

# MONTEREY REGIONAL STORM WATER PERMIT PARTICIPANTS GROUP

---

March 29, 2005

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

Subject: Monterey Regional Storm Water Management Program

Dear Chairman Young and Regional Board Members:

This letter is a response to the multiple comment letters received by Regional Board staff over the past 2 years on the Monterey Regional SWMP. The Monterey Regional Stormwater Permit Participants Group management committee is currently a collaboration of 8 agencies who have worked together for 5 years to develop a comprehensive, BMP-based, watershed protection program the Monterey Regional Storm Water Management Program (MRSWMP). Over the past 5 years our Group has evolved and grown to include not only the 8 permit seekers that are represented as official members of the management committee, but many additional organizations who have worked with us to create a more effective program.

Current Management Committee members include the traditional MS4's in the Southern Monterey Bay Region who seek permit coverage under the State's Storm Water General Permit for Small MS4's, namely: Cities of Carmel by-the Sea, Pacific Grove, Monterey, Sand City, Seaside, Del Rey Oaks, Marina, and the County of Monterey. In addition to this Group, we have additional collaborative agreements with Pebble Beach Company, Carmel Unified School District, Pacific Grove Unified School District, and Monterey Peninsula Unified School District. We continue to work closely with the Monterey Bay National Marine Sanctuary to develop, implement, and promote water quality programs in the region, and we have extended invitations for numerous other non-traditional MS4's to join us. This Group represents much of the geographical area bordering the coast and extending inland from Carmel Bay to the Salinas River and additional pockets of urbanized areas to the North within Monterey County, a total population of approximately 125,000.

In March of 2000, the "Stormwater Subcommittee" to the Monterey Regional Water Pollution Control Agency's Technical Advisory Committee, began meeting at the request of member agencies to investigate the advantages of

**Chairperson**  
Jennifer Gonzalez, P.E.

**Vice-Chairperson**  
Elizabeth Krafft.

---

**Member Entities**

*City of Pacific Grove*

*City of Monterey*

*City of Sand City*

*City of Seaside*

*City of Del Rey Oaks*

*City of Marina*

*City of Carmel*

*County of Monterey*

---

**Other Participating Entities**

*Pebble Beach Company*

*Monterey Peninsula Unified School District*

*Carmel Unified School District*

*Pacific Grove Unified School District*

---

**Program Manager**

*Monterey Regional Water Pollution Control Agency*

*5 Harris Court*

applying for Phase II General Permit coverage as a group. During that process we identified several additional agencies that are outside the wastewater agency's jurisdiction, and invited them to join the Group. MRWPCA, the regional sewer agency, became the administrative agent in organizing the Group, because of their staff expertise in pulling together often diverse interests through their authority as a JPA and because the Phase II regulations affect many of their member entities. MRWPCA is not an owner or operator of an MS4 as has been stated by one commenter, they are merely acting as an administrative agent for the Group. In the first year, the Group explored issues such as liability, fiscal issues, permit elements, coordination with other state and federal entities, and boundaries.

In July 2000, the Group invited State and Regional Board staff to participate. Regional Board staff began attending Group meetings and acting as an advisor, encouraging us to apply for permit coverage as a group. In April 2001, the Group member agencies began meeting monthly to draft a Memorandum of Agreement and continued to explore issues related to joining together.

In April 2002, the Regional Group began the Best Management Practices (BMP) and Measurable Goals (MG) selection process using the EPA Phase II Toolbox and the "National Menu of BMPs." Subcommittees met to determine appropriate BMPs for each of the six minimum measures and to eliminate those that were not applicable to the region or otherwise overlapped with other existing programs. The list was further examined by the entire group to target the BMPs to our pollutants of concern and to assess the best use of resources.

On March 10, 2003, the Group turned in the first draft Monterey Regional Storm Water Management Program and nine Notices of Intent to Comply with the State's Small MS4 General Permit to the Central Coast Regional Water Quality Control Board. On July 2, 2003 we received a letter from Regional Board staff with requests for modifications to the program. Subcommittees were again convened and revisions were submitted to Board staff.

In February 2004, the plan was accepted as complete by Regional Board staff and posted on the State Board website for a 75 day public review period. The Regional Board received several comment letters from environmental organizations, as well as State and Federal agencies, with additional concerns. On June 8, 2004 a Stakeholders Meeting was held in Monterey with Group members, Regional Board staff, and commentors. As a result of discussions at that meeting the Group agreed to make additional revisions to the Storm Water Management Program.

