



Protecting and Restoring the Santa Barbara Channel and its Watersheds

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June 16, 2009

Attn: Man Voon
Los Angeles Regional Water Quality Control Board
320 Est 4th Street
Los Angeles, California 90013

Re: Proposed Revisions to the 303(d) List of Impaired Water Bodies for the Los Angeles Region

Dear Mr. Voon,

Channelkeeper appreciates this opportunity to comment on the Los Angeles Regional Board's efforts to update the 303(d) List of Impaired Water Bodies. Channelkeeper has compiled a brief list of comments and recommendations, provided below, regarding a subset of water bodies and proposed listings throughout the Los Angeles Region. These comments are primarily limited to water bodies and proposed listings within the Ventura River Watershed where Channelkeeper can offer informed input based on our monitoring programs and experiential knowledge of this region. Please note, that a lack of mention of any proposed listings in the following pages does not constitute a lack of support for such listings. Generally Channelkeeper supports the Regional Board's efforts to document water quality impairments on the 303(d) list that are based on credible water quality monitoring data and sound evaluation criteria.

San Antonio Creek

Channelkeeper strongly supports the Regional Board's decision to list San Antonio Creek for indicator bacteria and total dissolved solids water quality impairments as well as the existing listing for nitrogen. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations. San Antonio creek provides multiple benefits to the communities of Ojai and Ventura County. This creek flows through multiple residential neighborhoods and ranches. It is easily accessed by the public at multiple locations and frequently used for multiple forms of recreation including swimming. A deep pool exists immediately downstream of the confluence of San Antonio Creek and the Ventura River. Local community members regularly use this pool for swimming. San Antonio Creek also supports diverse riparian plant and animal communities. San Antonio Creek provides critical habitat for endangered steelhead trout, which have been observed there by biologists in recent years. In the summer of 2008 biologists counted over 200 steelhead smolts in this pool. It is imperative that these

existing beneficial uses are protected and that impairments identified through water quality monitoring activities are included on the revised 303(d) list.

Canada Larga Creek

Channelkeeper strongly supports the Regional Board's decision to list Canada Larga Creek for total dissolved solids as well as the existing listings for fecal coliform. These listings are supported by Channelkeeper's Stream Team citizen monitoring program data, which has been submitted to the Regional Board and cited as a line of evidence in making these determinations. We note that for the purposes of consistency and clarity, the Regional Board should consider modifying the listing for 'fecal coliform' to 'E. coli' or 'indicator bacteria' since the data collected by Channelkeeper that supports this listing is in fact E. coli data. The Canada Larga Watershed has been extensively used for cattle ranching. Ranching activities have contributed significantly to water quality impairments. In-stream cattle enclosures regularly result in the transport of animal waste and sediment to Canada Larga Creek and the Ventura River. The ongoing removal of vegetation from hillsides and stream banks due to grazing activities results in increased sheet flow runoff during storms, which carries vast quantities of manure to the creek and causes significant erosion to stream banks. These impairments impact both the ecology of Canada Larga Creek itself as well as the beneficial uses of the lower reaches of the Ventura River. It is imperative that existing beneficial uses of Canada Larga Creek and the Ventura River are protected and that impairments identified through water quality monitoring activities are included on the revised 303(d) list

Interpreting Narrative Objectives for Biostimulatory Substances

Channelkeeper strongly supports the Regional Board's decision to develop a numeric evaluation criterion to interpret the Basin Plan Water Quality Objective for biostimulatory substances. The existing Basin Plan nitrate objective to protect domestic and municipal water supplies is not protective of aquatic ecosystems, and the lack of such numeric criteria has been one of the most critical limitations of the existing Plan. Channelkeeper looks forward to future opportunities to comment on the methodology and criteria proposed for development of future 303(d) listing guidelines.

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Thank you for your careful consideration of these comments.

Respectfully,

Ben Pitterle  
Watershed Programs Director  
Santa Barbara Channelkeeper