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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*

with the City's system" (SWMP 2-13): How few? Further detail is necessary.

- 4. "Detention of upstream agricultural runoff will be needed" (SWMP 2-13): This is a significant issue that greatly affects the quality of stormwater runoff especially given that many area watershed impairments are due to fecal coliform, nutrients, and pesticides - all related to agricultural runoff. However, it is not addressed throughout the SWMP. In fact, little time is spent on tackling agricultural runoff, even in the Element devoted to commercial and industrial facilities. Given the prominence of the agricultural industry in Salinas, this is a major oversight that must be corrected. Our affiliated organization, The Otter Project, commented on this specific point, and the City Council concurred, in an earlier draft.

In Element Three, which addresses Municipal Maintenance, the introduction states "This program element describes the City's municipal maintenance program to protect water quality through its maintenance activities" (SWMP 3-1). A list of 24 measurable goals is established. Some of these goals are more concrete than others, but the goals are for the most part acceptable assuming that BMPs and implementation plans accompany said goals. This, however, is where the problem lies. The BMPs that are set forth are vague and not coupled with any measurable implementation goals. Some specific concerns with this Element are as follows:

- 1 Section 3.3 *Strategy*, responds to the stipulation in the NPDES permit that the City of Salinas develop a Municipal Maintenance Program. The bulk of the text is an amalgam of already established practices and vague goals, such as "the City will identify and seek partners within the watershed to achieve stated goals," and, "the City will work to implement practices and programs for their proven benefits and their success in reducing pollutants of concern" (SWMP 3-5). No outline is given for a structured municipal maintenance program as required.
- 2 "A total of nineteen BMPs are proposed for Municipal Maintenance operations. These are listed in Tables 3.5 and 3.6. A description of each BMP, the approach intended, suggested protocols, associated training, and inspection are individually summarized by BMP in Appendix B." (SWMP 3-5): BMPs are a significant portion of the actual measurable stipulations of the SWMP. They should be included in the main text, followed by a specific implementation plan with quantifiable goals; this should not be relegated to an Appendix. Secondly, the BMPs were taken directly from the Stormwater Best Management Practices Handbook—Municipal, as prepared by the California Stormwater Quality Association. The document is included verbatim as Salinas' own plan. No adaptations are made to develop a specific plan for the City of Salinas. While CASQA's Handbook is a laudable resource, it was developed as a general guideline to aid the development of specific Stormwater Management Plans. As stated in the Handbook's introduction, "The purpose of this handbook is to provide *general* guidance for selecting and

implementing Best Management Practices (BMPs) to reduce pollutants in runoff from municipal operations. Federal and state programs require selected municipalities to reduce the discharge of pollutants in their stormwater discharges to the maximum extent practicable (MEP) using an array of control measures including BMPs. *It is not the intent of this handbook to dictate the actual selection of BMPs (this will be done by the municipality), but rather to provide the framework for an informed selection of BMPs for the program*" (CASQA Municipal Handbook, Section 1.1, Introduction; italics added for emphasis).

