

CALIFORNIA COASTAL COMMISSION

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F9b

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Correspondence

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California Coastal Commission

RE: Agenda Item F9b-5-2023

We appreciate the opportunity to provide comments on the subject agenda item.

The project area encompasses the Santa Clara River Estuary which is a vital ecosystem in the region. Ventura's vision to conserve water resources is an important environmental goal. Steps to achieve water conservation must be done in the context of the historic extent of the river estuary natural systems. Human actions, current and past, have depleted the natural water regimes and have impacted water quality. The proposed project must protect the existing rich natural resources of the area, and further enhance them to their historic extent as much as possible. With this in mind, we want to ensure the proposed actions result in a net benefit to the estuarine and coastal ecosystem.

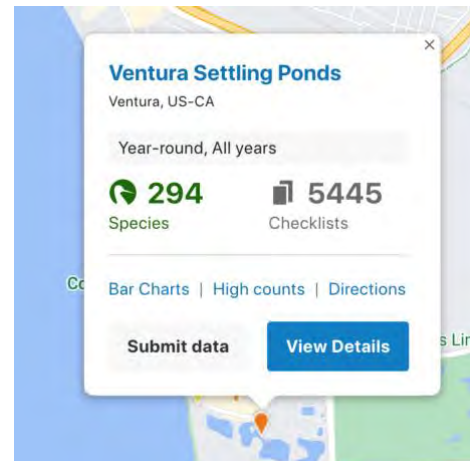
Baseline Conditions at the Estuary

Water releases from the treatment plant and the creation of the settling ponds have modified the natural systems of the estuary. Among the goals of the project, we request careful pre-project monitoring of species populations, followed by goal setting based on highest ecological benefit to the estuarine and marine ecosystems. The end goal should be to improve the ecology of the area.

Estuaries across the state have been impacted for decades. Proposed projects should improve these increasingly rare systems and analyze the benefits to species and include ecosystems services such as fisheries, aquatic health, and human health protections for swimmers on the coast.

Baseline Conditions at Settling Ponds

The existing Ponds are an official 'hotspot' on the Cornell University ebird website (see figure). eBird is among the world's largest biodiversity-related science projects, with more than 100 million bird sightings contributed annually by eBirders around the world and an average participation growth rate of approximately 20% year over year. Information is stored in the form of checklists of birds, which is then archived, and freely shared to power new data-driven approaches to science, conservation and education.



Hundreds of species and thousands of individual animals have been recorded in any given year. Rare species are present. Migratory species are present. Thousands of official checklists have been entered in eBird for the Ponds however this represents a small percent of persons who visit the Ponds because most visitors do not enter a checklist.

We have the following concerns and questions about the Ponds baseline conditions:

1. Has a professional biological report been prepared to inform stakeholders what species are present, when they are present and in what population?
2. If not, we request monitoring of pre and post project conditions to evaluate impacts to the Ponds.

Public Education Field Trip Programs

The ponds are used by educators to teach about the river estuary, and coastal resources. FSCR has provided field trips to the Ponds for less-advantaged school classes with grant funding from California State Coastal Conservancy (SCC) for years. We hosted 2,296 persons from 2018-2022 at the Ponds. We are hosting an additional 4,000 persons presently until 2025. The SCC has granted us \$200,000 for the field trip programs.

At the site, children learn to value the plant and animal wildlife, gain insight about the water environment, and are instilled with a desire to protect and conserve the environment they live in. The setting typically inspires awe in visitors.

FSCR is not the only organization using the Ponds for recreation and education. A partial list of groups have been visiting the Ponds for similar purposes and includes: Ventura Land Trust (Ventura Wild), Merito Foundation, Ventura School District, Audubon Society, and local colleges.

We have the following concerns and questions about the Ponds value for recreation and education with respect to the project:

1. The ponds essentially act as part of the historic estuary of the Santa Clara River. What priority does wildlife habitat at the Ponds have in the project scope and how does the project support that priority? If the project scope does not include the Ponds wildlife value, why not?
2. Is future recreation and education at the Ponds part of the water project plans, and how do the plans support that? If the Ponds are not included as part of the water project, why not?

We strongly believe the pond area must be a priority to ensure the health of the ecosystem and to continue and expand environmental education and access.

Proposed Water Diversion from the Ponds

As proposed, water will be diverted from entering the Ponds at 60% 2025, then 90-100% 2030. Only after diversion will monitoring be performed to evaluate if wildlife is negatively impacted from the project.

First, the project should include improvement of the baseline conditions at the Ponds. The site is valued nationally by eBird, as well as regionally for thousands of school students and

recreationists. In the present era of species scarcity and extinction, forcing a reduction in wildlife is not environmentally acceptable.

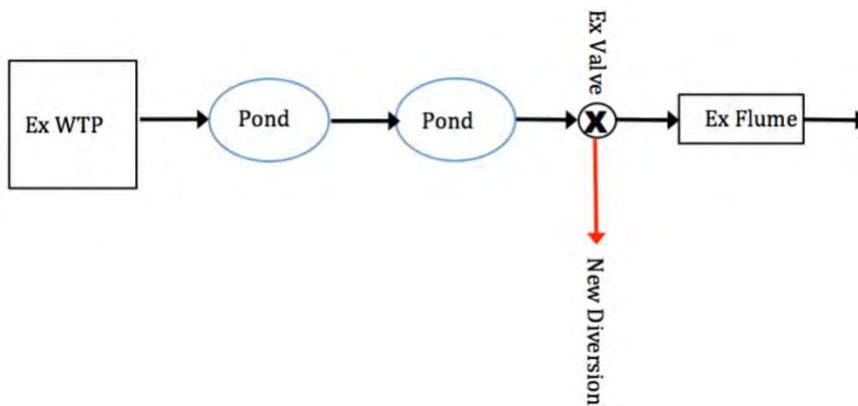
We have the following concerns about the diversion of water from the Ponds:

1. Instead of building the project and then monitoring for negative impacts, potential impacts should be studied and modeled. Such a study is wise before millions of dollars are spent only to determine problems that cost more money to fix. A forecast study would involve baseline conditions at the Ponds.
2. We need to know the percentage of water discharge to maintain baseline conditions in the Ponds.
3. What is the expected result when only 10% of water is discharged to the Ponds? Will the pond sizes be decreased, will water quality decrease, and if so, will resident and migrating species populations decline or be reduced?
4. What is the expected result if 0% is discharged to the ponds? Will the ponds be utilized by wildlife? The project should result in improved conditions for rare or endangered species.

Possible Project Alternative

The proposed project diverts flow from the existing treatment plant before circulating through the Ponds, to an ocean outfall pipe. If needed, to protect the quality of the ponds, one consideration is “instream” use by wildlife

- Divert discharge to the ocean outfall from at the existing gate valve before the existing flume structure instead of from the treatment plant (see figure). No water diversion from the ponds occurs in this alternative. Current populations of wildlife will be unaffected.



Would the above alternative be feasible and if not, why not. This alternative would satisfy both the project goals as well as maintain the Ponds condition.

Thank you for considering our comments and for your time and attention to this matter.

Sincerely,

James M. Danza, MS, AICP
Chair, Friends of the Santa Clara River