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March 14, 2008

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Via email

Re: March 20, 2008, Agenda Item 6
Resolution Nos. R3-2008-0031 & R3-2008-0032

Dear Chair Young, Regional Board Members, and Staff:

Monterey Coastkeeper is in support of the proposed resolutions commending the project developers - and the City of Salinas - for their willingness to take extra measures protective of water quality.

We would like to take this opportunity to suggest that there is much more to be done and these projects serve as an important reminder.

- These projects implement treatment control BMPs which are considered a 10-percent solution to stormwater runoff. We need to continually remind ourselves that site design (reducing the overall footprint of impervious surfaces) is the foremost LID measure; stormwater control (using more pervious materials) is the second level; while treatment is the *third* and least desirable tier.
- The treatment features included in these projects are all connected to the City's stormwater drains. A primary goal of the new stormwater paradigm is to return water to the ground; treatment techniques such as used in these projects do little to reduce the volume or rate of flow into the municipal stormwater system and do little or nothing to return water to the ground.
- The City of Salinas is 'defaulting' to connection to the storm drain system. Soils at the Tynan site appear to be classified in the Kennedy-Jenks report as:
 - Well drained
 - Groundwater at 8-20 foot
 - High runoff potential
 - Moderately low 'saturated soil conductivity.'
 - Restrictive Soil clay layer at 15 feet.
 - .11 - .15 cm water/cm of soil water holding capacity (moderate)
 - greater than 35% soil clay content

Soils at the Sherwood Village site are:

- Well to moderately drained
- Moderate to high runoff potential
- Moderately high saturated soil conductivity



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- Unknown (but likely shallow) restrictive clay layer
- .11 - .1 available water holding capacity
- greater than 35% soil clay content

Both sites have 'mixed messages' for their ability to infiltrate stormwater runoff. While we understand and agree that some sites may have limited capacity to infiltrate ground water, we believe that the 'default' planning option should always be to infiltrate stormwater unless actual site-specific data shows it is impossible.

We applaud these projects and the City of Salinas for their small step forward and we support the resolution recognizing these projects. While there is much more that can and should be done, we recognize the City's significant progress in protecting our water quality.

Sincerely,



Steve Shimek
Monterey Coastkeeper