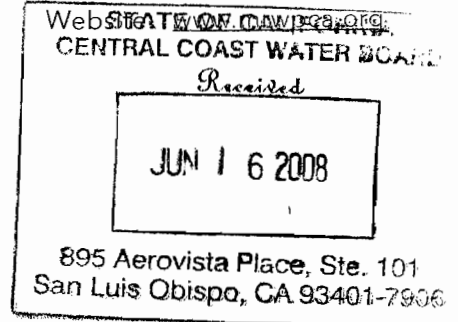


Monterey Regional Water Pollution Control Agency

"Dedicated to meeting the wastewater and reclamation needs of our member agencies, while protecting the environment."

Administration Office:
5 Harris Court, Bldg. D, Monterey, CA 93940-5756
(831) 372-3367 or 422-1001, FAX: (831) 372-6178



June 10, 2008

Mr. Matt Thompson
Storm Water Program Manager
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-5427

SUBJECT: Draft Salinas Stormwater Development Standards, Comments and Requested Revisions

Dear Mr. Thompson:

Monterey Regional Water Pollution Control Agency (MRWPCA) is pleased to present the following comments on the Draft Salinas Stormwater Development Standards for the City of Salinas. Internal review of the document and correspondence with Regional Water Quality Control Board, Central Coast Region (RWQCB) staff has yielded the following comments:

- Page 1-9, 1.5.6. MRWPCA requests that the following paragraph be added to the end of the section: *"No connection to the sanitary sewer for stormwater discharge shall be made without the express permission of Monterey Regional Water Pollution Control Agency."*
- Page 5-2/3, 5.4. MRWPCA requests that the following paragraph be added to the end of the section: *"No connection to the sanitary sewer for stormwater discharge shall be made without the express permission of Monterey Regional Water Pollution Control Agency."*

Item No. 17 Supp Attachment 1
July 11, 2008 Meeting
Salinas Stormwater Mgmt Prog Rev

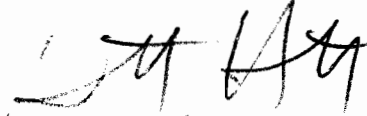
Draft Salinas Stormwater Development Standards Comments

June 10, 2008

Page 2 of 2

MRWPCA is pleased to be working with the City of Salinas and RWQCB staff to develop these Stormwater Development Standards. Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Garrett Haertel', written over a faint horizontal line.

Garrett Haertel, PE
Compliance Engineer

Cc: Matt Keeling – RWQCB,
Keith Israel – MRWPCA
Brad Hagemann – MRWPCA
Michael Ricker – City of Salinas
MRWPCA File

From: Robin Lee <landgaze@hotmail.com>
To: Mthompson@waterboards.ca.gov
Date: 6/17/2008 10:48:58 AM
Subject: RE: Water Board Staff Report re: Salinas Stormwater ManagementProgram Revisions

Hi Matt, I would like to make a comment re Salinas SWMP. I am of the opinion that the plan in hand has not been implemented, in particularly the public education and outreach requirements. I feel the public services department is so underfunded and understaffed that complete implementaion is next to imposible due to their work load created by other responsibilities. I truly feel that educating the public and changing behaviors should be a top priority which it has not been. Unless priorities are changed and the city council takes this process seriously and realize the benefits offered everyone living in the city, the greatest plan in the world would be useless due to lack of implementation. Thanks Robin Leelandgaze@hotmail.com>
Date: Wed, 11 Jun 2008 18:10:16 -0700> From: Mthompson@waterboards.ca.gov> To: chris@ci.salinas.ca.us; daler@ci.salinas.ca.us; denisee@ci.salinas.ca.us; vanessav@ci.salinas.ca.us; meyerb@co.monterey.ca.us; sshaffer@creekbridge.com; gary_shallcross@csumb.edu; landgaze@hotmail.com; traci@montereycfb.com; exec@otterproject.org; kenneth@tunstallengineering.com; DMatthies@WoodRodgers.com> CC: Lmccann@waterboards.ca.gov; Mthomas@waterboards.ca.gov; Rbriggs@waterboards.ca.gov> Subject: Water Board Staff Report re: Salinas Stormwater Management Program Revisions> > Dear Salinas Stormwater Interested Persons:> > Please see the attached staff report regarding recent revisions to the Salinas Stormwater Management Program. This report will be considered by the Central Coast Water Board on July 11 in Watsonville. I will send you an agenda for the July 11 meeting and hard copies of this report by regular mail.> > If you have any questions, please contact me at (805) 549-3159.> > Sincerely,> Matt Thompson>

The i'm Talkathon starts 6/24/08. For now, give amongst yourselves.
http://www.imtalkathon.com?source=TXT_EML_WLH_LearnMore_GiveAmongst

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



June 23, 2008

Chair Young and Regional Water Board Members
Roger Briggs, Executive Officer
Lisa McCann, Environmental Programs Manager
Matt Thompson, Water Resource Control Engineer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906

Via e-mail: rbriggs@waterboards.ca.gov; lmcann@waterboards.ca.gov;
mthompson@waterboards.ca.gov

Re: Required Revisions of Salinas' Stormwater Management Plan

Dear Chair Young, Board Members, Mr. Briggs, Ms. McCann, and Mr. Thompson;

Thank you for the opportunity to comment on the Regional Water Quality Control Board's (RWQCB) Required Revisions of the Salinas Stormwater Management Plan. We have reviewed the revisions and the revised plan thoroughly and would like to offer the following comments.

We would like to begin by very briefly pointing out where we have ended up and how we arrived at this point. Salinas has created a Storm Water Plan that is nearly incomprehensible. I would ask that board members randomly open the document or read a chapter and ask themselves if it is an appropriate storm water guidance document. There are nearly 150 BMPs; instead of choosing BMPs that address contaminants of concern the SWMP wholesale copies entire sections of the CASWQA handbook and offers something for everyone. Measurable goals at times do not relate to the BMP and are so vague as to not be enforceable. Examples would be 1) BMP 6.8.a. Measurable goal: "Number of store visitors and amount of materials taken." While that is certainly measurable, where is the goal? Or the critical Industrial BMPs 7.6.a-h, for permit section IV.f. "Inspect commercial facilities and activities," a measurable goal is "Complete by the end of the 3rd year of the permit term and provide annually." Complete what? Provide what? And finally, we still do not have design standards that are an integral and inseparable part of the SWMP. We have ended up with a 3 year late, incomplete, incomprehensible, and unenforceable storm water plan for the region's only Phase 1 city -- A city that just last month annexed space to build 12,000 new homes.

The City has consistently, through misstatement and omission, misled the Board. Before your Board in February, the City Attorney stated she had no idea where the future growth area projections for 12,000 housing units came from. The projections are in the City's general plan and LAFCO application documents. City staff also stated that there were no design plans or site designs for the future growth area. At your next meeting, I stood in public comment

Item No. 17 Supp Attachment 3
July 11, 2008 Meeting
Salinas Stormwater Mgmt Prog Rev

and waved those plans before you (I would be happy to provide you with copies, they were provided to me by the City). At the City's annexation meeting before LAFCO, LAFCO's staff complimented the City for providing complete plans. And the City stood before you and stated they accepted your wording for public participation and noticing (10 days required and all reasonable efforts made to provide 30 days), yet that repeatedly debated, word-by-word negotiated, memorialized, written, commitment to public process does not appear in the final revision.

How did we arrive? The Regional Board was reluctant and slow to enforce their permit. Staff became trapped in iterative loops. Board or staff was never able to deal with the unreadable/unusable nature of the document the city produced. The permit required Salinas to create a SWMP within 180 days of permit adoption (adoption date was February 11, 2005). 180 plus 30 days later, a Cease and Desist Order (CDO) should have been delivered. It is important to note that staff recommended a CDO at the July 6, 2007 RWQCB meeting, the Board did not concur. With senior staff and Board members reluctant or unwilling to enforce, staff was forced into iterative loops where the city consistently requested that RWQCB staff put their very specific comments in writing. This tactic effectively ignored and bypassed the more general comments offered by stakeholders and Board staff of readability and usability. The City would then give staff 70% of what they wanted, forcing staff and stakeholders into yet another loop. As mentioned above, a specific example of this 70% theme appears in these final changes: Board staff have repeatedly told Salinas that they must provide legally adequate public notice AND make all efforts to provide at least 30 days notice - this was a word by word negotiated required change. No mention of 30 days is made in this final document and Board staff has given up and makes no mention of this in their staff report.

We have all been engaged in a three year exercise to find the least meaningful, least resource protective outcome. The City outlasted us all and today we have a terrible document that does not serve anyone except Salinas City government alone (not the people).

Unfortunately, we feel the need to speak very clearly: Board and Senior Staff reluctance to enforce the conditions of the NPDES permit put us in endless iterative loops spiraling downwards to a terrible and ineffective outcome.

Following are our comments on the required changes. Recognizing the difficulty of the task of producing a workable SWMP, all comments are made with the intention of advocating for the effective implementation of a SWMP by Salinas that will translate into better water quality for the entire Monterey Bay Region.

While we commend Salinas' efforts to revise its SWMP, we have several concerns with the changes made. It is our general opinion that substantial changes must still be made to the SWMP in order for the document to meet the minimum standard that it is expected to achieve. At most, typographical errors have been corrected and wording has been inserted with the apparent intention of meeting the required changes with a minimum of real change. Included we have attached a table of the changes that we feel have not been adequately addressed.

The main errors that were addressed in the required revisions were typographical errors, BMPs that were not matched with measurable goals, and the referencing of documents that were not made available for public viewing, thereby obscuring the plan's intent. The board

also requested that additional BMPs be added. Of these, the typographical errors have adequately been corrected.

Our concern with the revised SWMP includes:

- The continued lack of adequate measurable goals that move forward the implementation of BMPs
- The City's continued reliance on 100% as a measurable goal
- The City's continued resistance to public participation
- The lack of accessibility of key documents.