- 3 Because this section of the SWMP does not map out BMPs that have been tailored to the City's needs, there is no real implementation plan that sets forth concrete, measurable steps that the City intends to actualize. For example, section 3.5 B discusses the problem of inflows and infiltration into a sanitary sewer system. Most of this section is focused on addressing the cause of the problem, but no solution is proposed. The only suggestion of a plan is an ambiguous objective for the City to "expand its efforts and initiate a more comprehensive management approach to maintaining its sanitary and storm drain systems" (SWMP 3-9). This is not adequate enough for a final version of a Stormwater Management Plan.
- 4 3.2 Goals/Measurable Goals a-c (SWMP 3-2): "One hundred percent of existing municipal maintenance staff trained by Year 1.." (SWMP 3-2). These goals state the intention of the City to implement an employee training program for municipal staff. Some mention is made towards inviting local experts from the region to address watershed issues, yet specific guidelines still need to be outlined. Furthermore, although it is mentioned that "Training will be tailored each succeeding year, (SWMP 3-5A)" there is no stipulation made to address who will be responsible for the development of the training program; this may be problematic if the role has been outsourced to non-municipal organizations if there is no lasting structure to guarantee the continuance of the program. In table 3.7, a list of potential implementers includes groups ranging from city staff (who are the focus of this particular training program to begin with) to the CSUMB Watershed Institute to the EPA and others. Again, this measurable goal is too vague for a final version of the plan. (SWMP 3-62)
- 5 3.5 Activities B. Facility Maintenance (SWMP 3-8): "Sanitary sewer overflows can occur when sewer collection lines designed to only conduct sanitary sewage become conduits for stormwater." (SWMP 3-8) This is vague language that further circumvents the actual purpose of developing a plan to initiate a more comprehensive management approach. Quantifiable measures need to be outlined. Vague assertions that the city will "expand its efforts and initiate a more comprehensive management approach to maintaining its sanitary and storm drain systems" and "develop Stormwater Pollution Prevention Plans (SWPPPs) for all of its facilities" (SWMP 3-9) take the place of quantifiable goals with clear metrics.
- 6 Table 3.7 lists BMPs in correspondence with the Permit Section that they address, and then identifies an implementation plan and measurable goal. The following comments address the information organized in this table:

- Permit Section V.a.i-iv. *Develop inventory and map of all inlets of MS4*: The BMP for this section refers to a map plan that does not seem to be included, or is not clearly marked. Furthermore, the implementation plan reads “Conduct maintenance of inlets and outfalls consistent with Inventory and Mapping Plan.” The mapping plan does not seem to exist, which makes the rest of the plan somewhat obsolete. Additionally, the plan of conducting maintenance of inlets is too vague. The measurable goal is stated as an annual report on maintenance activities, but what exactly these activities are is unclear.
- Permit Section V.b.i *Properly operate and maintain storm drain system (SWMP 3-28)*: “Street sweeper operators, building officials and other city staff will visually scan...field sites where trash and other pollutants have been a recurring issue” (SWMP 3-28). The term “visual scan” is unclear. No guidelines are included as to what staff members are looking for, what they do when they find something, how they record the information, to what use the documents are put, or any other information that could illustrate how exactly this practice will reduce illegal dumping or increase public awareness of the issue.
- Permit Section V.c.ii *Inventory and maintenance of permittee owned and private facilities, roads, and parking lots (SWMP 3-31)*: Implementation plan is to “Require new parking designs” and “Reduce the POC that [emanate] from vehicles in parking lots, such as petroleum, oil, copper and other metals, and rubber to the MEP” (SWMP 3-31, 3-32). The only measurable goal listed is that these ambitious goals be adopted by December 2007. The actuality of requiring new designs or reducing anything is left without examination or analysis.
- Permit Section V.d. *Designate and implement BMPs (SWMP 3-34)*: Several BMPs that ought to be given individual attention are lumped together in this oddly constructed table. The nature of BMPs, Implementation Plans and Goals are often mixed up. For example, under the category of measurable goals, the text reads, “For example, shut off automated systems’ cycles when rain is predicted for more than one day” (SWMP 3-34). This is an excellent idea, and one that should be a part of the implementation plan for achieving the BMP of monitoring watering effectiveness and efficiency (3.10c), not relegated to any example.
- Permit Section V.d. *Designate and implement BMPs*: under Measurable goal: “Spills responded to 100% of time consistent with SCR (Spill Control Response Team)” (SWMP 3-37): This is not a measurable goal. How will the City guarantee that 100% of spills will be responded to? What is the protocol for responding to a spill? Where is the information on employee training regarding the handling of a spill? More detail is needed to illustrate how precisely this goal will be achieved.
- Permit Section V.d. *Designate and implement BMPs (SWMP 3-44)*: Implementation Plan reads “eliminate use of toxins for street weed control; use the PHAER approach and IPM instead. See text of this

Element for discussions on IPM and PHAER” (SWMP 3-44). The discussion of the City’s use of the PHAER approach is unclear, and does not explain how exactly the City intends to eliminate use of toxins. References to outside documents or programs need to be incorporated into the City’s SWMP, not substituted for one.

