

Re: New State Water Resources Control Board Stormwater Strategy

Dear Ms. Townsend, Clerk to the Board



I support your efforts to use more non-structural flood control engineering to capture more stormwater, which can provide many other benefits such as groundwater recharge and less fresh water waste, habitat conservation and expansion, and recreation opportunities. Using berms, walls, and concrete along rivers has been detrimental for the species that rely on natural river corridors and their accompanying vegetation for travel routes, cover, food, breeding habitat, and water sources. Disruption of access (as with riprap and walls) has permanent impacts on these species. Almost all of the river systems in the West have been manipulated and consequently the majority of endangered species are river-dependent species.

Oxnard and other Ventura County areas along the Santa Clara River have been allowed to build in the floodplain under the false impression that constructed berms would protect them during a flood. Even the best-intentioned plans to hold back "the big one" will at some point be foiled – remember, the hurricane did not impact the people of New Orleans, it was the failure of levees.

I further support using the Oxnard SCR-1 Development project as an opportunity to immediately put stormwater capture ideas into practice. This would be a high-profile, urban project along a major highway that would provide an excellent opportunity for people to become educated on the benefits our infrequent, hard rainstorms can provide instead of treating them as a disaster to be pushed out to sea.

With designs to capture and slow these inevitable floodwaters along the Santa Clara River, mistakes like floodplain development can be likely alleviated. Fortunately, Oxnard remains largely agricultural and those lands can be used to absorb the brunt of large floods. What is unfortunate is that the natural river ecosystem functions will continue to be degraded adjacent to the current and proposed development along Ventura Road.

I hope the new strategy includes removing old hardscapes and restoration of impaired streams and rivers by revegetating lost riparian plant species. It is a great example that Los Angeles is beginning to remove concrete along the LA River. Rivers stay in place because of the trees and other vegetation growing on their banks. But they also must be allowed to periodically change course within their floodplains instead of attempting to fight them. The idea of moving fresh water downstream fast is obsolete and we have to think about how to allow it to return to groundwater aquifers where it can be of use to people, crops, and the ecosystem. Mindsets need to change to treat our few rivers not as the enemy but the living hearts of communities fortunate to live next to them.

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