Given the stipulations of what a SWMP must contain in order to meet the requirements of the NPDES permit, the lack of measurable goals was amongst the most egregious omissions from the original SWMP. An example of this is BMP 6.10 on page 6-16 of the SWMP. This BMP is addressed twice in the RWQCB's Resolution, in item no. 2. a. and item no. 2.i.i. The Board states that the BMP, which addresses the inclusion of quasi-governmental agencies, does not have a goal for creating joint programs with schools. The Board is requiring that a measurable, quantifiable goal is included; to ensure that this is properly done, the Resolution includes an example BMP to illustrate the desired level of specificity. The BMP that is being addressed reads, "Coordinate with local school districts regarding conducting programs aimed at reducing pollutant discharges." The corresponding Implementation Plan details, "Conduct joint programs with Salinas school districts. This program will stencil inlet and employ other interactive educational programs...continue joint educational outreach with SVSWA; expand collaborative efforts with BFI, such as providing bill-stuffer educational materials." (Salinas SWMP p. 6-16) The measurable goal that is added addresses only the stenciling program and it does so peripherally at best. The goal specifies how many schools will be targeted and that supplies will be provided. No further information is given about the other interactive educational program. Unfortunately supplying elementary school with paint and stencils does not illustrate an obvious translation into storm water reduction runoff. It seems that the City chose to tag on the simplest numerical goal rather than the most effective indicator of achievement.

Another example of the City's failure to set forth adequate goals is seen in Required Revision no. 2.m.m which addresses BMP 6.15b. This revision states that the measurable goal for 6.15b was removed, and must be added. The Board gives a very specific example of the detail required of the goal. The example shows incremental progress towards the implementation of the BMP in full, reflecting a realistic progression of events. In turn, the measurable goal that Salinas sets is 100% in each instant that a quantitative measure is required.

The continued usage of 100% as the only metric for success in implementing BMPs is little more than a nod towards the official requirement that goals be quantifiable. The idea behind outlining measurable goals is to evaluate progress towards meeting the overall objectives set forth by the BMPs. While 100% is an idealized goal that of course the city should strive towards, it does little to guide the implementers of this plan towards realistically managing the actual tasks that will allow these goals to be met. In this situation, Salinas obeys the letter of the law—100% is quantifiable, and can be measured. However the result of this is

little more than a shell of a plan that does nothing to help guide the implementation of an effective SWMP that will actually have the real effect of minimizing stormwater runoff.


Lastly, we feel that the SWMP still reflects a continued resistance towards public participation in spite of the Board's efforts to ensure that documents are accessible and that the public is given adequate time to comment on new documents. In response to the requirement that all public documents be cross-referenced, Salinas tends to include no more than the physical address where the documents can be accessed. The Board specifies that the documents should be made available on the web whenever possible, to allow for maximum ease of access. This reflects the notion that it is not adequate merely to make documents available, but that the public must be aware that they are available, and encouraged to participate in the public process.

This attitude is further reflected in the Board's required revision no. 2.a.a.a. Although the NPDES permit only requires that the city give the public a minimum of ten days to comment on documents, the RWQCB states that the City must make "all reasonable attempts" to provide the public with 30 days or more to comment on documents related to stormwater or riparian protection. The revised SWMP does not include this language, nor does it include the additional BMP that the Board has asked be included. Rather the requirement for public access to documents is tagged on to BMP 6.18 in the capacity of a measurable goal (which it is not). It also fails to include the language specified by the Board to ensure that all reasonable efforts are made to engage the public. It is simply not sufficient to make documents available at City Hall. The public should be noticed by newspaper, website announcements, and direct contact with interested parties, a minimum of 10 days before any action and "all reasonable attempts" must be taken to provide 30 days notice.

It is our belief that the Required Revisions that have been implemented do little to address the fundamental flaws of this document; substantial work remains to be done on it before it will be an effective tool to mitigate the impact of stormwater runoff on water quality. In the spirit of the public process, we hope that you will consider our continued concerns.

Thank you for the opportunity to comment.

Sincerely,



Steve Shimek
Monterey Coastkeeper
Monterey Coastkeeper is a program of The Otter Project

Attachment: Comments on Required Revisions

**The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the
Salinas Stormwater Management Plan
June 23, 2008**

	Resolution No.	SWMP Section	Page No. in original copy	Page No. in new copy	Required Revisions	Notes on revision
1	2.a.	BMP 6.10	6-16	6-17	Goal is not measurable	<p>Although the goal is now technically measurable, it is not appropriate to the entire BMP. Stating that a certain number of schools will be provided with materials to stencil drains does not necessarily achieve the stated practice of coordinating with local school districts regarding conducting programs aimed at reducing pollutant discharges. The Implementation Plan further references other organizations such as SVSWA and BFI, as well as stating that educational materials will be provided. No specific details on the nature of these outreach programs, the type of information that will be provided through educational materials, or how the success of any of these programs will be measured and integrated into the larger purpose of achieving better water quality through stormwater management. Giving schools paint and stencils does not adequately achieve any of these goals, other than attaching a "measurable" quantity onto an inadequate plan as a nod to the Board. Has a measurable goal been set? Yes. But what does it actually measure? Certainly not the success of the Implementation Plan or BMP.</p>

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan
 June 23, 2008

2	2.b.	BMP 6.11 and 6.17	6-17	6-17, 6-18	<p>Incorporate survey results to show how they will be used to improve stormwater program</p>	<p>The implementation plan for this BMP has been modified to include residential as well as commercial car washing and activity; while this has been done in line with the Board's request in required revision 2.n.n., the measurable goal does not adequately measure any of the activities set forth in the plan. The goal is to document site visits per year (how many site visits?) and to report findings in the annual report. There is no indication of how survey results will be incorporated other than to say that they will be, and refer the reader to another BMP. While the level of detail as to the implementation of this BMP is commendable, it is necessary that corresponding measurable goals be established. What number of citizens will be targeted in the outreach program? How many informational seminars will be held? How many site visits will be made? There is still no explanation as to how the survey results will improve the stormwater program. This has not been adequately revised.</p>
3	2.c	BMP 6.15.a and b	6-19 and 6-20	6-22	<p>Educational materials referenced must be included or made available for viewing.</p>	<p>As is the case for many cross-referenced documents, the documents can only be viewed in person at the physical location. The Board specifies that documents should be posted on the website whenever possible, however this is rarely done. It seems that the city is resistant to making documents available for public viewing; although they comply at the minimum level, they seem to do so grudgingly. In the spirit of encouraging public review and participation, Salinas should make every effort not only to make the documents publicly available, but to publicize their availability, and allow for ease of access.</p>

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan

June 23, 2008

6	2.k	SWMP p. 5-7	5-7	5-7	<p>SWMP must state the protocol and city department which will determine or interpret construction site or development issues.</p>	<p>Although the SWMP notes that The Development and Engineering Services and Maintenance Service Departments are responsible for conducting inspections, no issue of protocol is included. It appears that no change has actually been made in response to this request.</p>
7	2.p	BMP 3.1	3-26	3-26	<p>The measurable goals have no measurable quantities</p>	<p>The goal that is included to make up for the lack of measurability is "ensure that 100% of all relevant projects are identified within the Implementation Plan column to the left; report results annually as part of above." This is not a measurable goal. How is the City going to ensure this? What actual steps will be taken? How will this actually reduce discharge to downstream receiving water? Although 100% is, to be literal, measurable, to ensure that 100% of something will be done is the equivalent of saying, "we'll do it, we promise". While this assurance is heartening, it is not reflective of the principal behind the permits requirement that measurable goals be included, which, according to the EPA, is "to evaluate the effectiveness of individual control measures and the stormwater management program as a whole." (http://cfpub.epa.gov/npdes/stormwater/measurablegoals/index.cfm)</p>

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan
 June 23, 2008

8	2.u	BMP 3.14	3-37	3-40	<p>1) References SWPPPs which are not available.</p> <p>2) Implementation Plan uses criteria that are based on safety and not water quality, 3) observation schedule needs to include quarterly observations at a minimum.</p>	<p>The SWPPPs have been included as appendix F. As for part two of the revision, this section exemplifies the fundamental inadequacies of the SWMP. First, it is convoluted, unclear, and references other documents in a way that distracts from the idea of what exactly is supposed to be accomplished. Second of all, safety is still listed as the number one priority, and the only immediate potential for concern, whereas environmental quality (water quality is only mentioned as a subset of this) is a "potential for future concern". Lastly, observation schedules are still only vaguely referenced. Although it is included as required that at a minimum quarterly observations will be conducted, the terms of these observations remain vague. Whether or not certain sites may pose an impact to downstream water quality is left to the discretion and "professional judgment" of the site manager and division team.</p>
---	-----	----------	------	------	--	---

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan
 June 23, 2008

9	2.y	BMP 3.29	3-53	3-59	<p>No goal is included to actually reduce pesticide usage.</p>	<p>There is still no measurable goal. The plan references the "measurable goal" in BMP 3.19, which we have determined is not measurable. Nor does it actually address the BMP. First of all, the BMP is unclear. There seem to be about 4 BMPs packaged into BMP 3.29--The BMP or activity is to 1)select and handle BMPs; 2) report quantity and type of chemicals used; 3) Reduce or eliminate unsafe practices regarding handling, application and storage of chemicals; 4) reduce dependence on upon potentially hazardous chemicals through increased application of IPM. The implementation plan for this amalgam of practices is to train staff on the county codes. There is no specific information on the training, the codes, the relevant staff, or how any of this non-information relates to the amalgam of BMPs. The measurable goal is a) not measurable and b) not much of a goal. It doesn't address any of the issues in the BMP(s).It is in fact, not even written for these BMPs, but for BMP 3.19. Even if it was adequate to measure any of these practices and plans, it is thoroughly discounted by the phrase, "whenever conditions, manpower and budget allow." There is still no indication as to how this will actually reduce pesticide usage.</p>
10	2.f.f.	4.D Development Design Standards	4-12	4-12	<p>Change wording to say "A Development Design Standards Plan for LID implementation in new and re-development.</p>	<p>The new wording says: "A Development Design Standards Plan for LID implementation in new development and significant re-development". This is not the wording that was requested, and could have consequences beyond what the Board intended. For example, what is considered a significant re-development, and who makes this decision according to what protocol?</p>

