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December 3, 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 SWMP

Dear Ms. Dunaway,

Monterey Coastkeeper would like to offer our comments on the Stormwater Management Plan (SWMP) for the City of Salinas.

Our comments are made after thoroughly reviewing the Salinas Stormwater Plan and all appendices and then comparing the Salinas plan with the Monterey Regional Storm Water Management Program. The Monterey Regional Storm Water Management Program, a Phase II city, was developed to be the 'model' MS4 plan for the region. We expected Salinas to exceed the example set by Monterey; Salinas is in its' second 5-year term and is a Phase 1 city.

We trust our critique will be taken into consideration. All comments are made with the intention of moving forward in improving the development of an adequate program to manage stormwater runoff and protect regional watersheds. At this time, we do not feel that the Salinas SWMP is sufficient to accomplish this goal. In addition, we feel the long-protracted timeline for this process has taken its toll on RWQCB staff and has worn them down; we find the table of required changes proposed by RWQCB staff inadequate to meet our suggested changes or to protect water quality resources.

While we recognize the complexity of the task of developing a Stormwater Management Plan, we are unsatisfied with the product that has been submitted for review. The SWMP is a document full of unclear abstractions, vague goals and convoluted references to other sources of instruction on how to implement an effective program. Unfortunately, very little of this information is to be found in the Salinas SWMP itself.

One of our main concerns is the difficulty of assessing what the Best Management Practices for Salinas actually are. Much attention is given to existing practices, but no clear goals or tasks are outlined. While a summary of existing



practices is useful to establish a working base, the purpose of this document is to establish a measurable plan. This means a comprehensive list of BMPs followed by an Implementation Plan, including measurable goals, a timeframe, and details such as who will be responsible for what action and how parties will be held accountable. Instead, most of each Element is devoted to a vague discussion of current practices, coupled with some equally vague aspirations for the future. Suggestions for measurable goals, when they occur, are generally lost amongst ambiguities.

This is meant to be a final draft of a work long over due, and the City of Salinas is behind schedule in implementing many of the programs required of it by its NPDES permit. In order for an effective program to launch however, significant changes must be wrought in the document that is to provide guidance for such a plan. We have divided our specific comments by the elements in the order of the SWMP. Our comments are focused on Elements 2-7, which focus on some of the most important areas of stormwater management; yet these elements are the most problematic. Our comments are as follows:

Element Two which addresses Water Resources lacks detailed information throughout:

- 1 *"Each of these smaller areas drains to creeks, detention basins and/or other water bodies as shown in Figure 2-2."* (SWMP 2-2): The plan lists a variety of creeks and streams in the introduction, but no information is given as to the type of zoning that surrounds these water ways. The map in figure 2-2 is somewhat large in scale, and does not illustrate details such as the type and sensitivity of the watersheds. There is also no information given as to the presence of specific types of development around the waterways, such as industrial or residential zoning, which could have serious implications for the management of the system. More comprehensive data is necessary to give the reader an accurate idea of the connection between human development and watersheds in specific locations.
- 2 *"...the Reclamation Ditch, lacks the capacity to handle additional runoff"* (SWMP 2-11). This is a significant problem that is not addressed in the rest of the management plan. However, given the emphasis on future growth and development, it is necessary to question how this will affect the capacity of the Reclamation Ditch. In spite of projected Low Impact Development guidelines for Smart Growth, increased development is likely to lead to increased runoff. Identifying weaknesses in existing infrastructure should be a key element in planning for both future growth and stormwater management, but this is not addressed in the SWMP.
- 3 The review of water resources includes a summary of the findings and recommendations of the 2004 Salinas Stormwater Master Plan. It is noted that the Master Plan is focused primarily on managing flow and flooding, however there is some significant overlap between these issues and the daily municipal management of stormwater. Several facts are worth including in further detail:
  2. *"There were a few locations where significant overflows occurred*