- Permit Section V.e. *Implement pesticide, herbicide, and fertilizer application*: This seems to be a typographical error, but it is one that obfuscates the intention of this set of BMPs, the first of which reads: “Reduce dependence upon potentially hazardous chemicals...” (SWMP 3-46). This error repeats throughout table 3.7, and needs to be corrected to avoid confusion of intent. Additionally, “Pesticides tanks will be emptied of all pesticides as part of the application process” (SWMP 3-56). This is also vague and the City needs to explain exactly how pesticides will be emptied. Other than covering storm drains from allowing rinse water from entering, what else is the City doing to ensure that pesticides and fertilizers do not enter water bodies?
- Permit Section V.d, V.e, and V.g (SWMP 3-49): BMP reads: “Eliminate all use of chemicals included on State 303 (D) listed water bodies anywhere within city limits, unless a serious public health and safety concern exists.” This is then listed as both the implementation plan and the measurable goal in the chart, without any details as to how this goal will be achieved. Who will oversee the elimination of these chemicals, and how will it be carried out?

Element Four focuses on Development Standards. This is a significant portion of the SWMP as Salinas expands into the Future Growth Area. The way that development occurs will greatly affect the management of stormwater. Unfortunately the bulk of this Element attempts to delegate the responsibility of establishing a decisive development plan to as many other documents as possible; rarely does the SWMP actually identify clear-cut BMPs with implementation plans and measurable goals. The language remains vague, and the consistent referencing to documents that have not yet been adopted makes it very hard to discern if any actual plan has been made to minimize the impact of future growth. Guidance is lacking on establishing the hierarchy of 1) Site Design using LID, 2) Source Control, and 3) Structural Control. Some specific problem areas are as follows:

- 1 4.5 Best Management Practices “Selection of BMPs is therefore flexible based upon several factors. Selection is first up to the project design team’s professional judgment. Second, City of Salinas staff members also have a role to ensure that requirements are met. At minimum, the suite of BMPs selected must meet the criteria established in the City’s NPDES Municipal Permit, this element and other municipal, state and Federal regulations” (SWMP 4-8). This portion of text basically passes responsibility on actually selecting any BMPs for development standards. Other references are made to the Development Standards Plan which purportedly identifies specific BMPs. “Developers are required to demonstrate hardship regarding problems with implementation of

biofiltration Bumps prior to approval of other types of treatment means, in its development means” (SWMP p. 4-13). The language used here is very unclear- what does the City classify “hardship” in this statement? Furthermore, under the section entitled BMP Selection (4.6 M. p. 4-22) the plan states that “required BMPs will be established on a project-by-project basis” (SWMP 4-22). The purpose of the SWMP is to implement and enforce BMPs: this cannot be done if the City cannot commit to any BMPs.

- 2 Section 4.6 L Development Review Process: “During the review process, staff will solicit comments from other City divisions and departments.” (SWMP 4-21) This is vague. What other agencies is the city engaging in the review process? They should all be listed. Further, the City needs to spell out the exact review process: Will a projects’ site design be reviewed at the preliminary approval stage or later in the review process after changes to the site design may no longer be possible?
- 3 Table 4.3 lists BMPs in correspondence with Permit sections. BMPs are then matched with an implementation plan and a measurable goal. Throughout the table however, it is notable that many of the implementation plans are conditional on other documents or parties. The following comments address table 4.3:
 - Permit section III.a. *Incorporate water quality and watershed protection principles requirements into planning procedures and policies* (SWMP 4-30). The BMP reads, “Update the of the City Zoning Code.” In addition to being unclear because of a typographical omission, the measurable goal for this BMP is to take into consideration the Kennedy/Jenks comments with the next revision anticipated to occur in 2008. The updating of zoning codes is an important tenet of restructuring guidelines for low impact development, and the fact that the occurrence of this project hinges upon an anticipated document with no real time frame is troublesome.
 - Permit section III.b. *Development Standards Plan: The Implementation Plan* for this section is to “Support development of LID Standards Plan.” Further, the measurable goal is to “Support the completion of the Development Standards Plan.” In addition to the plan and the goal being virtually identical, the ambiguity of the language usage is equally troubling. There are many ways a city can “support” a project without ever achieving any tangible outcomes. How exactly the City intends to do this needs to be fleshed out with a real implementation plan and actual measurable goals.
 - Permit section III.b *Development Standards Plan: The majority of BMPs and goals* under this section of the permit seem to be focused on the further development of a plan. Perhaps this meta-plan will contain some real stormwater management guidance for development, but as it currently stands, the final version of the SWMP fails to do so.
 - Permit section III.c. *Plan Review: The Implementation Plan* is as follows: “Initiate compliance with NPDES permit requirements for new developments in advance of the approved development standards. City