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan
 June 23, 2008

11	2.i.i.	BMP 6.10	6-16	6-16	The goal is not appropriate to the BMP; it is also not specific enough.	See The goal is now quantifiable, however does not really address the BMP--the goal has schools being stenciled, however the BMP addresses preparing public agency staff with tools to safely respond to HAZMAT emergencies as well as coordinating with local school districts regarding conducting programs aimed at reducing pollutant discharges. The implementation plan is equally irrelevant to the goal--although it does address stenciling inlets, it also mentions employing other interactive education programs. It refers the reader to BMP 6.13. which further discusses the stenciling of inlets. There is no mention of any actual educational program. This goal is the only measurable goal in the section (other goals make vague reference to Numbers of events or people, but do not actually provide any of these "numbers") and it is not appropriate to its BMP.
12	2.n.n.	BMP 6.17	6-17 and 6-24		The same BMP appears twice.	This BMP seems to have disappeared entirely.
13	2.r.r.	p. 7-4 C	7-4	7-4	The plan needs to include a link to cross referenced documents, or a way that readers can view it.	This has not been done: Industrial Inspection Guidance Manual 2000 is not linked/shown how it can be viewed

The Monterey Coastkeeper's Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan
 June 23, 2008

14	2.a.a.a.	Whole SWMP, Element 6 in particular	non-existent	6-30	<p>The permit requires that the City ensure that the public has ample time for review of public documents. The Revision requires that the city make all reasonable attempts to provide a 30 day or more public notice and opportunity to comment on stormwater related or riparian protection related documents prepared for city council adoption....please see Resolution item no. 2.a.a.a. for full stipulation.</p>	<p>No additional BMP has been added; instead BMP 6.18 has been inappropriately modified to include stipulations for at least 10 days of public review for stormwater or riparian protection related ordinances, standards and modifications. First, the City inserted this language in the "Annual Report" permit section narrowing the application to only the annual report, not "public review for stormwater or riparian protection related ordinances, standards and modifications." Next, the Required Revisions explicitly state that the City is required to add this as a BMP, which means that an implementation plan and measurable goals must be established-- this is not a measurable goal itself. Secondly, the city has pared down the well intentioned reasonable attempt to allow the public 30 days or more to review and comment on relevant documents, to the bare minimum of "at least 10 days". Although the permit has legally required a 10 day public review period at a minimum, the Board has specifically required that the City include language that illustrates that all reasonable attempts will be made to allow for a review period of 30 days or more. This has not been done; therefore this required revision has not adequately been made. Salinas' unwillingness to properly follow this revision further illustrates the resistance that the City has shown regarding public participation in the stormwater management process.</p>
----	----------	-------------------------------------	--------------	------	---	---

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



June 23, 2008

Chair Young and Regional Water Board Members
Roger Briggs, Executive Officer
Lisa McCann, Environmental Programs Manager
Matt Thompson, Water Resource Control Engineer
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401-7906

Via e-mail: rbriggs@waterboards.ca.gov; lmcann@waterboards.ca.gov;
mthompson@waterboards.ca.gov

Re: Public involvement in the creation of the Salinas Storm Water Management Plan and Development Standards

Dear Chair Young, Board Members, Mr. Briggs, Ms. McCann, and Mr. Thompson;

Mr. Briggs has asked me to comment on the process and public involvement in creating the Salinas Storm Management Plan and Development Standards.

Before commenting on Salinas' actions, I would like to mention that we are all culpable for what I believe is a poor outcome to date.

As previously mentioned in another comment letter, I believe Board and Senior Staff reluctance to enforce the February 2005 conditions of the NPDES permit put us into endless iterative loops spiraling downwards to an ineffective outcome.

I also believe staff's arbitrary application of the February 2008 resolution approving the SWMP, ignoring Dr. Press' amendment to the resolution, has added confusion and uncertainty. Dr. Press' amendment created a set of items to be "reopened" in the July meeting including: design standards, the 54 required changes to the SWMP, and public involvement. To deal with each item differently, appears arbitrary.

- 1) The Board is soliciting public comment and holding a public hearing on the design standards;
- 2) Staff has offered a select group of 'interested parties' the opportunity to give written comment on the 54 required changes to the Storm Water Management Plan but has apparently not officially opened the changes to comment or testimony (no Lyris notice and no notice on the RWQCB Website);
- 3) Mr. Briggs has offered me the opportunity to comment on public involvement but I know of no one else solicited for comment.

I understand and concur that upon listening to the taped transcript it is unclear how each item is to be dealt with or what "reopener" really means; but that is exactly why I feel the three items should have been dealt with in the same consistent manner.

And for my part, I have not met with RWQCB staff as I should. Monterey Coastkeeper has the exact same goal as the Water Quality Control Board. We should be on nearly the same page.

Coastkeeper will likely be less patient, a little tougher, push harder for the 'ideal,' and will likely use rhetoric more freely -- that's our job. But we should be striving for the same objective. It is critical for me to find ways to communicate more frequently and more effectively with staff -- including senior and executive staff. I commit to better communication with staff.

I offer the following observations and comments as a member of the Salinas NPDES Stakeholders Committee. I want to make it very clear that I do not speak for the Committee, only as an individual member of the Committee.

The Committee was formed in July of 2007 in response to members of the public expressing concerns to the City Council over the integration of the Storm Water Ordinance, Grading Standards, Storm Water Management Plan, and Design Standards.

City staff did not constitute or convene the Committee until October 1, 2007. I was unable to attend this first meeting.

The second meeting was October 17th, 1:30 to 2:30 pm. No agenda was provided and no action items were flagged. The Committee was told there would be some discussion of the CASQA standard. We were told it was not necessary to review documents in preparation for the meeting. After the adjournment time and after some City staff (Rob Russell) and I had left, other City staff called for a vote on adoption of the CASQA standards as the basis for the Salinas Standards.

In 2007 the Committee met four more times: November 5, 19, December 3, and 10. At each meeting (never in advance) we were given hard copies of a section of the Design Standards and asked to comment. At some meetings a section might be returned with some comments incorporated, others not. We were never given, nor did we ever review, a complete set of Standards before they were submitted to the Regional Board on December 31, 2007.

In very early January one member of the Committee, Traci Roberts, heard that the City had submitted the Standards to Kennedy-Jenks Consultants for review and she asked for a copy of that review. She was denied. I asked for a copy and was never responded to. I submitted a Public Records request and was again denied. Nearly two months after the first request, the Committee was given a link to a red-lined set of Standards; we were never given the cover letter from Kennedy-Jenks or any other supporting documents.

In 2008, the Committee met three times. On January 14th we reviewed the already submitted Design Standards and were told there was no need to meet again until the Regional Board staff offered comments.

We did not hear from the City staff for many weeks. I sent email suggesting we needed to meet to revise the Design Standards. I met with City staff on March 5 and outlined both an approach and a schedule to revise the Standards before the new May 19 deadline. In late April the City responded that the Committee could meet on May 19th, the very day the revised Standards were to be submitted to the Regional Board.

When Committee members objected and asked to review the Standards BEFORE they were submitted, we were told: "So that the Stakeholder Committee has an opportunity to provide comments and input to City staff on the revised Storm Water Development Standards before they are submitted to the Regional Board, we would like to schedule a meeting for Monday May 5, 2008 from 1:00-3:00 in the City's West Wing Conference Room. Kennedy/Jenks has indicated they are available to participate in that meeting as well."

When the Committee all arrived on May 5, we were told that the Standards were not ready and there was no draft to review.

It is my personal opinion that the Salinas NPDES Stakeholder Committee has been deliberately managed to be ineffective. Leading into submittal deadlines we were either given only partial documents or no documents at all. After the submittal deadline a meeting is scheduled and we are given ample opportunity to offer comments.

Salinas' recalcitrance to meaningfully engage the public is also reflected in their Storm Water Management Plan submittals. Regional Board staff has consistently advocated for good public process and 30 days public notice. Public involvement was heavily negotiated by Board staff and the City before the February approval meeting. Exact and precise public participation BMP language was negotiated and appeared as a Supplemental for the RWQCB February meeting. The City publicly stated they had agreed. The agreed upon language does not appear in the revised SWMP. And, the (partial) BMP agreeing to the minimum 10 day notice is as a section addressing only the "Annual Report" so it does not reflect the intent of the negotiation to fully engage the public.

The City of Salinas has not negotiated or engaged the public in good faith.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Shimek', written in a cursive style.

Steve Shimek
Monterey Coastkeeper
Monterey Coastkeeper is a program of The Otter Project



City of Salinas

Office of the City Attorney - 200 Lincoln Avenue, Salinas, California 93901 - (831) 758-7256 - Fax (831) 758-7257

Vanessa W. Vallarta, City Attorney
Susan J. Matcham, Asst. City Attorney
Christopher A. Callihan, Sr. Deputy City Attorney
Georgina B. Mendoza, Deputy City Attorney

July 1, 2008

Allison Ford, Program Associate
Monterey CoastKeeper
3098 Stewart Court
Marina, California 93933

Re: Required Revisions of Salinas's Stormwater Management Plan

Dear Ms. Ford:

This letter is written in response to your letter dated May 7, 2008, in which you provide comments on the City of Salinas's Stormwater Management Plan (SWMP) and the Central Coast Regional Water Quality Control Board's (Regional Board) Required Revisions thereto. While your letter does not indicate as much, we will assume that the references in your letter to "Required Revisions" mean those included in the Regional Board's "Final Table of June 2007 SWMP Required Revisions" included in Attachment A to the Regional Board's February 8, 2008 Resolution No. R3-2008-0012.¹ If our assumption in this respect is incorrect, please let us know.

