



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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Shruti Chandra
Dudek Engineering & Environmental
621 Chapala St.
Santa Barbara, CA 93101

Re: IRWMP

Dear Mr. Fleckenstein,

Santa Barbara Channelkeeper (Channelkeeper) appreciates this opportunity to submit comments regarding the Santa Barbara Countywide Integrated Regional Water Management Plan (IRWMP). Channelkeeper is a local non-profit organization whose mission is to protect and restore the Santa Barbara Channel and its watersheds through citizen action, education, field work and enforcement.

Channelkeeper recognizes and appreciates the large amount of effort invested by the Water Agency and Cooperating Partners in the IRWMP process. The Draft IRWMP contains a great deal of valuable information regarding the historic management of water throughout Santa Barbara County. Channelkeeper strongly supports an integrated approach to regional water management. Unfortunately, however, we do not find the IRWMP to be integrated in nature, and we would like to take this opportunity to highlight the following concerns we have regarding the current draft plan.

Our primary concern with the Draft IRWMP is that it appears to be a reactive document with an implementation plan driven entirely by the need to compile a list of existing projects in order to obtain state funding for said projects. Because many of these projects were developed long ago and in isolation from one another, these preliminary solutions already set the agenda to approach problems to the exclusion of an integrated review or attempt to develop alternatives that may achieve even more beneficial solutions when viewed or implemented in an integrated manner. A truly integrated effort would identify and examine each agency's goals and needs and attempt to assess them collectively as a whole and to reconcile inconsistencies in their overall impacts to the region's watersheds. After this discussion and process has occurred, agencies should then be required to re-examine their list of projects and make adjustments or develop alternatives that may better achieve the County's regional water management goals

Theoretically, the IRWMP provides a framework for which future collaborations between cooperating partners could lead to the identification of a package of the most beneficial projects that provide integrated solutions to our water resource issues. The Draft IRWMP, however,

appears to substitute real collaboration and integration with an implementation project scoring method that is critically flawed.

Channelkeeper highly recommends that the Draft IRWMP scoring method be significantly revised so that all true costs and benefits of each project are considered. As we stated in our comment letter dated January 4, 2007 on the IRWMP:

Currently, evaluation criteria are designed so that projects are given points if they address one or more water management strategies, statewide priorities, or regional priorities. Because these strategies and priorities have been written to be all-inclusive and overlapping, some projects may score highly in all three categories for a single project attribute. For example, a traditional concrete bank stabilization project would automatically receive points in all three categories simply because it is a storm water management flood control measure. Therefore, projects are being scored two or three times for the same attribute. The same could be said for many ecological restoration projects.

A project should not score more than once for the same attribute simply because both state and regional priorities share that attribute. A truly integrated project should contain multiple types of attributes that meet state and regional priorities and the grading system should reflect this more accurately.

Furthermore, many of the listed projects, while scoring highly for certain state and regional priorities, actually run counter to other priorities. For example, the same flood control project would likely have a negative impact on water quality, ecology, and aesthetics. There is currently no mechanism in the existing evaluation that accounts for this. This seems like a critical flaw in the process. If a project is going to be scored highly for each time it meets a certain priority, it should also score negatively for each time it runs counter to other state and regional priorities.

To reiterate these concerns regarding the scoring system, Channelkeeper finds several of the matrix rankings in Appendix D of the draft document highly questionable and flawed. For example, Channelkeeper does not see how the Santa Barbara County Flood Control District's Las Vegas and San Pedro Creeks culvert project "Protects, Restores, and Enhances Ecological Processes in Aquatic Areas," yet it receives credit for this State Priority. The same project also receives credit for "Ecosystem Restoration" as a Countywide IRWMP Strategy and for "Protecting, Restoring, and Enhancing Ecological Processes in Aquatic Areas," as a Countywide Regional Priority. In fact, the only credit that Channelkeeper believes this project should receive is for flood control measures, which ironically is a shared attribute amongst all three ranking categories, granting this project three points regardless according to the proposed scoring method. This same project runs counter to multiple priorities including the protection of ecosystems, water quality protection, as well as recreational and educational opportunities. Despite these flaws, this project receives another point for "Lack of Significant Long-term Adverse Impacts." In fact, this traditional flood control culvert project received seven out of eight points on the Overall Evaluation Matrix. This score ranks this project equally as high as a project such as the Quiota Creek Fish Passage Enhancements Project, which truly and meaningfully provides the above-listed benefits while also improving flood control capacity.

Channelkeeper notes that some of the projects listed in the Draft IRWMP are in fact required mitigation projects for various agencies. Both the Quiota Creek Fish Passage Project and the El Estero Swale Restoration Project are projects required as mitigation for environmental impacts of previous projects. Required mitigation projects should not be included on the

IRWMP implementation project list. Channelkeeper recommends that such projects be removed.

Channelkeeper also objects to the exclusion of non-profit groups from the list of Cooperating Partners for this Draft IRWMP. The State Eligibility Requirements clearly state that non-profit organizations are eligible grant recipients. The exclusion of such organizations as equal participants in the plan is a failure of this IRWMP process to provide sufficient stakeholder involvement.

Channelkeeper highly recommends that the final version of the IRWMP include land-use planning as an official water management strategy. The State guidelines list land-use planning as a potential water management strategy to be considered by the Regional Water Management Group. Channelkeeper firmly believes that many of our water issues can be solved ahead of time or prevented through truly integrated planning efforts. These efforts need to include discussion and analysis on the true impacts to water quality, ecology, water supply, and flood control caused by floodplain development or encroachment and anticipated regional growth. Section M of the Prop 50 Chapter 8 guidelines state that the plan must “demonstrate coordination with local land-use planning decision-makers.” Channelkeeper believes that such coordination should go beyond the existing project permitting processes as this Draft IRWMP suggests. A truly integrated plan should incorporate discussions with planning and land-use decision makers on how the goals of the IRWMP could be better met by the incorporation of land-use planning management strategies. To leave these considerations out of this document severely limits its effectiveness.

In addition, we recommend that the IRWMP include watershed management planning projects in its list of implementation projects. Such projects are deemed appropriate in the State grant guidelines, have been submitted in other regions as grant proposals, and are severely lacking in Santa Barbara County. Channelkeeper recommends that a regional watershed management planning project be added to the list.

For this process to be successful there needs to be a consistent, ongoing effort by all cooperating agencies and stakeholders to internally and collaboratively filter current and future projects through the goals and objectives established by the IRWMP. It is not clear from the Draft Plan that an adequate framework for this type of ongoing analysis exists.

Channelkeeper is grateful for this opportunity to comment on the IRWMP process, and we applaud the participating partners' efforts in attempting to create such a plan. As of yet, however, Channelkeeper feels that this process contains several flaws that should be addressed before the plan is finalized. Thank you for your consideration of our comments.

Respectfully,

Ben Pitterle
Watershed Programs Director
Santa Barbara Channelkeeper