VCAILG 2021 Agricultural Conditional Waiver Public comment from the Channel Islands Neighborhood Council - CINC



Marine Advisory Committee - MAC

The purple outline shows the 2,400 acres of **VCAILG** farmland that discharges agricultural runoff into Edison Canal and Channel Islands Harbor via **Doris Drain**, **Fifth St Drain** and **Wooley Drain**.

The only **VCAILG** monitoring station in the Oxnard Coastal/ Channel Islands Harbor watershed is **CIHD_VICT**. The current location (Latitude 34.2099. Longitude -119.2207) does not accumulate representative runoff from the farms because it at the east end or at the start of **Doris Drain**. This location has not reported results for Bacteria, 6 out of the last 8 sampling events, due to "flow was not present." For the 2 events when "flow was present" significant exceedances were reported.

The new proposed location for **CIHD_VICT** (Latitude 34.2039. Longitude -119.2386) is at the discharge point of **Doris Drain** into Edison Canal. This location accumulates agricultural runoff from more of the farmland and is more characteristic of the runoff that is flowing into the receiving water of Edison Canal and Channel Islands Harbor. Flow of runoff has been observed at this discharge point all year.

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This photo was taken on August 25, 2018.

The *VCAILG Annual Monitoring Report 2018-2019* reported "no flow" at **CIHD_VICT** as of August 14, 2018.

Obvious flow was observed one week later at the **Doris Drain** discharge point into Edison Canal.

The **CIHD_VICT** monitoring site should be moved to the discharge point into the receiving waters of Edison Canal and Channel Islands Harbor because it is more comprehensive analysis of the combined agricultural runoff from these VCAILG farms.

"The <u>Harbor Beaches of Ventura County TMDL</u>, does not specify LAs for agricultural dischargers, but does include a provision for monitoring. The 2017 QAPP specified a site, monitoring frequency and constituents to comply with the implementation action specified for agricultural dischargers in the TMDL. A site description, map, and photos are provided below for the site used to evaluate agricultural discharges upstream of the **Channel Islands Harbor**.

CHID_VICT

The monitoring site is located along Victoria Avenue, just north of Doris Avenue and the Doris Drain. GPS Coordinates: Latitude 34.2099. Longitude -119.2207.

As specified in the 2016 QAPP, the **CIHD_VICT** site is visited on the same frequency as Conditional Waiver monitoring.... Flow was present at this site during Events 39 and 40.... The benchmark for Enterococcus is 104 MPN. 11/29/2018 reported 173,290 and 1/15/2019 reported 5,380."¹

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View at sampling point looking upstream



Monitoring Data

As specified in the 2016 QAPP, the CIHD_VICT site is visited at the same frequency as *Conditional Waiver* monitoring sites. At each event, flow and field meter parameters are measured in addition to water samples collected for bacteria testing. Flow was present at this site during Events 39 and 40. Table 64 provides monitoring information results.

Table 64. Harbor Beaches of Ventura County Bacteria TMDL Monitoring Data

Event	Bacteria Concentrations (MPN/100mL)			
	E. coli	Fecal Coliform	Total Coliform	Enterococcus
38: 8/14/2018			NS	
39: 11/29/2018	1,560	23,000	>241,960	173,290
40: 1/15/2019	ND	330	>241,960	5,380

¹ VCAILG Annual Monitoring Report 2019 page 94-95