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December 21, 2009

Planning Commission
City of Oxnard
214 S. C Street
Oxnard, CA 93030

Chris Williamson
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VIA EMAIL

Re: 2030 Plan Public Comments: Hydrological Maps with Directional Flow for 2030 General Plan and its PEIR; Re-Naming Storm Drains and Storm Channels

Dear Chair Frank, Members of the Planning Commission, and Mr. Williamson:

Thank you for the opportunity to publically comment on the re-circulated portions of the City of Oxnard's 2030 General Plan ("2030 Plan") Program Environmental Impact Report ("PEIR") at the December 17, 2009 Planning Commission Hearing ("Hearing") and via our 12/17/09 written submission.

Ventura Coastkeeper ("VCK") is a program of the Wishtoyo Foundation, a community based 501(c)(3) non profit with over 700 members consisting of Ventura County residents, Chumash Native Americans, and the general public that enjoys, depends on, and visits Ventura County's inland and coastal waterbodies. VCK's mission is to protect, preserve, and restore the ecological integrity and water quality of Ventura County's inland and coastal waterbodies for all beings in the County's diverse community through outreach and education, restoration projects, advocacy, litigation, and community organizing and empowerment. In commenting on the 2030 Plan, VCK draws upon the Wishtoyo Foundation's unique cultural perspective, our involvement with the local community, and our experience protecting, preserving, monitoring, and restoring Oxnard's and Ventura County's waterways and waterbodies. Of particular importance to Wishtoyo and its Ventura Coastkeeper Program is that the 2030 Plan adequately protects the ecological integrity and water quality of the Ormond Beach Wetlands watershed, the Mugu Lagoon watershed, and the Santa Clara River watershed, while also protecting and improving the health and wellbeing of all of Oxnard's residents.

As such, VCK respectfully submits the following public comments to reflect VCK's testimony, requests by Planning Commissioners, and suggestions by Planning Division Staff during the December 17, 2009 Hearing.

I. Hydrological Maps with Directional Flow for 2030 General Plan and its PEIR

During oral testimony by Jason Weiner, VCK's Associate Director and Staff Attorney, at the December 17, 2009 Planning Commission Hearing ("Hearing") on the re-circulated portions of the 2030 Plan, in response to Planning Commissioners' inquiries as to the hydrological connection between regions of Oxnard and Mugu Lagoon, Jason Weiner brought to the Planning Commissioner's attention that the maps included in the 2030 Plan were insufficient for the

Planning Commissioners to make informed decisions as to how the 2030 Plan and its PEIR will effect the ecological integrity, water quality, and biological resources of Mugu Lagoon, the Santa Clara River, and all of the inland and coastal waterbodies that are hydrologically connected to land within the City of Oxnard. As such, during the Hearing, VCK requested that the 2030 Plan and its PEIR include a hydrological map with all of Oxnard's storm drains, storm channels, rivers, agricultural culverts, roadside culverts, streams, and other waterways, that includes the directional flow of these waterways. As stated at the Hearing, the purpose of this request is so that the Planning Commission can make informed decisions as to the environmental impacts of the 2030 Plan and so that environmental impacts to Mugu Lagoon, the Ormond Beach Wetlands, the Santa Clara River, and the Marine Environment can be adequately analyzed and mitigated through protections in the 2030 Plan, its PEIR, and in all future projects and their Environmental Impact Reports ("EIRs") within the City of Oxnard that use the 2030 Plan as a blueprint or guiding document to protect Oxnard's environmental resources. Commissioner Frank concurred with this request, and her concurrence was directed to Chris Williamson, the Principal Planner of the City of Oxnard's Planning Division.

VCK thus requests that the 2030 Plan and its PEIR includes a hydrological map that displays the directional flows of all waterways (storm drains, storm channels, culverts, streams, ect.) mentioned in the paragraph above. The hydrological map should identify waterways and waterbodies that experience hydrological connectivity during precipitation events or dry weather discharges of certain volumes of water, and provide explanations for complex hydrological conditions.

II. Re-Naming Storm Drains to Reflect the Historic Waterway Name

In addition, at the 12/17/2009 Hearing, Chris Williamson suggested that that historic waterways now called "drains" or classified as storm channels should be renamed in accordance with their historic names or with a name that will better protect the waterway as an ecological resource. VCK would like to respectfully request that this suggestion is reflected as a mandate and mitigation measure in the 2030 General Plan and its PEIR respectively. Giving the Oxnard Industrial Drain and other storm channels their historical name or renaming the channels to reflect their potential aesthetic, recreation, community, and environmental values as rivers will enhance respect and environmental protection of Oxnard's waterways and their receiving waters. Not only will citizens think twice about dumping trash or allowing trash to enter into their waterways from streets or businesses if their waterways are properly labeled as creeks or rivers, but such a renaming could serve as an impetus for communities to become active environmental stewards for their local waterway and their receiving waters, and for local governments to take actions to restore and protect these waterways as well. Furthermore, renaming these waterways to reflect their potential ecological vales will facilitate the ecological and aesthetic restoration of these waterways and their receiving waters, such as the Ormond Beach Wetlands, and will attract more visitors and ecological tourists to Oxnard. Additionally, renaming drains to reflect their historic names, as for instance as named by Chumash Native Americans, would help with cultural preservation and restoration efforts.

Thank you for considering our comments. Please feel free to contact us with any questions.

Sincerely,



Jason Weiner, M.E.M.
Associate Director & Staff Attorney
Wishtoyo's Ventura Coastkeeper