A subcommittee of the Regional Storm Water Group met over a 4½ month period working diligently to substantially redraft the program in response to comments. The program was resubmitted to Regional Board staff in December 2004 and was again accepted as complete by RWQCB staff and posted to the State Board website for a 30 day comment period.

In January of this year additional comment letters were received by Board staff. To date, the Regional Group has responded to comments by making changes to our Program without preparing an official written response to comments. Many of the comments made throughout the process have been on issues regarding General Permit requirements, not to the specifics of our plan. Those issues were responded to in great detail by Regional Board staff in the "Supplemental Sheet for Regular Meeting of February 11, 2005" prepared on February 1, 2005. The Group incorporates those responses into this letter by reference and wishes to expound on several statements made within that document.

Our Group has worked very hard to consider and address the intent of comments, revising our program multiple times and going far beyond the minimum requirements of the General Permit. Many of the comments made are in opposition to the requirements of the General Permit while others say that the Group in general has produced a document that is vague and ineffective. Unfortunately, some of the comments say that our document is vague and that we are missing numerous BMPs that should be included, but do not give specific instances of additional programs that they would like to see. The one letter that we did receive with very specific requests, from the Monterey Bay National Marine Sanctuary in June 2004, did result in specific changes to the program and a subsequent letter of support for the program. The personal commitment of member entity staff to the protection and enhancement of water quality and to this program is evidence of the water quality ethic that each of our agencies supports.

Though this document is not meant to be an exhaustive response to comments, the Group would like to respond to what we believe have been some inaccurate statements of fact and opinion regarding the program.

Maximum Extent Practicable (MEP) Standard :

The issue of what constitutes MEP has been the continued subject of multiple comments throughout this process. MEP is defined in the General Permit in part as "...an ever-evolving, flexible, and advancing concept, which considers technical and economic feasibility" (General Permit, p.4, 17). That definition would indicate that, though we have chosen to join together as a group of entities to implement our programs, MEP is not necessarily the same for each entity. The smallest City in the group with population 260 does not have the same resources, either technical or economic, nor does it have the same volumes of storm water runoff, as the largest entity with population 32,000. Hence, MEP for these two vastly different sized entities would logically be different.

Reference by commentators to other small municipalities who have successfully implemented Phase I permits fails to recognize that those Phase I permits that have folded in smaller entities typically cover a much larger total population base than the 125,000 in our permit area and have been voluntarily implemented. Our program is not a Phase I program and we do not believe it appropriate to ratchet our program to that level before our first permit term has even begun.

Not a Program:

Another contention which we would refute: "At this stage the "program" is not a program at all, but mostly a set of vague statements of intention to comply at some point with the Order's provisions." (Horner, p.1 4/16/04) The Phase II program allows a 5 year time frame for "development, implementation and enforcement" specifically in four of the six minimum control measures. As stated in the General Permit under *Storm Water Management Program Requirements*, "The SWMP shall serve as a framework for identification, assignment and implementation of control measures/BMP's ..." (General Permit, p. 8, D)

In response to these comments, two minimum control measure implementation plans were developed and added to the December 8, 2004 draft focused on *Public Education and Outreach* and *Public Involvement and Participation*. The Public Education and Outreach implementation program laid out in detail in Appendix E of the SWMP is nearing completion of full implementation of the year 1 program. The Group chose to budget for and implement the Public Education Program beginning in July 2004 to show "good faith" in our continued commitment to a strong and effective program. The program has been very successful with bus advertisements, radio ads, and extensive outreach to school classrooms, stenciling groups, and the general public among other activities.

Characterization of the Monterey Area:

One commenter in reference to the area's growth rate and setting stated: "The area already has a population exceeding 400,000, is growing comparatively rapidly ..." (20.7% growth from 2000-2010 for Monterey County as a whole.)" (Horner, 4/16/04, p.1)

The permit area population represented by the MRSWMP is 125,642. Though Monterey County as a whole may have a population slightly over 400,000, this includes several areas covered under separate Phase II permit applications and the one Phase I municipality in the Central Coast region. Southern Monterey County cities, the closest of which is 20 miles from the permit area, represent a population of 54,000. The City of Salinas, a Phase I City, represents a population of approximately 143,800. The largest percentage growth rates in the County are occurring in South County cities and in the Soledad prisons. "Growth" rates in many of the Peninsula cities were actually negative between 1990 and 2000 and remain so. The lack of drinking water resources have virtually eliminated the potential for major growth referred to in that comment.