While your specific comments are included in a three-page letter and a nine-page document titled "Comments on the Implementation of the RWQCB's Required Revisions of the Salinas Stormwater Management Plan," generally you make four comments, each of which is listed below with the City's response immediately following.

Comment 1.

"The continued lack of adequate measurable goals that move forward the implementation of the BMPs."

Response 1.

To begin, with these responses to your comments, the City in no way stipulates as to "what a SWMP must contain in order to meet the requirements of the NPDES permit." A discussion of the legal requirements for a SWMP is well beyond the scope of this letter and of your comments.

¹ For purposes of this letter, all references to the "Required Revisions" are to those included in the Regional Board's "Final Table of June 2007 SWMP Revisions" included in Attachment A to the Regional Board's February 8, 2008 Resolution No. R3-2008-0012.

As you may be aware, on February 8, 2008, the Regional Board approved the City's SWMP as being in compliance with the City's NPDES Permit, subject to the City's incorporation of Required Revisions. The City incorporated all of the Required Revisions and submitted a complete, revised SWMP to Regional Board staff on April 8, 2008, with the exception of two of the Required Revisions which were inadvertently not included in the April 8, 2008 revised SWMP. On May 1, 2008, Regional Board staff informed the City that all the Required Revisions were adequately incorporated into the April 8, 2008 SWMP, except for two which were missing or which could not be identified in the SWMP (Required Revision 2.i and Required Revision 2.j)². Thereafter the City further revised the April 8, 2008 SWMP to incorporate the two missing Required Revisions. By e-mail dated May 12, 2008, Regional Board staff indicated they had reviewed revisions made to the SWMP to address these two missing Required Revisions.³ And, on May 20, 2008, the City submitted the further revised April 8 SWMP for Regional Board staff consideration. On May 21, 2008, the further revised April 8 SWMP was posted on the City's website and members of the City's NPDES Stakeholders Committee, including the Executive Director of the Monterey CoastKeeper, Steve Shimek, were informed of the document's availability. The City did not receive any comments following its May 20, 2008 further revised SWMP. Regional Board staff have concluded the May 20, 2008 further revised SWMP incorporates *all* the Required Revisions, is in compliance with the City's NPDES Permit, and recommends the Regional Board approve an order to finalize the City's SWMP.

Comment 2.

"The City's continued reliance on 100% as a measurable goal."

Response 2.

It is difficult to reconcile your first comment with this comment. On the one hand, in your first comment you suggest the City's SWMP lacks measurable goals, yet in your second comment you fault the City for its commitment to 100% implementation of its BMPs even though you acknowledge that "100% is quantifiable, and can be measured." Nevertheless, with respect to your comments about the City's "continued usage of 100% as the only metric for success in implementing BMPs," we disagree with your conclusion that the goal of 100% implementation "does little to guide the implementers of [the City's SWMP] toward realistically managing the actual tasks that will allow these goals to be met." In fact, as you mention, "100% is quantifiable, and can be measured," and represents the City's commitment to full compliance with the SWMP and full implementation of the BMPs identified therein.

Comment 3.

"The City's continued resistance to public participation."

² A copy of the Regional Board staff's May 1, 2008 e-mail, with attachment, is attached here as Attachment A for your reference.

³ A copy of Regional Board staff's May 12, 2008 e-mail is attached here as Attachment B for your reference.

Allison Ford, Program Associate
Re: Required Revisions of Salinas's Stormwater Management Plan
July 1, 2008
Page 3 of 4

Response 3.

Your comment pertains to the availability of documents referenced in the City's SWMP. Your comments suggest that even though the City has listed either the physical address or the web-address at which the various documents listed in the City's SWMP may be accessed, the City's efforts amount to a "continued resistance toward public participation."

To be clear, the Regional Board's direction to the City and the City's efforts in this regard are different than you represent and characterize in your comments. Specifically, please refer to the Regional Board's Required Revision 2.aa, provided for you here in its entirety:

Include all cross-referenced documents in the SWMP, or all documents will be posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for public viewing in the SWMP.

The City has complied with the Regional Board's direction as set forth in this Required Revision: the documents referenced in the SWMP are either included in the SWMP, posted on the City's website with the web-address included or made available at one of the City's departments with the physical address listed in the SWMP. Through these three mechanisms, the City has made *all* referenced documents available for any interested person to view. Those documents which are not posted on the City's website or which are not otherwise made available electronically, are made available at one of the City's physical locations because electronic availability is either not possible or practicable. This is the situation, for example, with those documents the City considers proprietary, to otherwise contain confidential information or otherwise to contain information the release of which would present a threat to the public health, safety, and welfare. Those documents are available for inspection, but will not be made electronically available, otherwise they may be copied and reproduced and the confidentiality and proprietary nature thereby destroyed and the public health, safety, and welfare compromised.

Further, and in response to your comments relative to Required Revision 2.aaa, the City has *in fact* provided at least 30-days public review of storm water related documents. Both the April 8 2008 SWMP and the May 20, 2008 SWMP were posted on the City's website for 30-day public review.⁴ Additionally, the City's Storm Water Development Standards were posted for a 30-day public review period which began on May 19, 2008.⁵ So, while BMP 6.18, as you indicate,

⁴ A copy of my April 8, 2008 and May 21, 2008 e-mails, directed to the attention of the City's NPDES Stakeholders Committee, including the Monterey CoastKeeper's Executive Director Steve Shimek, are attached as Attachment C for your reference.

⁵ A copy of the home page to the City's website, showing the City's posting of the document, is attached as Attachment D for your reference, as is a copy of my May 20, 2008 e-mail to Monterey CoastKeeper Steve Shimek, Deputy City Engineer Carl Niizawa's May 21, 2008 e-mail to Mr. Shimek and to Regional Board Executive Director Roger Briggs, and Sr. Civil Engineer Dale Rosskamp's May 20, 2008 e-mail to the City's NPDES

Allison Ford, Program Associate
Re: Required Revisions of Salinas's Stormwater Management Plan
July 1, 2008
Page 4 of 4

requires only a 10-day public review period (in a manner consistent with the City's NPDES Permit), in practice the City's has allowed 30-day public review for *all* storm water related documents it has considered since January 1, 2008.

Comment 4.

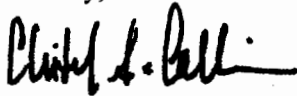
"The lack of accessibility of key documents."

Response 4.

Please refer to Response 3, above.

We appreciate receiving your comments. Please let us know if you have any questions.

Sincerely,



Christopher A. Callihan
Sr. Deputy City Attorney

CAC/ns

Enclosures

cc: Deputy City Engineer
Senior Civil Engineer
Maintenance Services Director
Water Resources Planner
Roger Briggs, RWQCB
Lisa McCann, RWQCB
Matt Thompson, RWQCB
Frances McChesney, RWQCB
NPDES Stakeholders Committee

Stakeholders Committee, including Monterey CoastKeeper Executive Director Steve Shimek, attached hereto as Attachment E, Attachment F, and Attachment G, respectively.

Attachment A

Christopher Callihan

From: Matt Thompson [Mthompson@waterboards.ca.gov]
Sent: Thursday, May 01, 2008 5:07 PM
To: Christopher Callihan
Cc: Lisa McCann
Subject: Revisions to Stormwater Management Plan[Scanned]



Salinas Stormwater
Management ...

Good afternoon Chris,

I have reviewed the revised Stormwater Management Program that you submitted on April 7, 2008. I reviewed it to ensure you incorporated all the revisions required in the Water Board's February 2008 resolution. I was able to find in the SWMP all of the required revisions except two, one of which is substantive. Attached is the list of required revisions from the Feb 2008 resolution, with those revisions I could not find denoted in red font. Before I jump to conclusions, I'd like you to have the opportunity to show me in the SWMP where these revisions are. Its a very large document and it's quite possible that I missed them. Please respond within one week and point out to me which sections these revisions are located.

If you did not include these revisions, I trust it was a mistake, and I ask that you submit a revised SWMP within one week that includes these revisions.

Thank you for your attention to this important matter.

Sincerely,
Matt Thompson

Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

V (805) 549-3159
F (805) 788-3572

Note: Central Coast Water Board staff reviewed the revised City of Salinas Stormwater Management Plan on April 30, 2008, to determine whether the City incorporated the required revisions contained in this document. Water Board staff did not find those revisions denoted in red font.

