



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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April 26, 2007

Pam Lindsey
Watershed Ecologist
Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, CA 93009

Re: Matilija Ecosystem Restoration Project – Giant Reed Removal Plan

Dear Ms. Lindsey,

I am writing on behalf of Santa Barbara Channelkeeper (Channelkeeper) to clarify our organization's position on the Matilija Dam Ecosystem Restoration Project. Santa Barbara Channelkeeper has been asked by agents of the Watershed Protection District (WPD) to participate in the formulation and execution of a water quality monitoring plan for this project. As stakeholders with an interest in the restoration of the Ventura River Watershed, Channelkeeper strongly supports efforts by the WPD to eradicate giant reed throughout the watershed. As an organization whose mandate is to protect water quality, however, Channelkeeper is naturally opposed to uses of potentially harmful herbicides that create a significant potential for exposure of such chemicals to surface waters of the United States.

This project is unique, in that its completion may eventually lead to the removal of the Matilija Dam. We do not in any way wish to impede this process. Channelkeeper is grateful for the opportunity to provide input to this process, and wishes to provide its services for future water quality monitoring. However, Channelkeeper cannot sign a contract to conduct and receive payment for monitoring work for a project that may significantly impact water quality without first ensuring that every reasonable effort has been made to minimize and monitor these impacts. This would be a clear conflict of interest.

Such reasonable efforts primarily should include adequate monitoring for chemicals that have the potential to enter surface waters including herbicides and their surfactants, which are used in close proximity to surface waters. Acceptable threshold limits and action levels should be written into the monitoring and work plans. Response actions should be written into the plan that describe actions to be taken should threshold limits be exceeded during the project. These actions should include an evaluation of how to better implement Best Management Practices (BMPs) to minimize surface water exposure. Monitoring should be conducted at a frequency that allows for the evaluation of the adequacy of BMPs and for the adaptive management of future work within a reasonable timeframe.

Additionally, in areas of infestation immediately adjacent to surface waters, treatment methods should be used that minimize the potential for exposure. We recommend that foliar spraying of herbicides not be used as a treatment method in these areas. Traditional cut and paint removal methods are available that should adequately eliminate giant reed while dramatically minimizing the potential for the contamination of surface water and eliminating the need to use harmful surfactants.

While we appreciate the budget and time restrictions largely imposed by grant conditions and other environmental concerns, Channelkeeper does not believe that the efforts described above are in any way unreasonable. We would like to also note that these comments do not in any way constitute a reversal of opinion expressed by this organization thus far. Channelkeeper has advocated for pesticide monitoring and has included such costs in proposed monitoring estimates submitted to project managers since we were approached about this project at the end of 2006.

Should such measures be taken, Channelkeeper would be pleased to offer its support and services for this project. We strongly believe that these actions will not only minimize potential environmental impacts, but they will also further garner broader community support which is necessary for the long term success of this giant reed eradication plan.

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

Respectfully,

Ben Pitterle
Watershed Programs Director
Santa Barbara Channelkeeper