New Development and Redevelopment Program:

Several comments relating to required adoption and implementation of Attachment 4 and general New Development and Redevelopment Program elements state that evaluation of the intended ordinance modifications and adoption of BMP's is not possible because the objectives of this section of our program are not described. (Coastal Commission, 4/16/04, p. 4)

The MRSWMP describes the BMP intent for the Post-Construction Runoff Control minimum control measure as "Reduce post-construction pollution by developing post

construction guidelines and standards for storm water runoff from new development and redevelopment. These will address such pollutants as sediments, chemicals, oils and grease, metals, and nutrients, as well as erosion and flooding." (MRSWMP, p.26)

The specific details of the water quality protection ordinance have not yet been developed, but they will largely be taken from model ordinances contained in the Model Urban Runoff Program (MURP), CASQA Handbooks, and other sources, some of which are the same ones referred to by commentators. It is the intent of the Group to develop these standards together and to adopt similar standards throughout the region. The Group as a whole does not meet the requirements set forth in the General Permit for implementation of Attachment 4, but we do intend to develop our own New Development and Redevelopment Program for projects greater than or equal to an acre as required by the General Permit.

#### Specific Changes Requested

Several changes were made in response to specific comments:

- "...we urge that the Purpose of the Program (as stated on Page 1-1) be revised to focus on protection of water quality rather than adoption of management practices." (Ocean Conservancy et al, 4/27/04) As a result of this concern, our purpose statement was revised to strengthen the importance of water quality protection while recognizing that this document is also intended to fulfill the requirements of our permit.
- "The MRSWMP should address stormwater pollution problems from a watershed approach." (Ocean Conservancy et al, 4/27/04) The MRSWMP was extensively revised as a result of this comment. The original document included nine separate BMP tables for each Group entity with separate timelines and in some cases different BMPs chosen for different entities. The revision took these 9 tables and merged them into one set of BMP's that all of the entities will implement on the same timeline in a more collaborative fashion where possible. In doing so, though the program is more cohesive, but the specific details of each entity's implementation... are not provided because, as each City is different, so are its specific details of implementation.
- Following the initial round of comment letters, and the stakeholder meeting, the MRSWMP Group received a letter which included a detailed list of suggested revisions requested by the MBNMS. The Group was able to meet with Sanctuary staff and incorporated the majority of the requested charges. On December 29, 2004, the Marine Sanctuary submitted a letter in support of the revised program and acknowledged the significant efforts that went into redrafting the program.

The second round of comment letters elicited additional comments about the lack of additional BMP's. As stated previously, the Group took great care in choosing BMP's that address the pollutants of concern for our areas. Timelines were set taking into account the large number of BMP's (102) and the resources currently and anticipated to

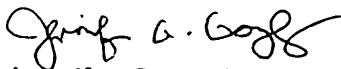
be available. Lack of funding options is a major issue that each entity within the group is working to address and is a reality that drives some of the timelines within the document. The entities must stagger new efforts over several years in order to have an effective, well planned program.

Examples of creative funding efforts that are already underway include collaborative grant applications that are currently in development for this year's round of Proposition 50 grant funds as well as implementation of past grant funded programs. The City of Monterey received grant funding in 1996 to develop the *Model Urban Runoff Program* in cooperation with Local, State, and Federal agencies. Many elements of that program have already been implemented in both the City of Monterey and other local cities. The City of Pacific Grove has received funding from two separate grant cycles and has begun implementing a significant Urban Runoff Dry Weather Diversion project within their City in areas that have been the subject of scrutiny due to past sanitary sewer overflows. The City of Monterey is currently working with and providing matching funding with the Monterey Bay National Marine Sanctuary's Citizen Watershed Monitoring Network performing source tracking as the result of copper found in dry and wet weather volunteer monitoring samples through a grant from the Sanctuary Integrated Monitoring Network. These are just a few of the activities already underway in the region that show a level of sophistication already inherent in the program.

As the result of recent teleconferences between permittees, Regional Board staff and commentors additional revisions are now underway to attempt to add more detail to the program in an effort to address additional comments and concerns as thoroughly as possible. The Group hopes to come to a closer understanding and agreement with the commentors that what we propose does in fact meet and exceed the requirements of the General Permit. Unfortunately, many of the most recent comments did not include specific details to be addressed, so we continue to guess at the specific details that are purported to be missing.

