



City of Santa Barbara

Public Works Department

www.SantaBarbaraCA.gov

March 28, 2013

Main Office

630 Garden Street
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Santa Barbara ChannelKeeper
Ms. Kira Redmond, Executive Director
714 Bond Avenue
Santa Barbara, CA 93103

Administration

Tel: 805.564.5377
Fax: 805.897.2613

Lawyers for Clean Water
Mr. Drevet Hunt
1004 O'Reilly Avenue
San Francisco, CA 94129

Engineering

Tel: 805.564.5363
Fax: 805.564.5467

SUBJECT: TRANSMITTAL OF ANNUAL REPORTS

Dear Ms. Redmond and Mr. Hunt,

Facilities

Tel: 805.564.5415
Fax: 805.897.2577

I am writing to transmit the following reports:

- Annual Report on Collection System for 2012
- Exfiltration Abatement Plan for 2012
- SSO Reduction Action Plan for 2012

Street Maintenance

Tel: 805.564.5413
Fax: 805.897.1991

Additionally, we would like to take this opportunity to respond to Ms. Redmond's letter of January 15, 2013. In her letter, Ms. Redmond asserts that the City failed to comply with the Consent Decree in two areas-failing to meet Sanitary Sewer Overflows (SSO) Reduction Performance Standards and failing to complete two miles of rehabilitation, replacement or repair on pipe segments that meet the criteria for High Risk Pipe (HRP) designation in the Consent Decree.

Transportation

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Contrary to Ms. Redmond's assertion, the City is in full compliance with the Consent Decree. In August of 2012, the City submitted to ChannelKeeper an initial Exfiltration Abatement Program Plan in which the City informed ChannelKeeper that it planned on rehabilitating, replacing or repairing 0.64 miles of HRP in 2012, and that, due to the overall Consent Decree expenditure cap, it did not anticipate completion of the full 2 miles of HRP in the calendar year. In recognition of an increased need for collection system improvements, the City had been focusing additional resources on Collection System Capital Improvement Plan (CIP) in 2010 and 2011. Some of that work carried into 2012; however, it had not been targeted at the specific programs described in the Consent Decree, such as the HRP program, especially given that the Consent Decree was not finalized until May 2012.

Water Resources

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As City staff has done evaluations related to designating HRP segments, and as staff has analyzed information for the 2013 reports, additional information has allowed us to better characterize some of the pipe segments that were not previously identified as HRP, as well as capturing some rehabilitation, replacement and repair work that had not previously been captured. The actual accomplishment for 2012 is that 1.02 miles of HRP that were rehabilitated, replaced or repaired. Further, the overall amount of collection system pipe

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rehabilitated, replaced or repaired in 2012 was 5.12 miles. Although the City has no obligation to catch up for HRP work not completed in 2012, it is our intent to do so over the subsequent years of the Consent Decree.

The City shares Ms. Redmond's disappointment at the number of SSOs last year and remains committed to continuing to implement work practices and procedures to reduce the number of SSOs. Failure to achieve the SSO Reduction Performance Standards does not, in and of itself, represent a failure to comply with the Consent Decree. Rather, it requires the submission of an additional report, which is being transmitted herewith.

The Consent Decree provides that, if the City does not meet the SSO Reduction Performance Standards because of one or more SSOs for which the City had no feasible alternatives, based on reasonable engineering judgment, that it could have implemented to avoid the SSOs, then the City's SSO Reduction Action Plan shall include an explanation to that effect and need not propose additional actions.

In 2012, the City's failure to meet the Performance Standards was caused by accidents on the part of private contractors that could not feasibly have been controlled through actions of the City. The specific information related to these SSOs is explained in the report. The fact that these incidents were beyond City control means that the City is not required to develop additional work practices or measures. However, the City has identified changes to work practices and additional measures that we believe will assist us in meeting future SSO Reduction Performance Standards, and is using the SSO Reduction Action Plan as an opportunity to inform ChanneiKeeper of these changes and additional measures.

The City 2012 annual report reflects the magnitude of the wastewater collection system improvements that have been made, and the significant volume of work that was completed in the past year. We anticipate that the changes represented by the work practices will be effective in reducing SSOs on an ongoing basis in future years.

We look forward to your review and constructive input to continuing to improve the City of Santa Barbara's collection system performance.

Sincerely,



Christine Andersen
Public Works Director

CFA/mh

Cc: James L. Armstrong, City Administrator
Sarah Knecht, Assistant City Attorney III

Attachments: (will be sent by U.S. Mail due to size of attachments)

1. Annual Report on Collection System for 2012
2. Exfiltration Abatement Plan for 2012
3. SSO Reduction Action Plan for 2012