



*Protecting and Restoring the Santa Barbara Channel and Its Watersheds*

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March 7, 2008

Central Coast Waterboard  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**Attention:** Shanta Keeling – Water Resources Control Engineer

**Re: Central Coast Beaches Bacteria TMDL**

Dear Ms. Keeling,

Santa Barbara Channelkeeper (Channelkeeper) would like to thank the Central Coast Regional Water Quality Control Board (RWQCB) for the opportunity to hear from Tetra Tech Consultants about their hydrology modeling, and we would like to express the following comments regarding topics discussed at yesterday's meeting.

Many legitimate concerns were brought up by local stakeholders throughout the meeting. Channelkeeper agrees that many of these issues deserve careful thought before TMDL development begins. Several local agencies yesterday expressed concern regarding the timing of this proposed TMDL in conjunction with development and implementation of local Municipal Stormwater NPDES Permits. Channelkeeper agrees with local agencies that the RWQCB needs to make review and approval of municipal stormwater permits a priority so that municipalities can begin implementing their Storm Water Management Plans. However, we do not believe that TMDL development should be indefinitely postponed pending implementation of all of these municipalities' permits. Instead, stormwater pollution prevention should be incorporated into TMDL implementation.

Many stakeholders expressed concern regarding the usefulness and validity of standard scientific methods currently used to evaluate bacteria impairments. Channelkeeper recognizes that existing scientific methods are imperfect, and we applaud agencies (particularly the City of Santa Barbara) for pursuing projects that will aid in the development of better water quality indicators. The development of this TMDL should absolutely work to incorporate the best available science. However, we are concerned that the development of EPA-approved, reliable, cost-effective, and universally available alternatives to existing indicator methods are still many, many years away. Even if such methods were available today, every sanitary district, municipality, agency, citizen monitoring group, and independent laboratory in the country is currently set up to work with existing indicators. The amount of time alone to physically convert these groups to newer methods will be significant. Further, it will be years before such methods are incorporated into Federal, State, and local policies to establish alternative water quality objectives. Although imperfect, current indicators have been used throughout the country and throughout California

for TMDL development. We do not believe that it is appropriate to delay TMDL development for the Central Coast beaches pending the establishment of better indicators. Instead, this TMDL should be developed using existing methods and policies and later be updated when better indicator methods become available.

With regard to the relative priority of a beach bacteria TMDL compared to other pollutant TMDLs, Channelkeeper strongly believes that this TMDL must come first. We agree that other significant water quality problems exist throughout the Central Coast and that these problems need to be addressed. However, we do not believe that any of these other impairments have the potential to directly affect human health across such a wide geographic range as the bacteria impairments. Although these impairments may be more complex and difficult problems to address, they should take priority over all other TMDLs.

Finally, we would like to encourage the RWQCB to work with Tetra Tech to develop watershed modeling capabilities for Central Coast watersheds. Regardless of the project's applicability to this TMDL, this effort could potentially be used for a wide variety of future watershed modeling efforts. Given that these resources are being offered to our community essentially at no cost to us by the EPA, we see no reason why this project should not be pursued.

Once again, we thank you for your time and for this opportunity to provide comments.

Respectfully,



Ben Pitterle  
Watershed Programs Director  
Santa Barbara Channelkeeper