We appreciate this opportunity to comment further on the response to comments prepared by Regional Board staff for the 2/11/05 Board meeting and wish to incorporate those responses by reference. We would also like to incorporate by reference the "Summary of Changes made between the February 17, 2004 and the October 27, 2004 versions of the MRSWMP" and Section III "Discussion" of the staff report prepared for item No. 27 of the February 11, 2005 Central Coast Regional Water Quality Control Board meeting. Each of these items reiterates our commitment to going "above and beyond" the requirements of the NPDES Phase II General Permit and our proven record in doing so.

Sincerely,



Jennifer Gonzalez, P.E.  
Chair

**CALIFORNIA COASTAL COMMISSION**

CENTRAL COAST DISTRICT OFFICE  
725 FRONT STREET, SUITE 300  
SANTA CRUZ, CA 95060  
PHONE: (831) 427-4863  
FAX: (831) 427-4877



March 30, 2005

TO: Donette Dunaway  
Regional Water Quality Control Board, Region 3  
895 Aerovista, Place., Suite 101  
San Luis Obispo, CA 93401-7906

FROM: Ross Clark  
Central Coast Water Quality Coordinator  
The California Coastal Commission

SUBJECT: **Monterey Regional Storm Water Management Plan**

---

This letter is intended to provide support for the Monterey Regional Storm Water Management Plan while stressing the need for several modifications.

Background: Many of the municipalities covered under this regional permit have been active partners with the Monterey Bay National Marine Sanctuary Water Quality Protection Program (WQPP) since its inception. For instance, the City of Monterey was a partner with the Sanctuary, the Coastal Commission and others in creating the Model Urban Runoff Program, intended to provide guidance to municipalities regarding Phase II program requirements and to encourage regional partnerships. Many of the products and partnerships that are encompassed within this Storm Water Management Plan come from these previous efforts.

These accomplishments should be acknowledged, supported and encouraged to continue.

**Comment 1.** The WQPP should play a principal role in coordinating the annual review of this and other Phase II programs and provide a forum to critique, evaluate and improve plan actions and activities.

The Monterey Bay Sanctuary Water Quality Protection Program has been a significant resource in the development of these programs, in providing a forum for critical review of progress and in defining future improvements to program actions. This collaboration was exemplified in the 2004 review of the Monterey Regional draft plan, where initial efforts were plagued with frustration, misunderstanding and lack of specificity. However, Many of these roadblocks were resolved during a meeting between regional plan municipalities and Water Quality Protection Program members (including the Coastal Commission, the MBNMS, and several NGOs). I attribute this to the strong working relationships and trust fostered through the Water Quality Protection Program. This relationship should be supported by the Phase II program and by the Regional Board.

**Comment 2.** As was stressed in the Coastal Commission letter to the Regional Board dated April 15, 2004, we believe that the adoption of comprehensive stormwater ordinances by these municipalities should be part of this stormwater program and is the best mechanism to minimize the degradation of water quality from future land use changes. Therefore we urge the Regional Board to consider broader application of the Attachment 4 stormwater ordinance requirements than is required by the State Board criteria for "Supplemental Provisions for Larger and Fast Growing Regulated Small MS4s".

New development often results in an increase in impervious surface, which in turn decreases the infiltrative function and capacity of existing permeable land on project sites. The reduction in permeable surface therefore leads to an increase in the volume and velocity of stormwater runoff that can be expected to leave the site. Additionally, runoff from impervious surfaces can contribute significantly to local pollutant loads.

These impacts reduce the biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes, reduce optimum populations of marine organisms and may have adverse impacts on human health. These impacts are of special concern in drainages such as the Gabilan Watershed (including the Reclamation Ditch and Tembladero Slough) where water quality is already severely degraded by urban and other land uses and where significant future urban growth is projected. These impacts can be greatly reduced through proper land use planning and development guidelines.

The State Board thresholds determining where Attachment 4 should be used were developed for the state as a whole and did not take into account regional issues such as; future growth pressure from Silicon Valley, sensitive marine resources within the Monterey Bay National Marine Sanctuary, or the four State Water Quality Protection Areas within the boundaries of this project. Further the State Guidelines did not take into account regional water quality problems associated with urban and rural residential development, such as those of the North Salinas Valley, including the Tembladero Slough, Reclamation Ditch and the Moss Landing Harbor (each currently listed on the Clean Water Act 303(d) list of impaired waters). Finally, the State Guidelines did not take into account the significant financial resources being directed to improving water quality from agriculture and urban land uses in the Monterey area, as well as the current actions to restore significant coastal wetland habitat within this region. All these actions would be undermined by future development that does not include measures such as those outlined in Attachment 4.

