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November 16, 2007

Donette Dunaway
Central Coast Regional Water Quality Control Board
895 Aerovista, Place., Suite 101
San Luis Obispo, CA 93401-7906

Re: Comments on the City of Salinas Stormwater Management Plan 2006-2007 Annual Report

Dear Ms. Dunaway:

On behalf of The Monterey Coastkeeper we have reviewed the Salinas Stormwater Management Plan 2006-2007 Annual Report. We are currently working on a review of the Salinas Stormwater Management Plan as well as focusing on Low Impact Development standards. While we recognize that the Annual Report is still operating under the old Stormwater Plan, we would like to offer several comments on it with the intent of highlighting areas that could be slated for improvements in the current Stormwater Plan.

Our main concern rests upon the vagueness of some key language. Throughout the section assessing design standards and construction site management especially, we have noted a lack of definitive guidelines for implementing various permit measures. Ambiguity in the language is problematic because it does not address the actual practices that will be implemented. The effectiveness of these practices cannot be assessed without further clarification.

Several examples of this are as follows:

- *Permit 4.6 D III a I: Ensure that negative impacts of future growth on environmental quality and quality of life are minimized and adequate levels and quality of urban services and facilities are maintained (Policy LU 2.5)* Our concern is in addressing what metric the city will use to determine if water quality impact is “significant”, as well as “adequate levels and qualities” of urban services. The language here is subjective and must be further defined in

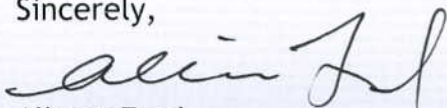


order to translate into a measurable action on the part of the city. We would like to see a more quantifiable expression of this goal.

- *Permit 4.6 D III a I: Participate in and support regional programs and projects that target the improvement and conservation of the region's groundwater and surface water supply (Policy LU 6.3):* There are no guidelines set forth for the nature of the City's participation. The City should establish its proposed role as a leading stakeholder in the improvement and conservation of regional water supplies; which programs and projects will the City participate in, and in what capacity? Given the scope and variety of projects and programs available, it is necessary to include further detail in order to illustrate that the programs which the city intends to participate in are in line with the goals of the Stormwater Management Plan.
- *Permit 4.6 D III a I: Create a community that promotes a pedestrian friendly, livable environment (CD Goal 3):* What mechanisms will be used to promote pedestrianism? Guidelines must be established as to how this goal will be incorporated into development projects in order for this to be a quantifiable and concrete plan.
- *Required BMPs for Industrial Facilities:* page 4-5 puts forward the BMP of obtaining an individual NPDES permit for industrial facilities from the CCRB for discharge to the storm drain system; the report goes on to state that this "may be an unattractive option given the time and costs that would be required to obtain and implement an NPDES permit adopted by the Regional Board." Time and cost should not be an inhibiting factor in the legal monitoring of industrial stormwater discharge; it is clear that the City is intent on addressing industrial stormwater management; however weak language such as this contradicts these goals and should be avoided.

We recognize that the Salinas Stormwater Management Plan is an ongoing project, and we at Monterey Coastkeeper hope that the city will take our comments into account in the continued development of an effective management plan. In an effort to look forward, we are focusing most of our efforts in assessing the Stormwater Management Plan, however we believe it is worthwhile to examine ongoing efforts for improved environmental management. We urge the City to continue taking the necessary steps to improve the Stormwater Plan and we thank you for the opportunity to comment.

Sincerely,



Allison Ford
Program Associate



Jeff Swartz
Program Associate