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September 10, 2018

Hon. Das Williams, Chair County of Santa Barbara Board of Supervisors 105 East Anapamu Street Santa Barbara 93101

Re: Short-Term Sediment and Debris Management, Item #3 Addendum to Agenda of September 11,

2018

Chair Williams and Members of the Board of Supervisors,

The Goleta Water District (District) appreciates the opportunity to submit initial comments on the proposed trucking of Carpinteria Salt Marsh sediment to vacant County of Santa Barbara (County) property west of the County Emergency Operations Center (Cathedral Oaks Campus). Unfortunately, the District first became aware of this proposal after it was docketed for your Board's consideration. As a result, the District has not had sufficient time to assess the range of potential impacts from the proposed temporary sediment stockpile at the Cathedral Oaks Campus. While the District understands the County's significant short-term need to store this material, we are concerned that this activity has the potential to harm the Goleta Groundwater Basin, upon which over 80,000 people living in the Goleta Valley depend.

The District owns and operates nine municipal water wells within the Basin that provide safe, reliable drinking water to the community living throughout Goleta Valley. The Goleta Groundwater Basin also provides a critical source of supply during drought, and over the years, ratepayers have invested substantially to protect water rights and preserve the viability of the basin. As such, the District takes any potential activities that could harm the health of the Basin very seriously.

The County is aware that the proposed site is upslope of an area identified in our Stormwater Resource Plan, completed in 2017, as recharging the Basin. This Plan identified all significant drainage paths in the District, soil types, impaired waterbodies, and other constraints for capturing stormwater to help augment water supplies and recharge the Basin. Specifically, one parcel owned by the County, APN 059-140-023, was identified as having significant infiltrative soils such that there is recharge to the Basin from this site. The site lies directly downslope of the proposed site for temporary stockpiling from the Salt Marshes, adjacent to County Dump Road down to U.S. Highway 101. Additionally, beyond the parcel identified above, it is unclear what consideration the County has given to potential runoff into the San Antonio Creek watershed, which also recharges the Basin.

While the District understands the County's desire to move forward with this project, the fact that it is proposing to do so under an emergency permit means that it is exempt from environmental review under CEQA. Accordingly, the District has no knowledge of whether the County has identified and considered

the potential significant impacts to critical "life-line" water resources and whether it plans to adequately mitigate such impacts.

If the County elects to move forward with its staff recommendation, in lieu of utilizing alternative sites identified, it is imperative that it take all necessary measures and precautions to ensure that its actions don't compromise the community's fragile groundwater resources. Providing the public with details about how runoff will be controlled, including a plan to sample, test, and monitor the site to ensure that possible contaminants do not migrate from the disposal areas and infiltrate into the Basin would be both appropriate and helpful.

Again, thank you for the opportunity to provide these initial comments and your consideration of how County operations relate to critical groundwater water supplies within the Goleta Valley.

Sincerely

John McInnes General Manager

cc:

Mona Miyasato County Executive Officer County of Santa Barbara