



California Regional Water Quality Control Board

Central Coast Region



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Secretary for
Environmental
Protection

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October 2, 2007

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Denise Estrada, Maintenance Services Director
City of Salinas
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Mr. Callihan and Ms. Estrada:

CITY OF SALINAS STORMWATER MANAGEMENT PLAN, JUNE 2007 VERSION, REQUIRED REVISIONS AND PUBLIC POSTING

On February 11, 2005 the Central Coast Regional Water Quality Control Board (Water Board) adopted Waste Discharge Requirements for City of Salinas Municipal Storm Water Discharges (Order No. R3-2004-0135, hereinafter referred to as the "Permit"). The Permit specifies requirements to protect the beneficial uses of the waters of the United States. The intent of the Permit is to regulate pollutant discharges, identify and focus on those areas that threaten beneficial uses, and implement Best Management Practices (BMPs) to reduce storm water pollutants to the Maximum Extent Practicable (MEP) as required in Code of Federal Regulations, Section 40, 122.26(d)(2)(iv). The City of Salinas (City) is required to update their Storm Water Management Program (SWMP), and implement the SWMP to meet Permit requirements. The SWMP must incorporate measurable goals and implementation time schedules, and must be available for public review and comment, and is subject to a public hearing by the Water Board, if requested, prior to approval.

This letter provides Water Board staff's final review comments of the June 2007 SWMP.

Background

All Phase II Stormwater permittees, and most Phase I permittees, must submit SWMPs as a provision of Stormwater permit requirements. Attachment 4 of the City's Permit describes the conditions by which the City was required to revise its 1999 SWMP. Section D.2.d and Attachment 4 of the Permit require the City to revise the current SWMP to update and/or include the following major program elements:

- i. Construction Site Management Component
- ii. Development Standards Component

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- iii. Commercial/Industrial Facilities Component
- iv. Municipal Maintenance Component
- v. Illicit Discharge Detection and Elimination Component
- vi. Public Education and Participation Component
- vii. Program Effectiveness
- viii. Legal Authority

Water Board staff are tasked with reviewing all SWMPs to determine whether the plans, when implemented in-full, will meet the MEP standard. To make this determination, staff reads each proposed BMP and associated measurable goals, and other SWMP components to determine whether the permittee has analyzed and is addressing local pollutants of concern and beneficial uses. SWMPs are comprehensive in nature, and must be viewed holistically. A SWMP is judged to meet MEP when the program, in totality, can reasonably be expected to protect beneficial uses and address pollutants of concern, through the sum of the applied BMPs. Conversely, a SWMP will not meet MEP if a substantial number of BMPs or measurable goals are inadequate. For example, BMPs may be inadequate in: 1) addressing known pollutants of concern; 2) being specific enough to be well implemented or tracked; 3) not having measurable goals; or 4) not having measurable goals that demonstrate BMP effectiveness.

Staff Comments on the SWMP and Next Steps

Water Board staff has concluded that the June 2007 Salinas SWMP contains too many weak or missing components to meet the MEP standard. Water Board staff has further concluded that the SWMP will meet the MEP standard if the City makes the revisions in the attached table. The table describes areas of concern, and lists required revisions. Staff will consider the City's and the public's comments in making a final determination that the SWMP meets MEP.

The attached Posting Notice describes the SWMP adoption process. If you have any questions regarding the SWMP adoption process, please contact **Donette Dunaway, (805) 549-3698**, ddunaway@waterboards.ca.gov, or **Dominic Roques, (805) 542-4780**, droques@waterboards.ca.gov.

Sincerely,

for Lisa A. McClann
Roger W Briggs,
Executive Officer

Attached: Table of SWMP Analysis and Required Revisions
SWMP Posting Notice

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