to use draft standards, approved standards from other jurisdictions in the state and permit sizing criteria” (SWMP 4-33). It appears that while the City is developing development standards, it will be attempting to hold developers accountable for standards that do not yet exist. Although the desire to initiate compliance with NPDES permit requirements is commendable, it seems that actually outlining Development Standards for implementation would be a more efficient use of the City’s time, rather than attempting to enforce an assembly of standards imported from other jurisdictions.

- Permit Section III.c. *Plan Review*: Implementation Plan reads “Review all applicable new development and significant redevelopment plans for compliance with the Development Standards Plan, until the Stormwater Standards are approved. Emphasis will be on sizing criteria and BMP design” (SWMP 4-34). This statement is a critical flaw as sizing criteria and BMP design do not meet the NPDES permit requirement for MEP. As noted above, MEP is defined hierarchically as 1) Site Design using LID, 2) Source Control, and 3) Structural Control. “Sizing criteria” reflect structural control and misses the overwhelming benefits of good site design. In addition, this statement is problematic for several additional reasons: First, the DSP has not been approved; second, the timeline for the development of all these plans is very unclear, and lastly, what information or guidelines the plans will contain is also vague, making it difficult to review project proposals up against them. On a related note, guidelines are not established to handle non-compliance, nor is any mention made of measurable goals or a time line for such projects. The whole scenario is vague, inadequate, and does not meet the basic requirements of the NPDES permit.
- Permit section III d. *Regional Stormwater Mitigation Plan*: The Implementation Plan suggests that Salinas “work with the County on water quality issues.” No other details are set forth as to how the City intends to do this other than the goal of writing a letter to the RWQCB by the 5th year of the permit. If the City of Salinas truly wishes to work with the county to address regional storm water mitigation, it is necessary to include a far more detailed plan as to how they intend to do so.
- Permit section III e. *Waiver Program*: Essentially this BMP is a plan to make a plan, and is insufficient at this final point in the timeline of the SWMP. The BMP reads “Formation of a waiver program” (SWMP 4-34); the lack of structure in the language makes this very unclear; it is not a management practice, let alone a best management practice. It is little more than an idea that is not expounded upon. The measurable goal listed is “submit a plan”. How this is measurable is not clear: there is no suggestion as to what this waiver program might include, or how it would be developed.
- Permit III.f. *Maintenance Agreement and Transfer*: Again, the Implementation Plan is little more than a rephrasing of the BMP, which is

to devise criteria for infill projects. The Implementation plan reads "City will devise criteria for acceptance of maintenance agreements for infill projects" (SWMP 4-35). The listed measurable goal basically states that 100% of new infill will adhere to these successful maintenance agreements for infill projects that do not yet exist. This circular reasoning is illustrative of the general flawed nature of this Element.

Element Five addresses Construction Site Management. The main problem with this section continues to be a lack of clarity in language, leading to vague assertions and unsubstantial goals. The following issues illustrate this and should be addressed:

