

Dominic Roques  
Storm Water Program Manager  
California Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, California 93401

Re: Comments on City of Salinas Municipal Separate Storm Sewer System  
NPDES Permit CA0049981

Dear Mr. Roques:

Thank you for the opportunity to comment on the draft Municipal Separate Storm Sewer System (MS4) NPDES Permit for the City of Salinas (CA0049981). We have reviewed the proposed language in Section I of the draft permit and are supportive of the Water Board's approach to establish a Watershed Asset Management Program.

40 CFR § 122.41(e) requires permittees to properly operate and maintain all facilities and systems of treatment and control which are used by the permittee to achieve compliance with the permit and 40 CFR § 122.26(d)(2) requires storm water dischargers to provide adequate fiscal analysis, program management, and characterization data. EPA has required asset management plans (AMPs) in EPA-issued wastewater and stormwater permits in order to ensure consistency with federal regulation. We encourage states to require utility-specific AMP development requirements in NPDES permits as a method for establishing consistent performance of water infrastructure systems, meeting water quality targets in a cost-effective manner, and ensuring consistency with federal regulations.

EPA has authored multiple papers to promote asset management for NPDES-regulated wastewater and stormwater systems, including a 2014 Guide entitled "Asset Management, Incorporating Asset Management Planning Provisions into NPDES Permits" and a 2017 publication entitled "Asset Management Program for Stormwater and Wastewater Systems: Overcoming Barriers to Development and Implementation". These documents can be found on EPA's asset management website here: <https://www.epa.gov/sustainable-water-infrastructure/asset-management-water-and-wastewater-utilities>.

We appreciate the opportunity to review and comment on the draft permit and fact sheet. If you have any questions regarding this matter, please contact Jamie Marincola of the NPDES Permits Section at (415) 972-3520.

Sincerely,

//s// 8/27/19

Elizabeth Sablad, Manager  
NPDES Permits Section (WTR-2-3)