



State of California • The Resources Agency

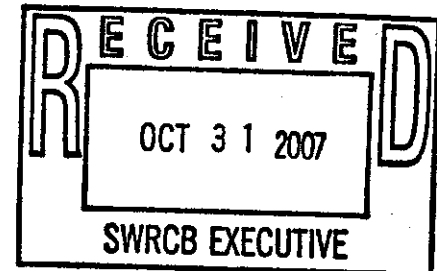
Arnold Schwarzenegger, Governor

Ruth Coleman, Director

DEPARTMENT OF PARKS AND RECREATION  
Channel Coast District  
911 San Pedro Street  
Ventura, CA 93001  
(805) 585-1847

October 31, 2007

Jeanine Townsend  
Acting Clerk to the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**RE: Comment Letter – Ventura River Estuary Trash TMDL**

Dear Ms. Townsend:

California State Parks, Channel Coast District appreciates the opportunity to provide comments on the *Amendments to the Water Quality Control Plan – Los Angeles Region for the Ventura River Estuary Trash TMDL Basin Plan Amendments (BPA)*.

As one of the stakeholders in the Ventura River Estuary, we have been actively working with Regional Board staff to develop a Trash TMDL that will eliminate the impairment in the estuary and also maintain the ability of the stakeholders in the watershed to coordinate and effectively implement the TMDL.

**Our main concern with the revised TMDL focuses on definition of the responsible parties.** The jurisdictions in the lower 8% of the Ventura River watershed are being given responsibility to collect all of the trash that originates from the entire 226 square mile watershed.

Ninety-two percent (92%) of the watershed that drains to the estuary, and thus contributes litter, is not included in the TMDL. The 30-acre Ventura River Estuary is at the terminal end of a 226 square mile watershed that extends into geographic regions managed by other agencies that are not included as responsible parties in the TMDL. The TMDL has designated responsible parties located at the very bottom of the watershed to remove litter that is generated from jurisdictions in the upper watershed. Activities that generate litter in the mid and upper reaches of this watershed include recreational fishing and hiking, off-road vehicles, homeless encampments, homes and businesses. This litter can be carried downstream and deposited in the estuary during rain events.

Other factors to consider are that this watershed is primarily open space and agricultural (97% combined) and less than 3% urban area. The portion of the watershed under State Park ownership is less than .5% of the entire Ventura River Watershed.

Thank you for the opportunity to comment and we look forward to continuing our collaboration toward a reasonable solution to improve the estuary. Please feel free to contact me at (805) 585-1848 if you would like to discuss these comments further.

Respectfully,

  
Barbara Fosbrink  
District Services Manager