



*Protecting and Restoring the Santa Barbara Channel and Its Watersheds*

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July 16, 2007

Karen Waln  
City of Ventura  
501 Poli Street  
Ventura, CA 93002

**Re: Ojai Valley Sanitary District (OVSD) Effluent Reuse Feasibility Study**

Dear Ms. Waln,

On behalf of Santa Barbara Channelkeeper (Channelkeeper), I would like to thank you for this opportunity to comment on the Ojai Valley Sanitary District Effluent Reuse Feasibility Study. Santa Barbara Channelkeeper is a local, grassroots non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through citizen action, education, field work and enforcement. Among other programs, Channelkeeper has been leading a volunteer-based water quality monitoring program in the Ventura River watershed for the past six years. Channelkeeper generally supports efforts to improve water conservation and efficiency of usage, however we believe such efforts should not be undertaken at the expense of the Ventura River ecosystem.

Channelkeeper strongly recommends that any water recycling project undertaken by the City, OVSD, and other interested parties should result in **no net loss** of water to the Ventura River. It is our position that the current water balance within the Ventura River watershed is extremely fragile and is likely already over-burdened to a degree that negatively affects ecological resources.

In addition to our position of no net loss, Channelkeeper finds that there is currently not enough information regarding Ventura River water resources to make any determination that moves this project forward. The feasibility study notes that "... the actual quantities of diversions and groundwater extractions are not known to the extent necessary to prepare an accurate water budget for the Lower Ventura River Basin." Channelkeeper believes that before this water reuse project can move forward, a comprehensive water supply and demand analysis must be completed for the entire Ventura River watershed. Such an analysis should consider the potential for future water development and regulation throughout the watershed in response to urban and industrial growth. Failure to evaluate these issues on a watershed scale before this project is implemented will likely lead to the further degradation of our river ecosystem and result in a sub-optimal allocation of water resources.

After such time that a comprehensive water analysis has been conducted, this project should then undergo full environmental review to assess its impacts and delineate all necessary measures to mitigate any adverse environmental impacts.

In both partial and full re-use scenarios, the feasibility study determined that removal of the OVSD discharge will result in negative impacts. In the 1,000 acre-foot/year scenario, when current permitted water rights are being utilized to their maximum allowable potential, it is estimated that no water would meet the mouth of the estuary 25 percent of the time. This foreseeable scenario constitutes a significant negative impact. The study states that it was written with the perspective that, "...if the impacts associated with removing the discharge from the river were significant, there would be no justification for going forward with the project, regardless of potential cost-benefits." Based on this statement, this project, as described, should not move forward.

With regard to the postulated water quality benefits resulting from diverting OVSD effluent for the purposes of oil development, such benefits would be largely negated by the reduction in water quantity that the described project would entail. The City and OVSD should not seek to improve water quality in the lower river by simply removing all of the water from it. The OVSD facility recently invested \$22 million in upgrades which were intended to improve water quality for in-stream beneficial uses. The diversion of this water for other purposes is outside the scope of the facility's current permit.

Finally, several organizations and government agencies are currently investing significant resources into the restoration of the Ventura River watershed. Recently, the Ventura City Council voted to endorse the Ventura River Parkway, a project currently being developed by the Trust for Public Land and State Coastal Conservancy which calls for the protection and enhancement of the Ventura River ecosystem. Channelkeeper views these two projects as potentially conflicting, since the water re-use project, as described, may have significant adverse impacts on the Ventura River ecosystem.

Channelkeeper thanks you for this opportunity to comment and participate in this project. We sincerely hope that City will thoughtfully consider our recommendations.

Respectfully,

Ben Pitterle  
Watershed Programs Director  
Santa Barbara Channelkeeper