ATTACHMENT A

of

**Board Resolution No. R3-2008-0012
February 7-8, 2008 Board Meeting Item 17**

**Final Table of June 2007 SWMP
Required Revisions**

Acronyms:

- BMP - Best Management Practice
- MG - Measurable Goal
- SWMP - Storm Water Management Plan
- SWPPP - Storm Water Pollution Prevention Plan

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.a	BMP 6.10	Storm Drain stenciling	SWMP measurable goal is not specific.	Include a measurable goal that states the minimum number of events or students, or groups of students (i.e. 6 th graders, or 50% of Junior High students) that will occur or participate in the stenciling event.
2.b	BMP "6.11 and 6.17"	Public survey results	SWMP must explain how survey information will be used to improve the storm water program.	Include requirements for the City to utilize public survey information to modify, improve, or verify the applicability of the current BMPs.
2.c	BMP 6.15a and b, pg. 6-20	Public outreach	SWMP indicates the education materials were developed in Year 2 (i.e. 2007). SWMP must include the documents it cites, or cross reference the location where a reviewer can see the documents.	Include references to, or the actual material described in BMP 6.15a and b.
2.d	BMP 3.31	Pesticide	SWMP must more specifically	Modify BMP to describe the final destination of the

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.e	Applies to all sections of the SWMP	BMP Permit year references	explain how the BMP will be implemented. SWMP reference to implementation years needs to be linked with actual calendar years.	pesticide tanks residue. Define the numerical permit years (ie. Year 1, Year 2...) in the Summary of Best Management Practices tables, in terms of calendar years, with Permit Year 1 being 2005.
2.f	BMP 3.4	Public education and outreach	The current BMP must include methods for City staff's knowledge of storm water problems, to be translated into storm water program improvements.	Add wording that meets the following intention: "The reported information will be used to tailor Public Education and Outreach BMPs in future years. The lessons learned and City-responses or planned City-responses to lessons learned will be included in the Annual Report."
2.g	BMP 3.13	Illicit discharge	SWMP must cross reference the location where a reviewer can see the cited document. Current BMP wording is unrealistic; wording needs modification to accurately reflect an achievable action.	Add "The City staff will respond to 100% of the reported spills, using the Spill Convention and Response Plan (SCRPP)". The SCRPP plan must be included in the SWMP, or referenced in a manner the public can access.
2.h	Applicable General Plan and Zoning Code citations	Cross references	SWMP must include the documents it cites, or cross reference the location where a reviewer can see the documents.	Include the specific General Plan and Zoning Code citations that support Smart Growth principles.
2.i	Development (Element 4) Standards and/or Construction Site Management (Element 5).	Riparian zone protection	SWMP must include a BMP for riparian zone protection which aligns with the Basin Plan's 30-foot setback from watercourses, and also with the City's current General Plan policy COS-17.	See "Required Revision for Resolution 2.i" at the end of this table, below.
2.j	Development	Riparian zone	SWMP must explicitly show which	Link SWMP BMPs with the SWMP stated objective

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.k	Standards and/or Construction Site Management SWMP page 5-7	protection	BMPs support the SWMPs objective of, "protect waterways and stabilize drainage ways".	of "protect waterways and stabilize drainage ways" (SWMP pg. 5-4).
2.l	BMP on page 4-30. No BMP number given	Development Standards	SWMP must state the protocol and City department which will determine or interpret construction site and development issues.	Include the protocol and party responsible for determining or interpreting disputed high- and low-priority construction sites, and tenant improvement designations
2.m	SWMP citation of Permit Section Ve	Zoning Code	SWMP must provide a more defined date for Zoning Code revisions.	Provide a date-certain for Zoning Code revision. If the due date is later than 2008, include justification for the date.
2.n	Introduction	Permit language	SWMP citation must properly quote the Permit citation.	Match Section V.e. citation to the Permit language, "Implement appropriate requirements for pesticide, herbicide, and fertilizer applications."
2.o	Applies to all sections of the SWMP	Specific work items	SWMP is missing a description to the reader that the tables contain the specifics, while the text provides detailed background and context for BMP. Additionally, the tables are the equivalent of the Work Plan which is required by the Permit (per City Attorney's statement to this effect at 2007 Water Board public meeting).	Add wording to the effect that, "specific work items and goals are included in the tables in each section. BMPs will implement provisions described in the text. The text is provided for background, intent, and/or additional information as needed on chosen BMPs and programs."
2.p		Due dates for BMPs	1. Many of the BMPs do not have time frames indicating which year they will be completed. Some BMPs have due dates that	1. Include an easy-to-locate description of when BMPs will be fully implemented. This may be accomplished by adding a Timeline column to each BMP table in the Elements, with a corresponding

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.p	BMP 3.1,	Stenciling, signage of Drainage inlets	reference "Year 'X' ", but this needs to be defined in relation to actual years. 2. The SWMP is intended to cover the 5-year permit term. The SWMP tables are intended to be the City's Work Plan for the upcoming year (per City Attorney's statement to this effect at 2007 Water Board public meeting).	due date given with each BMP, or by providing a blanket statement such as, "All BMPs contained in this document will be fully implemented by February 2010 (end of 2 nd permit term), unless otherwise explicitly stated. "Year one" of the due dates is considered to be February 2005 – February 2006", or other method. 2. Add a statement or BMP stating that City will submit updated tables each year with the Annual Report; the tables will serve as the City's Work Plan; any changes to the current tables will be prominently marked on the newly-submitted table. See "BMP specificity example" at the end of this table.
2.q	BMP 3.5	Drainage inlet hot spots, Repair schedule in Annual Work Plan (which year?)	The measurable goals have no measurable quantity. The SWMP does not have a schedule in BMP 3.4 but refers to a "Repair" schedule.	In either BMP 3.4 or 3.5, add: all documents referenced in the SWMP will be posted to the City website, and the full web address provided in the SWMP at the place of document reference, or in a table of references for the entire SWMP. If electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for public viewing in the SWMP.
2.r	BMP 3.2, 3.3	Municipal Maintenance: Inventory and Map Plan		All documents referenced in the SWMP will be posted to the City website, and the full web address provided in the SWMP at the place of document reference, or in a table of references for the entire SWMP. If electronic posting is not possible or not practicable, then documents must be available for public review and the method and location for public viewing must be described in the SWMP.

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.s	BMP 3.12	Typographic error	The wording in the Implementation Plan should read, "...scheduled as part of regular maintenance/repair..."	Correct typographic error.
2.t	BMP 3.12b	Inspect City-owned properties for SWMP and NPDES compliance	Document in "report", but unclear on what report is referenced.	Specify that reporting will be included in the Stormwater Annual Report.
2.u	BMP 3.14	Municipal maintenance and repair schedules, SWPPPs and field observations	This BMP 1. references SWPPPs which are not readily available, and 2. uses criteria that are based on safety, not water quality.	1. Include all cross-referenced documents in the SWMP, or all documents will be posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for public viewing in the SWMP. 2. Revise Implementation Plan section of the Table to include <u>water quality</u> as a criterion for repairs and improvements. 3. For observation schedules, include quarterly observations at a minimum. Provide a measurable goal for mulch use.
2.v	BMP 3.17	mulch	BMP does not have a measurable goal of % parks, acreage, or other quantitative goal that the City will mulch.	1. Provide reference where reader can learn more about PHAER program. 2. Clarify what portion of PHAER they City is going to do and why only a portion of the program,
2.w	Pg. 3-19	Pesticide/herbicide Pesticide	1. Poor description of PHAER concept that is referred to like a program. 2. Page 3-19, last sentence limits	

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
		Hazard and Exposure Reduction (PHAER) Zone concept	City's commitment to PHAER. Vague description of what the City will commit to do.	and then can remove sentence, page. 3-19, "Resource limitations will limit the City's ability to implement all of the concepts contained within PHAER". 3. If desired, replace the PHAER wording with a BMP that meets the intent of minimizing pesticide use, but which is more specific than the current language.
2.x	BMP 3.19	Herbicide	BMP does not provide a Measurable Goal.	Provide a quantitative measurable goal, for example: 75% herbicide use reduction by 2009 from 2005 use-levels.
2.y	BMP 3.29	Landscape chemicals	BMP does not include a goal of reduced pesticide usage. Pesticide reduction is needed based on CCAMP findings of high pesticide in receiving waters.	Include quantitative measurable goal related to this BMP.
2.z	BMP 3.33	Typographic error	Best Management Practice should read, "...where run- off may degrade water quality." Implementation Plan should read, "...immediately water-in to prevent downstream pollution or plant burn."	Correct typographic error.
2.aa	BMP 3.35	"Watershed management" training. Film, <i>After the Storm</i> . Field maintenance manuals.	All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP.	Include all cross-referenced documents in the SWMP, or all documents will be posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for

Resolution R3-2008-0012
 Attach. A – Final Table of June 2007 SWMP Required Revisions

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.bb	BMP 3.41	Landscape and building maintenance BMPs	Measurable Goal reads, "...emphasis on reducing environmental/personal injury..." and should read environmental and personal injury to fit with purpose of SWMP. The City should not use personal injury training as credit for stormwater protection training, which is not in keeping with the intent of the program and permit. BMP does not have a measurable goal after June 2007.	public viewing in the SWMP. Change BMP to: "...emphasis on reducing environmental injury..."
2.cc	BMP 3.49	Storm drain stenciling		Add measurable goals with an equivalent level of specificity as the example BMP in "BMP specificity example" at the end of this table.
2.dd	Page 4-17	City's Storm Water Master Plan	All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address SWMP at each document reference location in the SWMP.	Include all cross-referenced documents must be included in the SWMP, or all documents will be posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for public viewing in the SWMP.
2.ee	Sections C, f, g, H, and J beginning on page 4-10	Updating City's Zoning Code, Grading Standards, Storm Water Ordinance, Storm Water Master Plan,	SWMP discusses Kennedy/Jenks review of existing documents as if it is a future event. The consultant released its comments in Technical Memorandum No. 1 (Tech Memo) on Dec. 31, 2006. This information should have been incorporated into this SWMP version, or into	1. Re-word sections to explain that the consultant has already reviewed and commented on the relevant documents. 2. Include Tech Memo as appendix or place on-line and include web address.

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.ff	Pg. 4-12, first paragraph	and City's Standard Specification Document,	Ordinances, Codes, and Standards referenced in the Tech Memo.	First sentence should read, "A Development Design Standards Plan for LID implementation in new <i>and re-development...</i> "
2.gg	Pg. 4-24 "will be considered BMPs" wording in item #1, last sentence, and item #2, first sentence and other places	Development Design Standards	This wording is unclear. Wording must say if these items are required. If these items are BMPs, they should have associated measurable goals	if using wording equal or similar to "will be considered BMPs", add to the SWMP a directive that such BMPs must be followed unless the applicant has clearly demonstrated and documented that such BMP is ineffective or overly burdensome. Add wording that, the City will retain documentation and provide compliance levels for such BMPs in the City's Stormwater Annual reports.
2.hh	Pg. 5-2 and 5-4	Element 5 "three principle Goals", and Construction Objectives	On pg. 5-2, Section 5.2, paragraph 2 the first goal is to develop performance standards and put them into daily practice. Third goal paraphrased says the goal is to ensure program effectiveness. This is unclear how will the City determine whether the actions it is taking are effective in improving stormwater runoff. The Annual Report discussion on effectiveness should answer this, and the SWMP should provide a way to determine effectiveness.	Insert BMPs that measure effectiveness by including a BMP to track and report patterns or trends in site compliance, or varying degrees of compliance, and to analyze the effectiveness of BMPs in Element 5.

