

# The Ventura Audubon Society, Inc.

P.O. Box 24198, Ventura, CA 93002 [www.venturaaudubon.org](http://www.venturaaudubon.org)

July 5, 2011

Karen Waln  
City of Ventura  
Environmental and Water Resources Division

Dear Ms. Waln,

This letter constitutes Ventura Audubon's comments on the Final Synthesis Report on the Santa Clara River Estuary study discussing the alternatives for the discharge from your water treatment plant.

Figure 11-4 which shows modeled Western Snowy Plover and California Least Tern nesting habitat areas for each alternative: This discussion doesn't give the decision makers any useful information as currently the available habitat for nesting for both species is underutilized. The main factor for Least Tern nesting success is the availability of nearby foraging habitat. If forage fish are available the terns will use nearby sandy areas outside of the estuary for nesting.

Page 2 correctly identifies the VWRP discharge as providing 90% of the flow during the March through September period when plovers and terns are nesting. Given this we do not understand how the report reaches the conclusion that elimination of the discharge will result in no decrease in foraging area for Least Terns. (See Figure 11-5 and page 207)

Page 195 shows essentially the same groundwater flow from the VWRP pond even though the report admits that implementation of Alternative 6 will likely result in the elimination of the ponds.

Using the estimates the reports provides in Table 11-1 one can derive net water flows in the estuary by summing the inflows and outflows. The current condition is shown as a positive 1.8 MGD. The report shows that eliminating the discharge will result in a flow of 0.7 MGD. We do not believe that lowering the flow in the estuary by more than half will not change the area available for tern foraging.

There are two very suspect values in Table 11-1. The first is the contribution from the VWRP ponds and this will likely be eliminated with Alternative 6. The contribution from the Northbank groundwater is suspect as NO DATA exists for

the flow values given. If you subtract the groundwater flows from these sources in Alternative 6 the new flow in the estuary is a minus 2.6 MGD. This would dry up the estuary.

I've attached a photo of the estuary taken on June 24, 2011. It represents the estuary in a dry condition. It is essentially a view of how the estuary would look if the VWRP discharge is eliminated. On that date the discharge was flowing directly to the ocean through the river mouth that is open. The river mouth was being kept open by unusually high flows from the Santa Clara River. The Victoria Avenue stream gauge showed a flow of 68 cfs, twice the normal flow at this time of year. So far this year there have only been 6 Least Tern nests on the south side of the river, adjacent to the estuary and none on the north side. (There are more Least Tern nests further south adjacent to McGrath Lake and the lake is being used for foraging.)

Page 200 discusses the use of the discharge channel for a refuge for Tidewater gobys during high river flow times. The report says it is likely that other low velocity areas would be available if the discharge is eliminated. We are quite familiar with the estuary and no other low flow areas exist. Elimination of the discharge channel will mean gobys will have no safe areas during high river flows.

The report focused on two bird species, yet 116 species were observed during the required bird surveys. Eighteen sensitive species have been recorded at the estuary. In deciding if the discharge is an enhancement consideration of all the life the estuary and wildlife ponds supports must be considered.

We believe that the synthesis report is flawed because of the above listed concerns. We support Alternative 3 with the treatment plant upgrades and enhanced denitrification using a treatment wetland.

Reed Smith, Science Chair

Attachment: Photo of estuary taken June 24, 2011

