

Channel Islands Neighborhood Council

Serving 1,900 homes on Channel Islands Harbor

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MAC: Marine Advisory Committee

VISIT:

www.cineighbors.com

December 16, 2020

TO: Los Angeles Regional Water Board

FR: Channel Islands Neighborhood Council, City of Oxnard

RE: VCAILG 2021 Agricultural Conditional Waiver – Public Comment

MAC's principal observations – CURRENT MONITORING SITE DOES NOT TELL THE REAL STORY OF WHAT IS DISHCARGING INTO EDISON CANAL:

CINC/MAC recommends moving the **CIHD_VICT** monitoring site from the current GPS Coordinates: Latitude 34.2099; [Longitude -119.2207](#) (at the east end of **Doris Drain** near Victoria Ave) to GPS Coordinates: Latitude 34.2038; Longitude -119.2386. This proposed site, at the west termination of **Doris Drain**, discharges agricultural runoff from about 2,400 acres of VCAILG farmland year-round.

The proposed re-location of the **CIHD_VICT** Monitoring Site to the discharge point at the **west end of Doris Drain** into Edison Canal meets several criteria listed in Appendix 2 of Order No. R4-2016-0143:

- Why is **CIHD_VICT** not even mentioned in the October 30, 2020 *VCAILG Draft Water Quality Management Plan (WQMP)*?
- **Doris Drain** accumulated agricultural runoff from about 2,400 acres of VCAILG land east of Edison Canal, which is characteristic of irrigated agricultural land within the Discharger Group.
- Proximity to waterbodies for which TMDLs have been established (Channel Islands Harbor / *Harbor Beaches of Ventura County Bacteria TMDL*) Resolution No. R2007-017
- Proximity to waterbodies on 303(d) list of impaired waterbodies
- Consistent with the location of the **OXD_CENTR** Monitoring Site which is located at the west end of **Central Ditch**, where it discharges into the receiving waters of McGrath Lake
- **CIHD_VICT** was included in the *VCAILG Annual Monitoring Reports* for 2018 and 2019, but only reported flow at the monitoring site for 2 out of the 8 monitoring events. The 2 events that reported flow showed substantial exceedances of bacteria. Benchmark for Enterococcus= 104 MPN. **Actual reported Enterococcus 11/29/2018= 173,290 MPN; 01/15/2019= 5,380 MPN**

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Public comment by Channel Islands Neighborhood Council – CINC

Marine Advisory Committee - MAC

- The **WQMP** (Water Quality Monitoring Plan) 12/15/2018 page 1 states: “water quality exceedances ...should be used to set schedules and goals.”
- The proposed new location for CIHD_VICT is GPS Coordinates: Latitude 34.2038; Longitude - 119.2386. This location shows agricultural runoff from the fields all year long.
- The **VCAILG Monitoring and Reporting Plan** (MRP) date October 10, 2011 specifies the **CIHD_VICT** monitoring location for Effective TMDLs in Table 10 (page 14)

Gross exceedances must not continue –

VCAILG is still reporting gross exceedances. The Water Board is not enforcing Load Allocation benchmarks. Exceedances of bacteria at **CIHD_VICT** Pg. 95 **2018-2019 Annual Monitoring Report**. Channel Islands Harbor Bacteria TMDL (Harbor Beaches of Ventura County R2007-017)

- *The Water Board is not enforcing Load Allocation benchmarks for VCAILG. Exceedances of pesticides at OXD_CENTR Pg. 97 **2018-2019 Annual Monitoring Report**. (McGrath Lake TMDLs R09-006) have shown significant exceedances since 2009.*
- *Compliance time schedules are extended instead of requiring more effective BMPs*

BMPs - missing or understated requirements

- New BMPs to filter and reuse runoff for irrigation should be implemented. This solution would reduce freshwater discharge into salt water, excessive water consumption in times of drought and chemical loss.
- AgWaiver should include annual progress milestones toward TMDLs and BMPs should be revisited if annual goals are not met.
- Increase the number of REQUIRED sampling events. 2 Wet and 2 Dry Weather events are not enough. Insufficient data collection due to “no flow”.
- AgWaiver does not require dischargers to comply with water quality objectives
- AgWaiver does not adequately address surface water nutrients
- AgWaiver does not adequately address surface water toxicity
- AgWaiver does not adequately address eutrophication

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MAC advocates... for strong controls on nutrient pollution from agricultural operations through the Los Angeles Water Board's Total Maximum Daily Load (TMDL) program to address excessive algae, like the Ventura River TMDL R12-011

MAC reminds the LA Water Board of the consequences of MGS Closure

The Mandalay Generating Station closure March 2018 and subsequent northern outfall closure of the Edison Canal requires a more closely examined BMPs (current BMP results are insufficient to make improvement) and enforced consequences of non-compliance and underperformance of this monitoring site and all sites that discharge into Edison Canal. Failure to monitor and enforce the TMDL at even a modest level to date, is a direct cause of the degradation of the Channel Islands Harbor.

MAC urges the LA WATER BOARD to consider the failure of the Central Coast in controlling agricultural pollution.

“UNFORTUNATELY, THE AGRICULTURAL INDUSTRY HAS EXERTED ITS POWERFUL INFLUENCE TO WEAKEN THE REGULATIONS, SO THE AG ORDERS ADOPTED BY THE CENTRAL COAST REGIONAL WATER BOARD HAVE BEEN LARGELY INEFFECTIVE IN CONTROLLING AGRICULTURAL POLLUTION ON THE CENTRAL COAST.”

SANTA BARBARA CHANNELKEEPERS

MAC has encouraged meaningful dialog to no avail.

CINC / MAC and its' volunteer community is a defender of the water quality of the C.I. Harbor and the Edison Canal. Continued non-compliance to reduce nitrates and pesticides, to manipulate self-enforcing higher standards and passive practices can quickly ignite a “me too” public movement. Our corporate neighboring farmers must not waste water and allow it to discharge into sea water and they must truly embrace best practices for severe reduction of nitrates and pesticides. The evidence of the VCAILG manipulation of the Waiver system will be in the health of the harbor – excessive algal blooms and eminent fish kill.

Respectfully submitted,

Audrey Keller *and* *Chuck Carter*

Chair, CINC

Director, CINC/MAC

VCAILG 2021 Agricultural Conditional Waiver

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Marine Advisory Committee - MAC

Contact: Channel Islands Neighborhood Council (CINC/MAC)

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CINC Board Member and MAC QAPP Water Quality Leader

CC: Rosemarie Gaglione, Adam Smith, Jeri Cooper, City of Oxnard

Attachment:

Please see the attached map showing the location of **OXD_CENTR**, current **CIHD_VICT**, and proposed new location for **CIHD_VICT**.
