



303 (d) Deadline:
January 31, 2006

LATE

MAMM,
SH3

256

HEAL THE OCEAN

704

December 29, 2005

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Comment # 256

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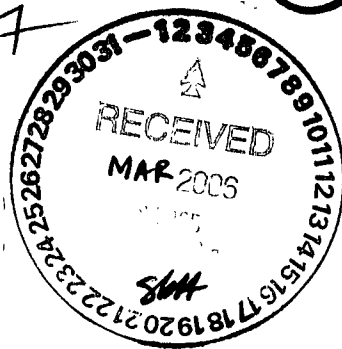
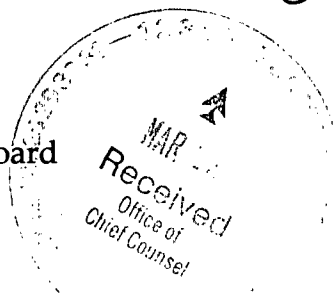
LEGAL COUNSEL

Coast Law Group, LLP

ADMINISTRATION

- Teri Taylor
- Priya Verma

Selica Potter, Acting Clerk
 State Water Resources Control Board
 Executive Office
 1001 I Street, 24th Floor
 Sacramento, CA 95814



RE: REVISION TO FEDERAL CLEAN WATER ACT SECTION 303(d) LIST

Dear Ms. Potter:

These comments on the proposed revisions to the Federal Clean Water Act Section 303(d) List ("303(d) list") are submitted on behalf of Heal the Ocean, a non-profit corporation active in improving water quality in the Pacific Ocean and local watersheds of Santa Barbara County.

We are confining our request to two waterbodies in Santa Barbara County – the Carpinteria Salt Marsh and the Goleta Slough.

Carpinteria Salt Marsh:

Carpinteria Salt Marsh should *not* be removed from the 303(d) list for sediment/siltation.

Heal the Ocean asserts that the weight of evidence presented to de-list is unsatisfactory. The argument for de-listing for sedimentation is based on the claim that the original listing was faulty, that it is based on "Regional Board staff observed erosion and sedimentation in the 1980s", thus the original listing is considered to "not be based on data."

However, EPA stipulates that anecdotal observations can be used as supporting evidence in making a 303(d) listing.



Moreover, recent studies conducted through the UCSB Carpinteria Salt Marsh Reserve program under the direction of Dr. W. Ferrin, reveal sedimentation and water quality as two of the most important management issues affecting the long-term health and preservation of the Marsh. These water quality issues are identified in the *Management Plan for Carpinteria Salt Marsh Reserve. A Southern California Estuary*.

In general, sedimentation has been identified as one of the most important management issues to preserving or restoring the health and preservation of coastal marshes throughout California.

EPA stipulates in its water quality objectives that "the suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses." The City of Carpinteria has recently amended its Local Coastal Plan (LCP) to provide for a greenhouse expansion plan. This large-scale construction project has the potential to significantly increase the discharge rate of sediment into the Carpinteria Marsh and thereby prevent the City from obtaining water quality standards. Continued protection of the Carpinteria Marsh through the 303(d) listing for sedimentation is crucial.

Goleta Slough:

Goleta Slough should *not* be removed from the 303(d) list for sediment/siltation, or for metals.

Heal the Ocean also asserts that the Goleta Slough should not be removed from the 303(d) for sediment/siltation. The decision to de-list this water body is based on the claim that the original listing was faulty and the weight of evidence used to make this claim is based on the assertion that the data can not be found to support the original listing.

It is uncertain what data was used to make the original listing, but there are many recent scientific studies that have documented the sedimentation problem in the Goleta Slough. One such study done by Dr. M. Holmgren indicates that the seriousness of the sedimentation of Goleta Slough has continued to increase over time. Furthermore, Dr Holmgren indicates that during the flood event of 1995, flood waters carrying sediment topped the berm and the channel was unable to contain the flow volume. As soon as the muddy waters broke over the bank, the rate of flow dropped and, because fast

moving water carries sediment, the sediment dropped out of suspension and settled. This sediment load apparently also brought with it seeds and sprouts from upland vegetation. In addition, the level of the soil in the Slough is now at a height above that at which ocean tides can exert their effects.

Fourteen months after the March 1995 flood, the muddy area of Goleta Slough was colonized with shrubby upland growth and the result is that a forest has formed where salt marsh existed prior to 1995. By 2001 willows and *baccharis* began to dominate and a totally new kind of habitat now replaces the natural one. The insidious aspect is that this new habitat serves as an even more effective sediment trap for subsequent silt carrying flood events. As a result Goleta Slough is a highly effective sediment trap. Enormous amounts of sediment that would reach the beach and the long-shore current are now trapped in the estuary.

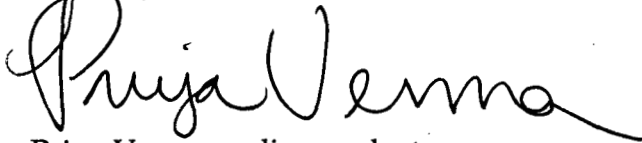
Perhaps the most significant argument against de-listing the Goleta Slough for sedimentation is the fact that the County of Santa Barbara spends hundreds of thousands of dollars every year to dredge the Slough for the purpose of removing excess sediment. These efforts are done, in large part, to control flooding. The Goleta Slough dredging project consists of dredging the Goleta Slough in the lower reaches of San Jose, San Pedro, and Atascadero Creeks. Sediment deposited by storm events is removed by a hydraulic dredge and piped to the mouth of the slough, where it is discharged into the surf zone. This project is scheduled every 2-5 years depending on sediment deposition, at an estimated cost of \$250,000 - \$500,000. As such, excessive sedimentation continues to be a significant problem for the management of the Goleta Slough.

Again, EPA water quality objectives state that "the suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses." The Santa Barbara Airport, which is part of the filled land on the Slough, will be conducting a large scale construction project over the next 10 years. This construction project has the potential to significantly increase the discharge rate of sediment into the Goleta Slough and prevent water quality standards from being met. As such, Heal the Ocean insists that continued protection of the Goleta Slough through the 303(d) listing process for sedimentation is needed to ensure efforts are being made towards protecting the Slough and meeting water quality standards.

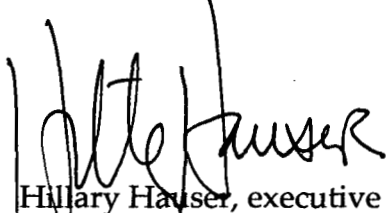
Finally, re: the proposed de-listing of metals in the Goleta Slough, the 303(d) listing of metals should NOT be removed for the Goleta Slough – not only because of Airport operations, but because of the 10-year construction/expansion of the Airport in the Goleta Slough watershed.

Thank you for giving us this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Priya Verma". The signature is fluid and cursive, with the first name being more prominent.

Priya Verma, policy analyst
HEAL THE OCEAN

A handwritten signature in black ink that reads "Hillary Hauser". The signature is cursive and somewhat stylized, with the first name being the most legible part.

Hillary Hauser, executive director
HEAL THE OCEAN