



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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May 7, 2007

Chair Brooks Firestone
Santa Barbara County Supervisors

Re: Budget Expansion Request

Dear Chair Firestone and Supervisors Gray, Centeno, Wolf and Carbajal:

As you know, Santa Barbara County now has an approved Storm Water Management Program (SWMP), which constitutes the County's permit under the State General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewers (General Permit). Pursuant to the General Permit, the County is now legally bound to reduce the discharge of pollutants to the Maximum Extent Practicable to protect water quality, satisfy relevant Clean Water Act requirements, and ensure that discharges do not cause or contribute to exceedences of water quality standards. As an advocacy group that has been deeply involved in the formulation of the County's SWMP since the process began several years ago, Santa Barbara Channelkeeper wishes to continue to work cooperatively with the County to help ensure that the County's obligations under the SWMP are being fulfilled.

Santa Barbara County is nearing the end of its first year of coverage under the General Permit (on June 30, 2007), and there are several important requirements that the County will have to meet in Year 2 of the Permit, including enforcing the as yet to be adopted discharge ordinance by formulating and implementing a program to prevent illicit discharges, among other means. The County must also comply with the General Permit's Post-Construction Runoff Control requirements and the Design Standards required for certain types of development.

Channelkeeper finds that Project Clean Water and the Planning and Development (P&D) Department lack the resources necessary to fulfill these and other important obligations. We therefore strongly urge you to fund an additional staff person for Project Clean Water as well as a dedicated P&D staff person to ensure that these permit requirements will be met.

Channelkeeper further urges you to allocate additional funds for street sweeping and storm drain inlet cleaning, and for water quality monitoring.

Currently, the County only sweeps commercial district and heavily-used arterial streets three to four times per year, and plans to develop at some unknown point in the future a "regular" inspection and maintenance schedule for cleaning of the 11 stormwater treatment facilities it

owns prior to the rainy season or "as needed." Compared to the Monterey region's bi-weekly sweeping of high traffic areas, bi-monthly sweeping of medium traffic areas and monthly sweeping of low traffic areas and its annual inspections of all "hot spot" catch basins and storm drain inlets prior to the rainy season, the County's efforts in this area are grossly inadequate and fail to meet the Maximum Extent Practicable standard.

Finally, while Channelkeeper applauds the County for resuming some semblance of a water quality monitoring program this year after canceling it completely in 2003, we note that it falls far short of what is necessary. Similarly situated communities throughout California are implementing monitoring programs that put the County's effort to shame. The Monterey region, for instance, monitors a minimum of 25% of all outfalls four times a year for numerous parameters and includes source tracking for pollutants of concern. We therefore strongly urge you to allocate additional resources for a more robust and comprehensive water quality monitoring program that will effectively enable the County to identify pollution problems and their sources, assess progress toward cleaning them up, ensure compliance with the SWMP, and prepare for the Regional Water Quality Control Board's imminent imposition of Total Maximum Daily Loads (TMDLs) for pollutants of concern in the County's impaired waterbodies. This is an essential component of Santa Barbara County's efforts to improve the quality of urban runoff, the single biggest source of pollution to our waterways.

In sum, Santa Barbara Channelkeeper urges you to take a proactive role in ensuring that Santa Barbara County does not fall behind in meeting its obligations pursuant to the General Permit by allocating additional funds for: 1) an additional Project Clean Water staff person; 2) a dedicated P&D staff person to ensure compliance with the Post-Construction Runoff Control and Design Standard requirements; 3) more frequent street sweeping and storm drain inlet cleaning; and 4) a more comprehensive and effective water quality monitoring program. Thank you for your attention to this matter and to your commitment to clean water in Santa Barbara County.

Sincerely,

Kira Redmond
Executive Director