

3098 Stewart Court
Marina, CA 93933
831.883.4159
exec@montereycoastkeeper.org



Mr. Robin J. Fried
Storm Water Manager
Environmental Health and Safety
University of California, Santa Cruz
1156 High Street
Santa Cruz, California 95064

Re: Comments on the UCSC Stormwater Management Plan

Dear Mr. Fried,

Thank you for including the Monterey Coastkeeper in your list of interested parties regarding the University of California Santa Cruz's Stormwater Management Plan (SWMP). We are offering the following comments as constructive feedback in an effort to assist in the development of a SWMP that will result in the improved water quality in Santa Cruz County, and consequently, throughout the Monterey Bay region.

First of all, we commend UCSC on its efforts to develop a comprehensive SWMP. The overview, the itemized list of Best Management Practices (BMPs), the extensive appendices, and the inclusion of and linkages to outside documents and resources are all extremely helpful.

That said we would like to call your attention to the following areas of concern.

Regarding the selection of BMPs, the UCSC SWMP very rarely sets forth clear, actionable practices. BMPs are by definition *practices*: the action or process of performing or doing something. Throughout the plan however, the column titled BMPs is filled with general categories of potential practices. For example, one BMP reads: "Brochures". This in itself is not a practice; it could mean "Develop a brochure", "Distribute an existing brochure", "Research brochures to distribute", etc. Although some further detail is provided to suggest what the implementers of the plan intend to do, the lack of specificity in the phrasing of the practice is problematic.




Also of concern is the fact that the measurable goals are equally vague. The very first measurable goal for BMP 1.1: "Brochures" simply notes that: "Initial brochure available by end of Permit Year 1. This goal was met in the Fall of 2006. A second brochure was added in Spring 2007." This is neither measurable, nor a goal. In order to be a good indicator of success, a quantitative goal must be set. The current phrasing leaves the reader with many questions about the progression of this plan; What is the plan for 2009? Which brochures will be distributed? How much of the population will be targeted? How often? A better measurable goal would be something like, "In 2009 email brochures will be sent out quarterly, reaching 80% of the student body and 100% of staff." Unless the University sets a numerical goal, there is no way to determine whether or not the goal has been met.

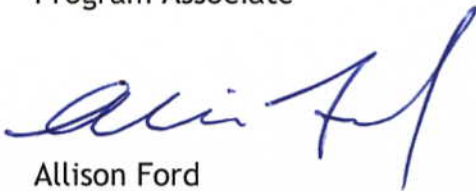
Lastly, we feel that the University could do more regarding public outreach. At the present, the effort does not go beyond the minimum requirements. We would like to see a diversification of materials, an effort to develop bilingual materials, and a clearer distribution plan.

Overall, while the SWMP seems to reflect the intent of improving water quality in the Santa Cruz County region, in order to see tangible results, the plan itself needs to be tightened substantially. The current UCSC SWMP is a work in progress that shows much promise. Thank you for considering our comments, 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,



Heather Cauldwell
Program Associate



Allison Ford
Program Associate