

January 17, 2008
Goleta City Council Hearing
Goleta General Plan Amendments - SBCK Oral Testimony

I hope that the Council will consider the written comments through which we strongly encourage the Council to consider community feedback received at city workshops and maintain strong environmental protection policies.

At this point, I'd like to bring to the council's attention one particular item of concern... the proposed amendment to Conservation Element 10.3, the incorporation of Best management practices for stormwater management.

Page 31 of the City's Storm Water Management Program clearly states that the City shall, "develop, implement and enforce a program to insure that post development peak storm water runoff discharge rates shall not exceed the estimated predevelopment condition." Therefore, deleting this language from the General plan will Not only not meet the stated rationale of making it consistent with the SWMP but it also moves the city in a backward direction while the State and Regional water quality control boards are moving forward on this type of regulation.

The State Water Board is currently in the process of revising the municipal stormwater permit. In meetings they have asked us to participate in regarding their plans for this permit update, they have indicated that they will indeed be requiring these types of runoff controls in the next permit, which they anticipate approving this year. The City will therefore be forced to comply with these rules in the very near future, so approving this amendment would move the city into non-compliance with imminent state and federal rules regarding Peak Storm Water Runoff Discharge Rates.

The current language not only complies with these imminent requirements, but also ensures that future development in Goleta will not overburden our already taxed storm sewer infrastructure and further pollute and erode our creeks, many of which are already impaired.

Allowing new development and redevelopment projects to proceed without these necessarily rigorous stormwater controls WILL WORSEN water quality in Goleta's waterbodies at a time when the Regional Water Board is beginning a process to formulate Total Maximum Daily Loads for pollutants of concern feeding into Goleta Slough and Goleta Beach.

it will be that much harder for the city and other dischargers to comply with these future limits if stormwater discharge rates are not adequately regulated through the General Plan.

Given the community's overwhelmingly stated interest in maintaining strong environmental policies, approval of the proposed change is a huge step in the wrong direction. Further, this amendment should not be listed as a track 2 change as its modification could certainly result in future significant impacts to water quality as development projects are held to a less stringent standard than currently provided.