- 4 The City lists as one of its construction objectives the plan to "protect waterways and stabilize drainage ways" (SWMP 5-4). This language is vague and the City has left out any real guidelines as to how said areas will be protected in order to meet this objective. This is a section where building and grading setbacks and compaction standards should be stated and reinforced.
- 5 The City has developed a set of criteria to determine high and low priority construction sites, yet these criteria are very unclear. The City lists the following as high priority construction sites: "Site of 5 acres or greater, projects, active or inactive adjacent to a water body, and any Site tributary to a 303(d) impaired water body or environmentally sensitive area" (SWMP 5-7). Further, low priority sites are referred to as follows: "Sites (private and public) where no grading is proposed, such as tenant improvements" (SWMP 5-7). For a developer or private citizen, it is very difficult to understand the City's priorities. For example, if a site has no grading involved but is adjacent to a water body is it still considered a low priority although there is no grading occurring in construction? Again, the City must be more detailed in outlining its goals, criteria, and standards.
- 6 The city states that tenant improvements are a low priority, but gives no guidelines as to what constitutes a tenant or a tenant improvement. Therefore, under these criteria, there is a reason to believe that many construction sites are being overlooked by the City, allowing for urban runoff pollution to flow freely in some areas (SWMP 5-4C). Further, in areas hopefully designed with LIDS, such as the Future Growth Area, tenant improvements could very significantly reduce the amount of permeable surface on a site. How will the City track and regulate this potentially significant impact?
- 7 The plan lists a set of performance standards for City staff to evaluate adequate construction site management practices. One standard in particular is excruciatingly vague: "Lack of adequate BMPs, or poorly installed measures, shall be corrected" (SWMP 5-9). How exactly will the City correct construction sites in order for them to include BMPs that they are lacking and in what timeframe will the City allow construction sites to remain active with "poorly installed measures?"
- 8 Enforcement and construction regulations are outlined, however the language used is bereft of significant details. "Inspections of such projects include review of erosion control measures and Best Management Practices" (SWMP 5-

12). How does the City review such projects during inspections? Is there a checklist involved for that process? If so, this document must be included in the SWMP so developers understand what regulations they need to follow under the City's guidelines.

Element Six outlines the City's plan to address stormwater runoff pollution through Public Education and Outreach. The introduction states "The City's approach to carry its message is through forming public-private partnerships" (SWMP 6-1). While the integration of stakeholders is a commendable plan, more detail is required to adequately illustrate how this plan is to be carried out. Although the plan makes reference to numerous other programs and organizations available as references, it does not sufficiently identify the specific educational goals and programs that will be used to reach the general public. The follow comments illustrate this general criticism:

- 1 Section 6.3 Public Outreach and Education Activities C. Target Audiences, Development Community: In describing the educational program that will target the development community, the plan lists a variety of ordinances, documents and resources ranging from the Zoning Codes (which as aforementioned and has not yet been adequately updated) to LID Development Standards, to the CASQA handbook, EPA documents, etc. This is a huge amount of information that may or may not be useful to developers in planning projects appropriate to the Salinas area. A specific program may pull from all of the resources, but a specific program plan should be outlined in this document to illustrate the nature of this public outreach campaign. Developers will not conform to standards that they cannot find or understand. Furthermore, penalties and consequences for non-compliance need to be outlined as well.
- 2 Section 6.3 Public Outreach and Education Activities C. Target Audiences: "...public outreach for industry (including commercial businesses) will need to be expanded to include all of the industrial sites listed in the City's Commercial and Industrial Element" (SWMP 6-5). This essentially amounts to a plan to make a plan for a program that targets a very important group of the community. This is not adequate and needs to be more detailed, with measurable goals to be achieved.
- 3 Table 6.2 lists BMPs in correspondence with Permit sections. BMPs are then matched with an implementation plan and measurable goal. The follow comments address this table:
 - o Permit Section VII.a.iv Public Outreach Program shall include commercial owners and operators: The BMP refers the reader to Appendix D, which contains additional BMPs for Commercial and Industrial Facilities. However, these BMPs offer basic guidelines with no real guidelines as to how these will be enforced. While Appendix D provides an adequate framework for an educational program, it is not in and of itself an educational program, and should not substitute the development of a real enforceable program.
 - o Permit Section VII .VII BMP 6.10 "Number of events and/or number of students involved" (SWMP 6-16). This measurable goal is unclear and

needs to be expanded upon. It appears in this goal as if data or language is missing.

