COMMENTS ON CRAFTWATER MITIGATION STUDY RECOMMENDATION FOR RECEIVING WATER STRUCTURAL STRATEGIES

Everybody agrees that the predominant source of pollutants entering Channel Islands Harbor is the agricultural runoff from the Edison Canal. Craftwater's top recommendation for receiving water strategies is to open up the north end of the canal to the ocean. The theory is that it will increase the flow of ocean water through the canal thus flushing away the pollutants. Unfortunately, there is a prevailing southerly current along the Oxnard coast. Simply opening the north end of the canal will produce a SOUTHERLY flow through the Edison Canal which will INCREASE the delivery of pollutants from agricultural runoff into the harbor. It is unknown if the increased flushing will be enough to offset the added pollutant load. Also unknown is the effect that this option will have upon sand moving into the canal and the requirement for annual and expensive dredging. We believe that the reason that a new opening at the north end became the preferred alternative is that the evaluation criteria was solely residence time rather than harbor water quality improvement.

A less risky and less costly approach is some pumping option that would recreate the NORTHERLY flow of water in the canal that was produced by the pumps at the Mandalay Generating Station. This northerly flow prevented the ag runoff from draining into the harbor, producing crystal clear water conditions for 60 years before the pumps were shut down. The pumps operated only intermittently during the last few years before shutdown and the harbor water quality was still crystal clear. All that is required to prevent the flow of pollutants into the harbor is that the outflow at the north end of the canal be greater than the total flow rate coming into the canal. We project that a continuous pump flow of as low as 3000 gpm would be sufficient to produce a northerly flow for 11 months out of the year.
Coastal Commission approval IS possible, given that they already approved the Ventura Water Pure Outfall Project just three years ago and Coastal Commission staff was open to this strategy as long as the overall water quality program included other source control measures that are included elsewhere in this study.
A pilot project to install a small pump at the north end of the canal has a far higher chance of success than opening the north end of the canal. The cost s at least an order of magnitude lower than the $82 million for Craftwater's recommended strategy. Once installed and operated for a few months we could prove that this approach actually works and is worth proceeding with a permanent system.

We request the committee reject the proposed Receiving Water strategy and direct staff to work with stakeholders to identify another strategy that meets the goals and objectives of this program.