Resolution R3-2008-0012
 Attach. A – Final Table of June 2007 SWMP Required Revisions

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.ii	BMP 6.10	Include quasi-governmental agencies	For example, the City should explain how they will track whether the brochures, training, and enforcement are resulting in the City meeting the Construction Objectives. BMP does not have a goal for creating joint programs with schools	Add measurable goal which includes a quantifiable goal, not just reporting the "number of events and/or number of students involved", with an equivalent level of specificity as the example BMP in "BMP specificity example" at the end of this table.
2.jj	BMP 6.13	Storm drain stenciling and signs	1. The measurable goal does not discuss stenciling. 2. The measurable goal does not give specific number or percentage of drains stenciled. The permit also requires the City to outreach to residential auto repair, washing, but it is not clear where that is contained in SWMP? Our basis for concern are the identified Pollutants of Concern, and Permit requirements	Add measurable goal with an equivalent level of specificity as the example BMP in in "BMP specificity example" at the end of this table .
2.kk	BMP 6.11	Homeowner automobile washing	It is unclear how the City will choose the most effective advertising media. (The basis for this requirement is City staff's verbal statement that the City will determine where to effectively advertise.with Arbitron)	Add to Salinas BMP 6.14, "Subjects will include auto repair, auto washing, fertilizer, pesticide and herbicide management, and pet waste disposal."
2.ll	BMP 6.14	Media outreach		Add wording similar to: "Arbitron program will be used to determine market share of each radio station and TV. Arbitron looks at time slots as well as public use."

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.mm	BMP 6.15b	Teacher training	The measurable goal for 6.15b was removed.	Add measurable goal. with equivalent detail as the following example: "In the first year, 10% of teaching staff, representing 25% of all schools in the district will attend. Second year goal is to reach 10% of teaching staff from a new set of 25% of all schools."
2.nn	BMP 6.17 on page 6-24	Public awareness survey	<ol style="list-style-type: none"> When comparing yr. 2 survey against year 5 survey, better to try and hold variables constant to get better comparison. Measurable goal does not address how the City will use the survey information. There is a BMP 6.17 on page 6-17 that differs from the BMP 6.17 on page 6-24. 	<p>In BMP "6.11 and 6.17," include requirements for the City to utilize public survey information to modify, improve, or verify the applicability of the current BMPs.</p> <p>Remove BMP 6.17 from the BMP 6.11 on page 6-17</p>
2.oo		BMP numbering in element 4, 5, and 7	BMPs are hard to reference for discussions/review.	Number all BMPs matching the format used in Elements 3, 6, and 8.
2.pp	BMP "IV.d", page 7-10	"Require BMPs for all industrial and high-risk commercial facilities."	Stormwater Management Plan, Stormwater Ordinance and Grading Standards (Appendix C of SWMP) are referenced, but it is unclear which portions of the documents support the BMP.	Cross reference the section in the Ordinance(s) that supports this BMP.
2.qq	Page 7-4, Section B		Typo in reference in Section B, 3 rd paragraph	Change Section B, 3 rd paragraph to, "...during an inspection described in Section 7.4.a..."
2.rr	Page 7-4, Section C	City's Industrial Inspection Guidance	All cross-referenced documents must be included in the SWMP, or posted to the City website and the full web address provided in the	Include all cross-referenced documents in the SWMP, or All documents posted to the City website and the full web address provided in the SWMP at each document reference location in the SWMP. If

Resolution R3-2008-0012
 Attach. A – Final Table of June 2007 SWMP Required Revisions

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
		Manual, 2000	SWMP at each document reference location in the SWMP	electronic posting is not possible or not practicable, then make documents available for public review and state the method and location for public viewing in the SWMP.
2.ss	BMP 7.8 Implementation Plan	BMP enforcement	Need to link the narrative to the BMP.	Add: "Follow progressive enforcement procedure described in Element 7 narrative and contained within Element 10..."
2.tt	BMP 7.9 Implementation Plan	Non-compliance	First sentence of 4 th paragraph is confusing.	Change to "Determination of "non-compliance" will be based upon a party's not meeting the City's Code of the written requirements, and/or the party's failure to remedy the non-compliant condition."
2.uu	BMP 8.2 Implementation Plan	Salinas Spill Response Plan	Web address for Spill Response Plan is not complete.	Place full web address to Spill Response Plan in the BMP.
2.vv	BMP 8.6 Measurable Goal	Illicit discharge – used oil and toxic materials	Quantitative goals are not included.	Add specifics on when SWSWA partnership will be developed, number of people that outreach will project to reach, and who target audiences are.
2.ww	BMP 8.7 Measurable Goal	Illicit discharge – used oil and toxic materials	Need effectiveness feedback analysis.	Add BMP to analyze trends in illicit discharge activities and analyze whether enforcement mechanisms are effective.
2.xx	Applies to all sections	Permit requires City to measure program effectiveness.		1. Add BMP that: a) the City will create and maintain a list of identified sources of water quality data collected in the City from data currently submitted to the RWQCB as required by other parties' WDR and NPDES permits, Central Coast Ambient Monitoring Data, organized citizen monitoring efforts, and other water sampling if available; and b) The identified data sources will be analyzed as needed to improve characterization of water quality problems when they

Resolution R3-2008-0012
 Attach. A – Final Table of June 2007 SWMP Required Revisions

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
2.yy	Appendix C	Ordinance Amending Chapter 29 of the Salinas City Code Regarding Stormwater Management and Discharge Control	This ordinance is presented as final, however it does not have final signatures.	<p>arise.</p> <p>2. Add to each Element, or include overarching BMP(s) that tracks trends and patterns in actions or outcomes related to the Element(s). Add a BMP to report this information in the annual Report.</p> <p>Replace with the adopted version containing final signatures of mayor and city clerk.</p> <p>Update wording on Page 10-2, section 10.3, 2nd paragraph to indicate final ordinances are included in SWMP.</p>
2.zz	Appendix C	Standards to control excavations, cuts fills, clearing, grading, erosion and sediment (Grading Ordinance)	Standards are presented as final, however version does not match adopted Final version. For example, see Ref. No. 42.	<p>Replace with the adopted version, with final signatures of mayor and city clerk.</p>
2.aaa	Applies to all sections of the SWMP	Public notice and public input	The Permit requires, and the Water Board (in response to written and verbal public comments) has directed the City to ensure the public has ample opportunity for review and	<p>Include in SWMP Element 6, a BMP that requires the following: City will make all reasonable attempts to provide a 30-day or more public notice and opportunity for public comment for stormwater- or riparian protection-related documents prepared for City Council adoption. At the minimum, City will</p>

Resolution Item Number	SWMP Section	Subject	Concern	Required Revisions
			<p>comment on storm water related issues. These issues include, but are not limited to, the SWMP, design standards, ordinances.</p>	<p>provide a 10-day public review period for storm water- or riparian protection-related ordinances, standards, and modifications to the SWMP. The City will provide notice of the availability of such documents by posting on the internet and by direct notice to those persons who have requested notification of such proposed actions. Notice of availability will occur at least 10-days prior to the meeting at which the document is presented for adoption or approval. The City must clearly communicate how public comments were evaluated and used to change documents. The City staff must respond to all substantive public comments in a timely manner in a written format. The measurable goal(s) will include compliance with this BMP, as demonstrated by submittal to Regional Board staff of all public notices on storm water related documents and City Council actions and all City responses to public comments received following posting of such notices.</p>

Resolution Wording continued

Required Revision for Resolution 2.i:

Best Management Practice or Activity

Comply with City of Salinas General Plan COS-17 and the Water Quality Control Plan Central Coast Region (Basin Plan) Section V.G.4.

Implementation Plan

New and re-development projects must comply with the City of Salinas General Plan COS-17 and maintain at a minimum a 30-foot setback whenever possible, consistent with the Basin Plan Section V.G.4. (To be implemented by City planning staff through plan review and approval process, and City construction staff during construction inspections).

"Development" activities include construction, reconstruction, conversion, structural alteration, relocation or enlargement of any structure; any mining excavation, landfill or land disturbance, and any use or extension of the use of land. For this Best Management Practice, "land disturbance" includes clearing, grading, grubbing, and removal of significant vegetation canopy or herbaceous ground cover.

City staff will notify Water Board staff within 15-days prior to the City's approval of projects that do not meet the COS-17 requirement for a 100-foot setback. Notification will include the project name, location, reason for the exception to the COS-17 setback requirement, and City Planner-approved setback (if any) for the project.

Exceptions to the 30-foot setback minimum may be made through application of the City's approval process and based upon consideration of recommendations from a biotic resources study or a hydrology report, or upon a finding that this setback minimum is inconsistent with federal and state law.

Year
3

Measurable Goal

All new and re-development projects within the City's planning area as indicated on Figure LU-1 of the General Plan Land Use Element will conform to General Plan COS-17, and at a minimum will include a 30-foot setback whenever possible.

All new and re-development projects that cannot meet the 100-foot setback will be reported to the Water Board staff within 15-days prior to plan approval by City staff.

