will be preserved. Design criteria should also include the ability to increase the habitat for Tidewater Gobies and for small forage fish important to the California Least Tern.

One of the determinations that the board needs to make to allow the continued discharge into the Santa Clara River estuary is that the discharge enhances the receiving waters. We believe that this is the case. In the semi-arid area that we live in water along stream courses nourishes and sustains life. This is especially

true in coastal estuaries. The Santa Clara River estuary is one of the major central California estuaries that support a unique and valuable diversity of life. The board's allowing the continued addition of water to the estuary will certainly enhance the lives of the wildlife present and all who visit the estuary.

Reed V. Smith
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