Commission staff believes development standards and other provisions of a water quality protection ordinance are necessary to ensure that new development and redevelopment does not contribute to coastal water quality degradation. The implementation of such an ordinance will ensure that all development is evaluated for potential adverse impacts to water quality and that applicants consider Site Design, Source Control and Treatment Control BMPs in order to prevent polluted runoff and water quality impacts resulting from the development. The Commission staff has reviewed the provisions outlined in the Monterey Regional Phase II permit and concluded that these provisions do not provide sufficient detail to the public nor planning staff responsible



for the development of a water quality protection ordinance that would be sufficient to properly protect water quality or be adopted as part of a future Local Coastal Plan amendment. We believe that water quality protection practices should be included in all future development and that all ordinance updates should at a minimum include guidance to incorporate site design and source control Best Management Practices in all future development. Further, we suggest that Attachment 4 not be limited to the permit boundaries but be adopted throughout the municipalities. While many municipalities are presently not subject to mandatory adherence to Attachment 4, Commission staff believes that prudent adoption of these guidelines today by all municipalities regardless of size will lead to greater water quality protection as well as less expensive water quality upgrades and mitigation activities by the municipalities in the future. Therefore, comprehensive adoption of Attachment 4 now, will provide the planning staff and the public with a standard set of water quality protection guidelines for the entire county, leading to less confusion and greater regional protection of water resources.

Finally, within the Coastal Zone, the Coastal Commission staff will continue to include design guidelines similar to those in Attachment 4 in future Local Coastal Plan amendments (see Carmel Local Coastal Plan 2004). For these reasons, we strongly advise the adoption of water quality policies throughout the region represented by the Monterey Regional Storm Water Management Plan, rather than only within the Coastal Zone or as defined by the permit boundary of the Monterey Regional Storm Water Management Plan. Protecting water quality is a watershed effort and dissection of watersheds into political jurisdictions is less effective than working toward comprehensive management of coastal resources.

- Original Message -----

From: "NRDC's California Activist Network" <nlrcalifornia@nrdcactn.org>

Sent: Tuesday, March 22, 2005 11:59 AM

Subject: Special Alert: Speak out to keep polluted runoff out of California's fragile marine ecosystems

> =====

> Natural Resources Defense Council's

>

> CALIFORNIA ACTIVIST NETWORK SPECIAL ALERT

>

> NRDC's California Activist Network was formed to mobilize and provide action

> tools to Californians and others concerned with protecting the state's

> extraordinary wealth of natural treasures and the health of its citizens.

>

> March 22, 2005

> =====

>

> Special alert for California Activist Network Members:

> Speak out to keep polluted runoff out of California's fragile marine ecosystems

> Take action now at

> <http://www.nrdcactn.org/actn/index.html?top=2&siteid=52517>

>

> =====

>

> Big Sur and the Monterey Peninsula form one the most beautiful coastlines on

> earth. The rugged Santa Lucia Mountains fall to the sea, where rich kelp

> forests and ocean canyons teem with rare corals, sea otters, seals, dolphins,

> yellowfin tuna and numerous species of whales and sharks.

>

> This magnificent marine ecosystem includes five areas so biologically diverse,

> and yet so fragile, that they are afforded special legal protection.

California

> prohibits the discharge of \*any\* pollution into these delicate coastal waters,

> known as "areas of special biological significance." But in reality, polluted

> runoff flows into them freely. The toxins, herbicides, pesticides, fecal

> bacteria and other contaminants in that runoff can kill marine life, threaten

> public health, degrade coastal habitats, cause beach closures and damage the

> local economy.

>

> But instead of protecting these unique marine resources, the Central Coast

> Regional Water Quality Control Board has proposed rubber-stamping a weak clean-

> up plan that would do little to reduce water pollution along the coast, and

> that would allow contaminants to continue to flow into the five areas of

> special biological significance. The plan ignores cost-effective clean-up

> practices commonplace elsewhere in California, and would postpone for years

> measures that could be implemented today. In short, the plan fails to protect

> the extraordinary coastal resources of Big Sur and the Monterey Peninsula.