Attachment B

Christopher Callihan

From: Matt Thompson [Mthompson@waterboards.ca.gov]
Sent: Monday, May 12, 2008 5:57 PM
To: Christopher Callihan
Cc: cniizawa@ci.salinas.ca.us; Lisa McCann
Subject: RE: Revisions to Stormwater Management Plan[Scanned]

Hi Chris,

I received an email from Carl on 5/8 in which he points me to a revised versions of Chapter 4 and 5 posted on the web (thank you Carl). I reviewed those two revised chapters and found that you incorporated the two missing revisions. Thank you. If you would, please send me a final hard copy of the entire SWMP for our record. Also, I suggest you notify the stakeholders of this final revised version and post it on your website, similar to what you did on 4/8.

Thanks...Matt Thompson

Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

V (805) 549-3159
F (805) 788-3572

>>> "Christopher Callihan" <chrisc@ci.salinas.ca.us> 5/1/2008 5:18 PM >>>
Thanks, Matt. I know both of these are in the document. I will find those sections and identify where they were included.

Chris

Christopher A. Callihan, Esq.
Sr. Deputy City Attorney
City of Salinas
200 Lincoln Avenue
Salinas, CA 93901-2639

Telephone: (831) 758-7256
Facsimile: (831) 758-7257
Email: chrisc@ci.salinas.ca.us

PRIVILEGED & CONFIDENTIAL -- ATTORNEY CLIENT PRIVILEGE -- ATTORNEY WORK PRODUCT

The information contained in this electronic transmission is legally privileged and confidential, and it is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, please take notice that any form of dissemination, distribution or photocopying of this electronic transmission is strictly prohibited. If you have received this transmission in error, please immediately contact Christopher A. Callihan at (831) 758-7256 or chrisc@ci.salinas.ca.us and immediately delete the electronic transmission. Thank you.

-----Original Message-----

From: Matt Thompson [mailto:Mthompson@waterboards.ca.gov]
Sent: Thursday, May 01, 2008 5:07 PM
To: Christopher Callihan
Cc: Lisa McCann
Subject: Revisions to Stormwater Management Plan[Scanned]

Good afternoon Chris,

I have reviewed the revised Stormwater Management Program that you submitted on April 7, 2008. I reviewed it to ensure you incorporated all the revisions required in the Water Board's February 2008 resolution. I was able to find in the SWMP all of the required revisions except two, one of which is substantive. Attached is the list of required revisions from the Feb 2008 resolution, with those revisions I could not find denoted in red font. Before I jump to conclusions, I'd like you to have the opportunity to show me in the SWMP where these revisions are. Its a very large document and it's quite possible that I missed them. Please respond within one week and point out to me which sections these revisions are located.

If you did not include these revisions, I trust it was a mistake, and I ask that you submit a revised SWMP within one week that includes these revisions.

Thank you for your attention to this important matter.

Sincerely,
Matt Thompson

Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

V (805) 549-3159
F (805) 788-3572

Attachment C

Christopher Callihan

From: Christopher Callihan
Sent: Tuesday, April 08, 2008 8:37 AM
To: 'Steve Shimek (E-mail)'; 'Robin Lee (E-mail)'; 'Gary Shallcross (E-mail)'; 'Ken Tunstall (E-mail)'; 'Dan Matthies (E-mail)'; 'Sue Shaffer (E-mail)'; 'Traci Roberts (E-mail)'; 'Benjamin Tiscareno (E-mail)'; 'Elizabeth Krafft (E-mail)'
Cc: Carl Niizawa; Dale Rosskamp; Rob Russell; Vanessa Vallarta; Denise Estrada; Christopher Callihan; 'mthompson@waterboards.ca.gov'; 'Lisa McCann (E-mail)'
Subject: City of Salinas Storm Water Management Plan

All:

As directed in the Regional Water Board's February 8, 2008 Resolution approving the City's Storm Water Management Plan (SWMP), City staff have further revised the SWMP to incorporate the 53 required revisions listed in Attachment A to the Regional Board's Resolution R3-2008-0012.

This further revised SWMP and all Appendices are available on the City's homepage at the following address: <http://www.ci.salinas.ca.us/index.html>. The SWMP can also be accessed on the City's Urban Watershed Management page at the following address: <http://www.ci.salinas.ca.us/MtcSvc/StormWater-NPDES/index.html>. We have also posted a link to the Regional Board's Resolution so that you can see the list of required revisions: <http://www.ci.salinas.ca.us/MtcSvc/StormWater-NPDES/pdf/ResolutionNoR3-2008-012.pdf>. All of the revisions made to the SWMP to meet the required revisions are shown in underline/strikethrough form throughout the text of the SWMP.

Attached to this e-mail is a copy of a letter to Regional Board staff transmitting the SWMP with required revisions for their review. As explained in the letter, Regional Board staff will review the required revisions and will report to the Regional Board on July 11, 2008 whether the City has adequately made all the required revisions. Regional Board staff will also provide the public with a 30-day public review and comment period. The Stakeholder Committee is cc'd on the attached letter, but you will not receive a hard copy in the mail as we are sending it to you via this e-mail.

Consistent with BMP 6.18 of the SWMP, the City has opened a 30-day public review and comment period on the required revisions. **The scope of the review and comment period addresses only the required revisions included in the Regional Board's February 8, 2008 Resolution R3-2008-0012. All comments must be submitted in writing and must be received by City staff by 5:00 P.M. on Thursday May 8, 2008.** All comments should be directed to my attention at 200 Lincoln Avenue, Salinas, California 93901.

Please let me know if you have any questions.

Thank you,

Chris Callihan.



L-April 8 SWMP
Transmittal.pdf...

Christopher A. Callihan, Esq.
Sr. Deputy City Attorney
City of Salinas
200 Lincoln Avenue
Salinas, CA 93901-2639

Telephone: (831) 758-7256
Facsimile: (831) 758-7257
Email: chrisc@ci.salinas.ca.us

PRIVILEGED & CONFIDENTIAL -- ATTORNEY CLIENT PRIVILEGE -- ATTORNEY WORK PRODUCT

Christopher Callihan

From: Christopher Callihan
Sent: Wednesday, May 21, 2008 4:22 PM
To: 'Gary Shallcross'; 'Robin Lee (E-mail)'; 'Steve Shimek (E-mail)'; 'Ken Tunstall (E-mail)'; 'Sue Shaffer (E-mail)'; 'Traci Roberts (E-mail)'; 'Benjamin Tiscareno (E-mail)'; 'Elizabeth Krafft (E-mail)'
Cc: Carl Niizawa; Dale Rosskamp; Vanessa Vallarta; Denise Estrada; 'mthompson@waterboards.ca.gov'; 'Lisa McCann (E-mail)'
Subject: City of Salinas's SWMP

All:

Regional Water Board Staff have reviewed the City's April 8, 2008 Storm Water Management Plan. On May 1, 2008, Regional Board staff informed City staff that two of the Regional Board's Required Revisions were not incorporated into the April 8, 2008 SWMP. A copy of Regional Board Staff's pdf notes to City Staff are attached for your reference. City Staff thereafter further revised the SWMP to address these last two outstanding issues. Regional Board Staff have concluded that with these two revisions the City has incorporated all the Required Revisions included as part of the Regional Board's February 22, 2008 Resolution approving the City's SWMP.

The City has posted a complete copy of the City's SWMP, including these two revisions, on the City's website at the following address: <http://www.ci.salinas.ca.us/> The two revisions, one to Element 4 and the other to Element 5 at pages 4-33, 4-34 and 5-18, respectively, are highlighted in yellow for ease of reference.

Also attached for your reference is a transmittal letter sent by City Staff, to which you all are copied. You will not receive a hard copy of this letter unless you request it.

Please let me know if you have any questions.

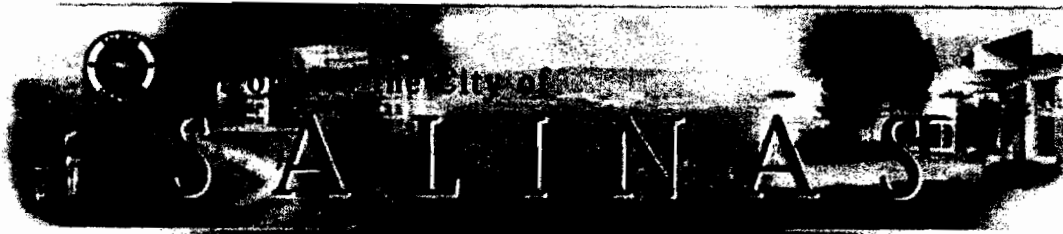
Thank you,

Chris Callihan.



Salinas Stormwater 2008052116161143
Management ... 3.pdf

Attachment D



■ HOME

- City Council
- Boards, Committees & Commissions
- Departments
- Maps
- General Plan
- Municipal Code
- Government Links
- Privacy Statement
- Legal Disclaimer
- Contact Us

Mayor's Welcome Message

Salinas is located on the Central California Coast and is known as the "Salad Bowl of the World." [more...](#)

Community Safety Initiative Status Report

June 24, 2008

Click [here](#) to download the PowerPoint presentation given to City Council at the JUNE 24, 2008 meeting.

Information Bulletin

June 13, 2008

Projects and programs before, between, and after Council action.

Free Summer Lunch/Snack Program Offered at Recreation Centers

June 11, 2008

A free lunch/snack program will be offered for ages 6-18 as part of the Summer Recreation Programs at our sites beginning 6/16/08. Each day a variety of activities will be offered to include: arts & crafts, games, specialty classes and events. For more information call 758-7306.

- Central Park 12:00-4:00 pm
- El Dorado Park 12:00-4:00 pm
- Breadbox Rec Center 1:00-8:00 pm
- Firehouse Rec Center 12:00-6:00 pm
- Hebbron Family Center 1:00-6:00 pm

Hebbron Family Center Teen Lounge Now Open Saturday Evenings!

