

The Monterey Coastkeeper
3098 Stewart Ct.
Marina, CA 93933



Ms. Suzanne Healy
Public Works Department
City of Santa Cruz
809 Center Street, Room 201
Santa Cruz, CA 95060

Re: Comments on the City of Santa Cruz Stormwater Management Plan

Dear Ms. Healy,

We at the Monterey Coastkeeper have done a preliminary review of your Stormwater Management Plan as it is in the process of being approved by the Central Coast Regional Water Quality Control Board (RWQCB) for inclusion in the statewide Phase II General Municipal Permit.

First of all, we would like to commend the City of Santa Cruz for its comprehensive efforts to curb the negative effects of stormwater pollution. The scope of the City's efforts is noteworthy.

That said we believe that there are several areas of weakness in the SWMP itself. We would like to point out the areas where improvements could be made with the intention of helping the City strengthen its existing program to curb urban runoff. A strong SWMP should pull together the disparate elements of managing stormwater runoff and outline a coherent path towards continuous improvement of the program. While Santa Cruz has clearly been proactive in trying to minimize pollution from stormwater, pollution from stormwater remains a problem, as is evidenced by the presence of 303(d) listed waterways within the city and the continuous presence of pollutants of concern as listed in the SWMP.

We have two main concerns with the City's SWMP. Our first concern is that many of the BMPs in the SWMP have already been implemented; very little of the document is devoted to plans to improve existing practices. Although we appreciate the variety of programs Santa Cruz has in place, we are concerned with the persistent levels of pollution in the City's water, which the overview of the SWMP describes. It is our wish to see the current SWMP address not just what has already been implemented, but what else can be done to continuously raise the bar for good stormwater

management—to the Maximum Extent Practicable. Santa Cruz, having already implemented a wide range of activities to curb pollution, is in the position to raise that bar by selecting BMPs that truly reflect the Maximum Extent Practicable. This may include evaluating current programs to determine levels of success, and using adaptive management to ensure that programs are effective.

Our second main concern is the lack of measurable goals throughout the document. The NPDES permit states that each BMP must be accompanied by a measurable goal. “The measurable goals should be definable tasks such as number of outreach presentations to make, number of radio spots to purchase, or percentage of pollutant loading to reduce” (Phase II General Municipal Permit p.7). The RWQCB provides resources that include sample BMPs and measurable goals to illustrate the level of specificity that is required.

Although the table at the end of each section of the Santa Cruz SWMP includes a column for measurable goals, more often than not the column is filled with indicators that could be developed into goals, but are not given a fixed quantity that the city must work towards. In order for a goal to be achievable, it must be a fixed quantity that the city can work towards; this is not the case.

Chapter 4, which addresses public outreach, is a prime example, as none of the BMPs in the Chapter are given measurable goals. For example, the BMP PE-2 is to participate in public events. This is a fairly vague BMP, but paired with a more detailed implementation plan and measurable goal, it could be adequate. The paired measurable goal however simply reads, “# of public events attended per year.” This is not a goal, but an indicator.

I would like to clarify this distinction. An indicator is the attribute that you have chosen to determine whether or not a program or action is successful. The number of public events attended per year is an excellent indicator, but not a goal. While indicators are useful as a tool for evaluation, they are distinct from goals.

The Monterey Coastkeeper would like to see each selected BMP assigned a truly measurable goal that is an appropriate indicator of progress. This is not only a legal requirement of the NPDES permit, but it is important for both the City and interested parties (such as ourselves) to be able to assess the success of the programs set forth in the SWMP. It is impossible to reach goals that are never set; it is also difficult to determine success without a clear definition of what success for a particular program looks like—particularly in a program that involves so many different stakeholders with different interests and goals.

A measurable goal for the above example would be something like: "Attend 5 public events per year" or "attend 80% of public events per year". There are a variety of goals that could be made, but the city persistently does not set goals for itself.

A good example of a measurable goal in the City's SWMP is BMP MO-5, which reads "Conduct Inspections of Storm Drain Lines". The measurable goal is to TV or visually inspect an average of 1000 feet of pipeline each year over a 5 year period. This goal is clear, specific, quantitative, achievable and easy to measure. We hope to see more goals such as this one in future drafts.

Another concern worth noting is the prevalence of the phrase "budget permitting" as a condition to tasks being performed. We are concerned that this disqualifying statement could hinder the implementation of the stormwater management plan. The permit states clearly: "Each Permittee is individually responsible for adoption and enforcement of ordinances and/or policies, implementation of identified control measures/BMPs needed to prevent or reduce pollutants in storm water, and for allocation of funds for the capital, operation and maintenance, and enforcement expenditures necessary to implement and enforce such control measures/BMPs within its jurisdiction." The City should select BMPs that it is able to fund, and remove the disqualifier "budget permitting" from the plan.

In this preliminary period of the enrollment cycle, this concludes our comments. We intend to continue reviewing the SWMP in hopes of offering helpful suggestions in the future.

The Monterey Coastkeeper recognizes that the development of a Stormwater Management Plan is a long and complex process. It is our intention to provide feedback and commentary throughout the process to push for a plan that results in cleaner water for everyone, and we hope that our comments are taken as such. Thank you for your consideration, and we look forward to working with you in the further development of your SWMP. Feel free to contact us with any comments or questions.

Sincerely,



Allison Ford
Program Associate