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August 21, 2008

Mr. Ken Anderson
City of Scotts Valley
1 Civic Center Drive
Scotts Valley, CA 95066

Re: Comments on the Scotts Valley Stormwater Management Plan

Dear Mr. Anderson,

The Monterey Coastkeeper is a non-profit environmental organization that exists to protect our water, watershed and the coastal ocean throughout the Monterey region. As such we are actively reviewing Stormwater Management Plans (SWMPs) that fall within our jurisdiction. This includes the Scotts Valley Stormwater Management Plan, which is undergoing the enrollment process under the Regional Water Quality Control Boards 2008 Enrollment Cycle for the State General Permit.

While we appreciate the effort that the City of Scotts Valley has put into crafting a Stormwater Management Plan, we do not believe that this draft meets the requirements of the NPDES permit; nor does it contain the roadmap needed to lead to an environmentally acceptable Stormwater Management program.

The stipulation of the NPDES permit sets forth guidelines for the SWMP that we believe this plan has not achieved. This includes selecting Best Management Practices (BMP) and assigning measurable goals, timelines and responsible parties to each BMP. Although the current draft of Scotts Valley's SWMP occasionally gives examples of what BMPs *might* look like, nowhere in the plan does the City actually commit to specific practices, or pair them with the required goals. Currently, the Scotts Valley SWMP is a plan to make a plan.

While creating a good plan is certainly a multi-step process, the Monterey Coastkeeper believes that SWMPs need to be complete before approval. The current



plan is missing entire sections, such as the Chapter 6 Pollution Prevention/Good Housekeeping, which is a paragraph stating the importance of the program, which will eventually be developed. With all due respect, this is not a Stormwater Management Plan, but a plan to make a SWMP.

Our role in this process is that of a public advocate. We participate in the public process with the intention of raising the bar on water management to reflect the environmental values of the community. We believe that a well crafted SWMP can have a tangible impact on the water quality in the region, particularly relating to hydro modification and Low Impact Development Standards. It is our hope that we can cooperate with the permit applicants to assist them in creating a SWMP that is of an acceptable standard by offering constructive criticism and feedback throughout the process.

In the past, the Coastkeeper worked with other stakeholders on the Monterey Bay Regional Stormwater Management Plan (<http://www.co.monterey.ca.us/msea/Literature/MRSWMP.htm>); the result was a plan that was heralded by the Board as an example for the region. We would like to see SWMPs of equal caliber throughout the area. We have also developed a metric for evaluating SWMPs based on the Monterey Bay plan that we have shared with other municipalities throughout Santa Cruz.

In closing, we recognize that developing a comprehensive SWMP is a challenge, and we would like to be a part of the process. We look forward to reviewing future drafts of the Scotts Valley SWMP, and seeing it develop into a complete and effective plan. Thank you for your time.

Sincerely,

A handwritten signature in blue ink, appearing to read "Allison Ford". The signature is fluid and cursive, with a large initial "A" and "F".

Allison Ford
Program Associate