



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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April 2, 2007

George Amoon
Community Services
130 Cremona Drive, Suite B
Goleta, CA 93117

Re: Draft Mitigated Negative Declaration for the San Jose Creek Capacity Improvement Project

Dear Mr. Amoon,

Santa Barbara Channelkeeper (Channelkeeper) appreciates this opportunity to submit comments regarding the Draft Mitigated Negative Declaration for the San Jose Creek Capacity Improvement Project. Santa Barbara Channelkeeper is a local non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds.

We are pleased to see that the City of Goleta included in this analysis multiple alternatives to the project, including the restoration of a natural channel along South Kellogg Avenue, the construction of a natural bottom channel with vertical concrete walls, and the upstream detention of storm water to reduce peak flows. We are disappointed, however, that the City found all of these alternatives to be unfeasible, and we strongly encourage the City to reconsider all of its options regarding this improvement project.

The San Jose Creek Capacity Improvement Project, while aimed at augmenting the flood control capacity of the creek, also presents a tremendous opportunity to restore a critically important watershed. Studies, including the Conception Coast Project's Steelhead Assessment and Recovery Opportunities report, which is cited in the draft document, indicate that San Jose Creek once supported a thriving steelhead trout population and that present populations still exist. Countless dollars have already been spent on restoring and managing the San Jose Creek watershed, including multiple restoration projects and a multi-year, collaborative effort by the County and stakeholders to create the San Jose Creek Watershed Plan. This plan specifically recommends that the San Jose Creek Channel Improvements project be assessed to provide for fish passage. The plan makes a recommendation to, "assess modifications to [the] proposed Goleta Old Town Revitalization Plan San Jose Creek Channel Improvements to provide for fish passage."¹

Channelkeeper agrees that improved flood protection is important and necessary for the Old Town Goleta area, however, we must respectfully remind the City of its responsibility to balance these needs with the other needs and interests of the broader community. These

¹ Final San Jose Creek Watershed Plan, 2005, County of Santa Barbara Public Works Department

interests include strong support for environmental and ecological improvements to San Jose Creek. This proposed plan does not achieve the appropriate balance between these interests. The current proposed plan does not appear to significantly improve ecological conditions within San Jose Creek, nor does it appear to examine all possible alternatives to the project, as required by the California Environmental Quality Act (CEQA).

For example, it does not appear that the City has evaluated the alternative of utilizing and augmenting the conveyance capacity of the existing old San Jose Creek channel as a high flow bypass. Has the City evaluated the construction of a deeper channel or portion of channel to be left with a natural bottom, which can offer fish passage during low flows while minimizing the impact of added roughness? According to project engineers, the primary concern with extending a natural channel to the slough is increased roughness created by channel vegetation. Has the City considered the construction of a roughened, slightly deeper concrete channel that can better provide for fish passage without creating additional flood control maintenance issues? Has the City considered a large-scale realignment of the creek to open agricultural lands to the east of Highway 217 as described in the Conception Coast Project report, which again is cited in the draft document?

Limited funding has been provided as a reason why many of these additional alternatives are not feasible. Steelhead trout are an endangered species. There are multiple sources of state, federal, and private funding that currently focus on steelhead recovery and habitat restoration as a priority right now. Channelkeeper respectfully urges the City to consider delaying project implementation to provide time to seek readily available fish passage restoration funding. The City would be far better served by meeting with local groups, the Department of Fish and Game, NOAA, and other potential funding sources, including the State Coastal Conservancy, before initiating this project in order to identify funding sources for a larger scale project that would incorporate these wider community and ecological interests. Channelkeeper firmly believes that such agencies would enthusiastically fund a larger scale alternative that would not only meet the City's flood control objectives but would also offer improved fish passage.

Channelkeeper believes that with further examination, it will be possible to identify a solution that will allow for both improved flood protection as well as significant ecological improvements to critical habitat for a federally listed endangered species. If the City approves this project without adequate fish passage measures, it will be an enormous lost opportunity and a huge setback for local steelhead recovery efforts.

Channelkeeper strongly urges the City to go back to the drawing board and evaluate additional alternatives and seek readily available funding before this project is approved. We would be happy to contribute our expertise to such an effort. Please do not hesitate to contact me should you have any questions or feedback regarding the above comments. Thank you for your consideration.

Respectfully,

Ben Pitterle
Watershed Programs Director
Santa Barbara Channelkeeper