



Protecting and Restoring the Santa Barbara Channel and Its Watersheds

714 Bond Avenue ♦ Santa Barbara, CA 93103 ♦ Tel (805) 563 3377 ♦ Fax (805) 687 5635 ♦ www.sbck.org

October 3, 2008

Mr. Dominic Roques
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906
Via email: droques@waterboards.ca.gov

Re: Resolution No. R3-2008-0071, City of Lompoc Storm Water Management Plan

Dear Mr. Roques:

Please accept the following comments on Resolution No. R3-2008-0071 regarding the City of Lompoc's Storm Water Management Plan (SWMP), which are hereby submitted by Santa Barbara Channelkeeper. Channelkeeper is a non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds, and for the past five years we have been reviewing and commenting on the draft SWMPs of municipalities throughout Santa Barbara County with the goal of ensuring that they will meet the requirements of California's General Permit for Storm Water Discharges from Small Municipal Storm Sewer Systems (MS4s) (hereafter "General Permit") and will be effective in protecting water quality and reducing the discharge of pollutants to the Maximum Extent Practicable (MEP).

Channelkeeper supports all of the SWMP revisions recommended in the Resolution and urges the Central Coast Regional Water Quality Control Board (RWQCB) not to approve the SWMP without requiring these revisions. We would like to express our particular support for the recommended revisions to adequately address hydromodification, post-construction and long-term watershed protection. The RWQCB has the legal authority to require the conditions laid out in the Executive Officer's February 15, 2008 letter, as clearly articulated in the EO's July 10, 2008 follow-up letter, and that letter generously provided an additional six months for Central Coast municipalities to develop and implement appropriate hydromodification control measures and associated numeric criteria, as well as detailed examples to guide municipalities in their development. The time has come for the City of Lompoc to move forward with revising its SWMP such that its SWMP will meet the Maximum Extent Practicable standard and implementing the BMPs therein, rather than continuing to object to the requirements necessary for the City to reduce stormwater pollution.

While Channelkeeper supports the revisions recommended in the Resolution, we recommend that three additional revisions be required by the resolution in order to ensure that the City's SWMP meets the MEP standard. We note that, in their Response to Comments, RWQCB staff agreed with

the majority of Santa Barbara Channelkeeper's recommended amendments, yet in many cases they state that such changes are not necessary for the SWMP to be approved, or that they will evaluate the BMP during the first Annual Report review, or that they "encourage" the City to improve the BMP but are not requiring it (without indicating how they are communicating such encouragement). Channelkeeper finds this to be highly unsatisfactory. This is the RWQCB's chance to make sure that the City of Lompoc's SWMP will be effective in reducing stormwater pollution and will satisfy the requirements of the General Permit. As we have seen in the case of Santa Barbara County, the Annual Report review process has not resulted in any significant improvements to the grossly inadequate SWMP approved by the RWQCB in July 2006, despite numerous promises at that time that it would. Channelkeeper therefore recommends that the following SWMP revisions also be required pursuant to the Resolution under consideration.

Our first recommended revision pertains to public meetings (BMP 2.3.3). The City must not only hold public meetings on the SWMP and any associated ordinances, but it must also solicit public comments on the drafts of these documents, provide sufficient time for response, and commit to incorporating the public's comments as appropriate into revised versions of these documents prior to their finalization. Moreover, the City must also commit to conducting public meetings each year to explain the City's progress in implementing the SWMP and to present and solicit public comment on its draft annual SWMP implementation reports and should incorporate comments it receives from the public into the annual reports before submitting them to the RWQCB. It is extremely important that the public be fully informed and involved in the implementation and evaluation of the SWMP, as required by the General Permit.

With regard to the storm water hotline, Channelkeeper strongly urges that the City be required to develop a database that records the number of calls as well as the time, location and precise nature of illicit discharges reported and the City's actions to investigate and eliminate the discharges so that the City can utilize this information to identify patterns of problems that it can then prioritize and use to guide its field investigation and abatement strategies.

Finally, the City should create a systematic plan for its illicit discharge detection surveys such that they focus first on priority areas or areas where there have been past pollution problems or particular sources that have a likelihood of contributing pollutants to the MS4. A database similar to the one described under the stormwater hotline BMP should be developed and utilized to target future inspection efforts.

Thank you for the opportunity to provide comments on the Resolution recommending revisions and approval of the City of Lompoc's SWMP. Please do not hesitate to contact me should you have any questions regarding the above comments.

Sincerely,



Kira Redmond
Executive Director