- Permit Section VII. b. Conduct outreach (SWMP 6-17): The Implementation Plan for this BMP is very weak. In addition to site visits, repair and washing operations in Salinas need to be guided by the City on how to reduce their in-house waste from entering a storm drain. Documentation of site visits alone will do nothing to ensure the City's compliance of the NPDES permit.
 - Permit Section VII.h Conduct public awareness surveys: the City states that after it conducts a public awareness survey, the City will "document and analyze results" (SWMP 6-24). This is a very vague implementation plan for an important measurable goal that also needs to be expanded upon. What will the City do with the data it collects? Will the data collected lead the City to improve or add more measurable goals? For a final version of a Stormwater Management Plan, more explanation is needed in this section.
- 4 Although the City states it has hired an educational consultant several times throughout the plan, there is very little curriculum instructions or details on how the City intends to promote water conservation and reduce urban water runoff to its youngest residents. The plan should include descriptions of classroom visit activities and activities students will be engaged in during in-classroom presentations. More details about what exactly the City is promoting about its watersheds to its students needs to be included in the SWMP.
 - 5 Additionally, the City of Salinas should include more ways for all of its citizens to become engaged in stormwater management. The City of Monterey has successfully launched several efforts for citizen awareness and participation such as the First Flush program. Salinas can benefit by heightening its citizen participation in this effort by creating programs and educational campaigns similar to those adopted by the City of Monterey.

Element Seven addresses Commercial and Industrial Facilities. In addition to the continuing theme of vague language and unclear measurable goals, the City altogether avoids any specific guidelines for addressing industrial facilities that engage in agricultural production. Although the City includes recommended strategies and required BMPs for this Element, the guidelines for inspection are altogether too brief. According to this stormwater management plan, there are no adherence guidelines for facilities whose primary production is agriculture. This is alarming since agriculture looms above all other sources of revenue for the City. While adhering and complying with the NPDES permit is a framework for designing a stormwater management plan, cities such as Salinas whose primary industrial facilities engage in agricultural production need to include specific additional measures to address stormwater management for this industry. Moreover, inspection guidelines for commercial and industrial facilities are also very vague. "The City will inspect a minimum of 20% of these facilities each year, commencing after the fourth year of the permit" (SWMP 7-6). This statement seems illogical as the City has had its

permit for 2 years yet it is waiting an additional 4 years before it embarks upon construction site inspections. We find this section entirely inadequate for a final version and in need of much greater detail.

Element Eight-Illicit Discharge and Illegal Connection is well written and includes adequate measurable goals but the City could benefit by collaborating with the City of Monterey on training materials for municipal staff to use while conducting inspections. Monterey has adequate inspection resources that can be of use to the City of Salinas for implementation of Element Eight.

Element Nine addresses Monitoring and Water Quality Testing, the City of Salinas has used the Quality Assurance Project Plan (QAPP) as "a means to protect water resources" and that "this collaborative approach fosters the sharing of data with other other stakeholders, greater efficiency and effectiveness in terms of data gathering and analysis, and continues the City's effort towards regional watershed management" (SWMP 9-1). This approach should encompass the entire creation of the SWMP and its elements, the City of Salinas should draw upon the experience of the City of Monterey, as it has already written and implemented its own stormwater management plan.

These comments represent scores of hours of review, research, and compilation. Allison Ford and Jeffrey Swartz were the researchers and reviewers for this effort. This document was primarily written by Allison Ford.

It is clear that the submitted plan is inadequate and in need of great improvement. We do NOT feel the plan needs more bulk; it suffers from bulk. We feel it needs fewer pages, fewer words, far fewer BMPs. But the plan needs strategic BMPs designed to achieve specific goals, with linked and spelled out implementation plans, with spelled out measurable outcomes. In the current document it is nearly impossible to track a NPDES requirement to BMP to implementation plan to measurable outcome. Unfortunately, the RWQCB staff table of required changes does not address this fundamental, structural, shortcoming of the Salinas plan. RWQCB approval of such a flawed plan will inflict a serious damaging blow to future storm water plan implementation efforts.

It is our hope that these constructive criticisms be put to use in the improvement of the plan that it might be turned into an adequate working document. Thank you for your consideration.

Sincerely,



Steve Shimek
Monterey Coastkeeper