>

> The water quality board is poised to adopt the proposed plan at its next

> hearing, but is accepting comments on the plan until 5pm Wednesday March 30th.

>

- >
- > To change your subscriptions or update your email address or other information,
- > go to: <http://www.nrdaction.org/preferences.htm>
- > To unsubscribe from the California Activist Network Action Alert, send an email
- > message to [wildcalifornia@nrdaction.org](mailto:wildcalifornia@nrdaction.org) with REMOVE in the subject line.
- >
- > =====
- > About NRDC
- > =====
- >
- > The Natural Resources Defense Council is a nonprofit environmental organization
- > with more than one million members and online activists, and a staff of
- > scientists, attorneys and environmental experts. Our mission is to protect the
- > planet's wildlife and wild places and ensure a safe and healthy environment for
- > all living things.
- >
- > For more information about NRDC or how to become a member of NRDC, please
- > contact us at:
- >
- > Natural Resources Defense Council
- > 40 West 20th Street
- > New York, NY 10011
- > 212-727-4511 (voice) / 212-727-1773 (fax)
- > California Activist Network email: [wildcalifornia@nrdc.org](mailto:wildcalifornia@nrdc.org)
- > <http://www.nrdc.org>
- >
- > Also visit:
- > BioGems -- Saving Endangered Wild Places
- > A project of the Natural Resources Defense Council
- > <http://www.savebiogems.org>
- >

>>> delay of development meeting 3/29/2005 7:23:10 PM >>>

**SAVE OUR SHORES ACTION ALERT!**  
March/April 2005

**1. UPHOLDING CLEAN WATER LAWS ON THE ON THE MONTEREY PENINSULA-  
RESIDENT VOICES NEED TO BE HEARD**

**WHAT'S THE ISSUE?**

The largest source of water pollution in our coastal oceans comes from land-based activities. Toxins and pollutants carried to the sea in urban runoff, or storm water, often pose risks to human health and cause harm to marine organisms and ecosystems. To protect water quality, Congress passed legislation - first in 1972 with the Clean Water Act and then again in 1987 - requiring a permitted regulatory program for municipalities to manage their runoff.

As required by state and Federal laws, the cities of the Monterey Peninsula and Pebble Beach Company (special district) are submitting their applications to the Regional Water Quality Control Board for a general discharge permit. The cities chose to coordinate and develop an integrated, regional approach to manage storm water.

While Save Our Shores supports the regional effort, we were disappointed that the product of their efforts, the DRAFT Regional Storm Water Management Program (RSWMP), barely meets minimum protection standards. What could have been an opportunity for the Peninsula cities to bring innovation to the field of storm water management, building upon the successes of their own past efforts and those of other communities, failed to hit the mark. The Draft RSWMP is weak and incomplete, and will not protect marine resources from pollutants, such as grease, oil, pesticides, and toxic chemicals that drain to our beaches and ocean annually.

The Draft RSWMP must be approved by the Regional Water Quality Control Board in order for the cities to receive their discharge permits. Save Our Shores opposes approval of this Plan, in its current form, and we have asked the Regional Board to send it back to the cities to be re-written with real measures to protect our shoreline and ocean resources. A copy of the Draft RSWMP can be downloaded at:  
<http://www.waterboards.ca.gov/centralcoast/Permits/Index.htm>

**WHAT TO DO!**

Attend the Regional Water Quality Control Board Hearing on the Monterey Regional Storm Water Management Program Permit Application

The only way we can ensure that the Regional Board will take this matter seriously is if residents of the central coast make your voices heard. Please plan to attend this important meeting and demonstrate, by your presence, how important this issue is to the Monterey Peninsula community.

**WHEN:** May 12-13, 2005

**WHERE:** Watsonville City Council Chambers, 250 Main Street, Watsonville

For more information about the meeting and directions to the Watsonville City Council chambers, please visit the Central Coast Regional Water Quality Control Board website at:  
<http://www.waterboards.ca.gov/centralcoast/Board/Meetings/2005meetings.htm>

Or, write to the Regional Board and demand a more rigorous storm water management plan that requires best management practices, promotes an innovative and robust public education program, and demonstrates that

the program will meet the federally mandated maximum standards to assure compliance with water quality standards. Your comments can be sent to:

Ms. Donnette Dunaway  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Comments are due by 5:00 p.m. on March 30, 2005, and can be faxed to:  
805-549-3147 or sent via email to [ddunaway@waterboards.ca.gov](mailto:ddunaway@waterboards.ca.gov)