June 6, 2008

The World Famous Teen Lounge at Hebbron Family Center is now open Saturday evenings from 6:00-9:00 pm through the Summer. This safe, comfortable (and free) lounge allows teenage students to hang out and just kick back with their friends in an environment designed for youth. We offer pool, free use of Internet

Search The Site

Match ALL words ▾

Quick Links

- City Auction
- City Holidays
- Community Profile
- Construction Bids
- Employment
- Library
- Lost/Adoptable Pets
- Neighborhood Problem Solver
- Online Forms
- Recreation & Leisure Activities
- Utility Services
- Who Do I Call About...

access on our lap top computers, the latest Xbox 360 games being projected on a "larger than life" screen and a variety of other in-house activities. Come check out the Teen Lounge on Saturday nights!

Storm Water Management Plan Revision

May 21, 2008

The City of Salinas has made two revisions to the April 8, 2008 version of its Storm Water Management Plan (SWMP). These two revisions were made to conform the SWMP to revisions required by Central Coast Regional Water Quality Control Board staff following their review of the April 8, 2008 submittal. The two revisions are in Element 4 and Element 5 of the SWMP, at pages 4-33, 4-34 and 5-18. Click [here](#) to review the revised SWMP.

New Stormwater Development Standards

May 19, 2008

New draft Stormwater Development Standards are now available for [public review](#). These new standards impact all new development and significant re-development in the City that create or disturb impervious surfaces areas greater than 5,000 square feet. Public comments are due to back to the City by June 20th. Please contact [Carl Nizawa](#), Deputy City Engineer at (831) 758-7432 with comments or questions regarding these new standards.

New Airport Project Open for Public Bid

May 15, 2008

The City of Salinas will be accepting public bids for the 2008 Salinas Municipal Airport Taxiway, Service Road, Tie-down reconfiguration and Beacon Project; AIP-15 (City Project No. 9321-9433). Click [here](#) for more information.

City of Salinas Addresses

Addresses affected by the [Measure V](#) sales tax.

[more...](#)

**** [Click here for archived news stories](#) ****

Website Last Updated: 06/30/2008 15:55:14

Attachment E

Christopher Callihan

From: Christopher Callihan
Sent: Tuesday, May 20, 2008 8:30 AM
To: 'Steve at The Otter Project'; 'Roger Briggs'
Cc: Carl Niizawa; Dale Rosskamp
Subject: RE: Salinas design standards May 19 submittal[Scanned]

Steve:

The City submitted the final revised Storm Water Development Standards to Regional Board staff yesterday, as required. I spoke with Lisa McCann yesterday and she confirmed she had received it. The City did not miss the deadline. The City was timely with this submittal. The City has begun the process of posting the document on the City's website for a thirty-day public review period. The document will be accessible, in full, on the City's website today and the City's thirty-day public review period will begin today. This public review period is consistent with the public participation commitment described in the City's Storm Water Management Plan.

As we indicated at the last Stakeholders meeting, the document is available to all members of the Stakeholders Committee and any other interested person. The document can be accessed by the Stakeholders and all other members of the general public from the City's website. Alternatively, we can provide hard copies or electronic copies of the document. If you would like a hard copy of the document, please let me know and I can make one available for you to pick up.

Thank you for your continued interest in the City's Storm Water Program.

Chris Callihan.

Christopher A. Callihan, Esq.
Sr. Deputy City Attorney
City of Salinas
200 Lincoln Avenue
Salinas, CA 93901-2639

Telephone: (831) 758-7256
Facsimile: (831) 758-7257
Email: chrisc@ci.salinas.ca.us

PRIVILEGED & CONFIDENTIAL – ATTORNEY CLIENT PRIVILEGE – ATTORNEY WORK PRODUCT

The information contained in this electronic transmission is legally privileged and confidential, and it is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, please take notice that any form of dissemination, distribution or photocopying of this electronic transmission is strictly prohibited. If you have received this transmission in error, please immediately contact Christopher A. Callihan at (831) 758-7256 or chrisc@ci.salinas.ca.us and immediately delete the electronic transmission. Thank you.

-----Original Message-----

From: Steve at The Otter Project [<mailto:steve1096@sbcglobal.net>]
Sent: Tuesday, May 20, 2008 8:22 AM
To: Christopher Callihan; 'Roger Briggs'
Subject: Salinas design standards May 19 submittal[Scanned]

7/1/2008

As a member of the Salinas NPDES stakeholder group I had hoped to see a draft of the Development Standards to be submitted on May 19. The committee was told on May 5 that we would not see or have an opportunity to review the design standards. But, we were assured: "You will see it when the Regional Board sees it."

Has Salinas missed the deadline? Not provided a copy to the NPDES stakeholders? Where's the submittal?

Steve Shimek

"Those who say it cannot be done should not interrupt the person doing it."

--Chinese Proverb

Steve Shimek
Executive Director
Monterey Coastkeeper
The Otter Project
3098 Stewart Court
Marina, CA 93933
831/883-4159
exec@otterproject.org
www.otterproject.org

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269.23.21/1456 - Release Date: 5/20/2008 6:45 AM

7/1/2008

Attachment F

Christopher Callihan

From: Carl Niizawa
Sent: Tuesday, May 20, 2008 9:26 AM
To: Christopher Callihan; 'Steve at The Otter Project'; 'Roger Briggs'
Cc: Dale Rosskamp
Subject: RE: Salinas design standards May 19 submittal[Scanned]

The draft Stormwater Development Standards document and appendices are available for review and comment on the City's website <http://www.ci.salinas.ca.us/>

Thank you
Carl Niizawa

-----Original Message-----

From: Christopher Callihan
Sent: Tuesday, May 20, 2008 8:30 AM
To: 'Steve at The Otter Project'; 'Roger Briggs'
Cc: Carl Niizawa; Dale Rosskamp
Subject: RE: Salinas design standards May 19 submittal[Scanned]

Steve:

The City submitted the final revised Storm Water Development Standards to Regional Board staff yesterday, as required. I spoke with Lisa McCann yesterday and she confirmed she had received it. The City did not miss the deadline. The City was timely with this submittal. The City has begun the process of posting the document on the City's website for a thirty-day public review period. The document will be accessible, in full, on the City's website today and the City's thirty-day public review period will begin today. This public review period is consistent with the public participation commitment described in the City's Storm Water Management Plan.

As we indicated at the last Stakeholders meeting, the document is available to all members of the Stakeholders Committee and any other interested person. The document can be accessed by the Stakeholders and all other members of the general public from the City's website. Alternatively, we can provide hard copies or electronic copies of the document. If you would like a hard copy of the document, please let me know and I can make one available for you to pick up.

Thank you for your continued interest in the City's Storm Water Program.


Chris Callihan.

Christopher A. Callihan, Esq.
Sr. Deputy City Attorney
City of Salinas
200 Lincoln Avenue
Salinas, CA 93901-2639

Telephone: (831) 758-7256
Facsimile: (831) 758-7257
Email: chrisc@ci.salinas.ca.us

PRIVILEGED & CONFIDENTIAL -- ATTORNEY CLIENT PRIVILEGE -- ATTORNEY WORK PRODUCT

6/24/2008



The information contained in this electronic transmission is legally privileged and confidential, and it is intended solely for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, please take notice that any form of dissemination, distribution or photocopying of this electronic transmission is strictly prohibited. If you have received this transmission in error, please immediately contact Christopher A. Callihan at (831) 758-7256 or chrisc@ci.salinas.ca.us and immediately delete the electronic transmission. Thank you.

-----Original Message-----

From: Steve at The Otter Project [<mailto:steve1096@sbcglobal.net>]
Sent: Tuesday, May 20, 2008 8:22 AM
To: Christopher Callihan; 'Roger Briggs'
Subject: Salinas design standards May 19 submittal[Scanned]

As a member of the Salinas NPDES stakeholder group I had hoped to see a draft of the Development Standards to be submitted on May 19. The committee was told on May 5 that we would not see or have an opportunity to review the design standards. But, we were assured: "You will see it when the Regional Board sees it."

Has Salinas missed the deadline? Not provided a copy to the NPDES stakeholders? Where's the submittal?

Steve Shimek

"Those who say it cannot be done should not interrupt the person doing it."
--Chinese Proverb

Steve Shimek
Executive Director
Monterey Coastkeeper
The Otter Project
3098 Stewart Court
Marina, CA 93933
831/883-4159
exec@otterproject.org
www.otterproject.org

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269.23.21/1456 - Release Date: 5/20/2008 6:45 AM

6/24/2008

Attachment G

Christopher Callihan

From: Dale Rosskamp
Sent: Tuesday, May 20, 2008 12:01 PM
To: 'Gary Shallcross'; 'Robin Lee (E-mail)'; 'Steve Shimek (E-mail)'; 'tunstallinc@aol.com'; 'Dan Matthies (E-mail)'; 'Sue Shaffer (E-mail)'; 'Traci Roberts (E-mail)'; 'Benjamin Tiscareno (E-mail)'; 'Elizabeth Krafft (E-mail)'; 'mog@ausonio.com'; 'bpelich@leeandpierce.com'; 'mikewadsworth@redshift.com'; 'christie@svbe.com'; 'tiffanyd@salinaschamber.com'; 'razorharrod1@comcast.com'; 'lino@bagaia.com'; 'fpierce@leeandpierce.com'; 'tomcarvey@comcast.net'; 'ckevans100@sbcglobal.net'
Cc: Christopher Callihan; Carl Niizawa; Denise Estrada; Michael Ricker; Vanessa Vallarta
Subject: Posting of New Storm Water Development Standards on City of Salinas web site

All:

New Stormwater Development Standards are now available for public review at the attached internet link below. These new standards impact all new development and significant re-development in the City that create or disturb impervious surfaces areas greater than 5,000 square feet. Public comments are due to back to the City by June 20th. Please contact Carl Niizawa <<mailto:carln@ci.salinas.ca.us>>, Deputy City Engineer at (831) 758-7432 with comments or questions regarding these new standards.

Sincerely,

Dale Rosskamp, Senior Civil Engineer

City of Salinas

<http://www.ci.salinas.ca.us/DevPermitSvcs/Engineering.html>