



City of Salinas

Development & Engineering Department * 200 Lincoln Avenue * Salinas, California 93901

August 12, 2008

Matt Thompson
Senior Water Resource Control Engineer
California Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Re: Comments on the City of Salinas Stormwater Development Standards

Dear Mr. Thompson:

This letter is per your request of July 17th to provide details with relating to revisions in the Stormwater Development Standards. While there are many changes to the document from the May 2008 version, the listing below only corresponds to those related to those requested changes.

LID Center Comments (Summarized action for “important to address”)

1. More details for needs at the Pre-Application Meeting

Additional information regarding what is expected of the applicant at the pre-application project conceptualization meeting has been added to page 1-20.

2. Computer Modeling of Stormwater

In Section 1.5.3 Numeric Criteria for Stormwater Management, item 4, computer modeling of pre and post construction runoff is now required for all new development projects one acre or greater.

3. Infiltration and Drawdown time

Design standards for infiltration of stormwater infiltration BMPs is given in 4.3.3, starting on page 4-12. The standards presented in Section 4.3.3 are based on a survey of approximately 8 western agencies and the Center for Watershed Protection (CWP).

Drawdown time is generally limited to 72 hrs per section 1.5.6 Restrictions page 1-11. Note that the standards promote infiltration by allowing for greater than 72-hour retention, provided that the applicant provide proper means for vector and sanitary controls.

4. Cisterns/Rainwater capture

On page 3-36 to 3-42 rainwater capture and reuse has been added to the standards.

5. Waiver Criteria

The Waiver Criteria listed on 1.4.6, page 1-7 is intended to be a placeholder for a future Waiver program. The Waiver program is to be review with RWQCB staff for approval following the issuance of the Stormwater Development Standards.

6. Address how and why site planning is a part of LID

“Section 2.1 What is LID” has been expanded and moved to the front of the document, into the executive summary. “How to use the Salinas SWDS” has been added also to this section.

General Performance Criteria and Predevelopment Hydrology

As requested, numeric criteria are now listed in section 1.5.3 “Numeric Criteria for Stormwater Management” pg 1-9.

1. Listed numeric criteria for effective impervious surfaces exceeds the recommended requirements.
2. Stated criteria insures that each drainage area in the site plan design is associated with numerical defined BMPs sizing.
3. Peak site discharge is numerical limited and computer programmed calculations of the hydrology is required from both pre and post development to show this is accomplished.
4. Listed numeric criteria are consistent with the City’s NPDES permit.

Requirements applied in Salinas should be reflected of local hydrologic and geomorphologic considerations, and not applied solutions from other areas. The City of Salinas sits in a relatively flat plain at the base of the large Gabilan Watershed. Subject to natural flooding, extensive hydrographic modeling in has shown that implementation of extensive detention in the Salinas area will increase of the area flooding potential because local flow delays will aggravate peak watershed flows. This subject is detailed in Section 5 of the stormwater development standards. As hydromodification criteria typically result in the implementation of detention basins and/or devices that release increased storm runoff volumes at low rates over long durations that delays discharge volumes into the regional detention areas (Carr Lake, Santa Rita, etc.), hydromodification controls can actually have negative flood control impacts.

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The City of Salinas is currently in discussions with the County of Monterey for removal of all detention requirements, except that needed to protect infrastructure during large storm events.

Furthermore, the premise for hydromodification peak control is stream and creek erosion. Local creeks are the subject of sedimentation deposition from upstream, undeveloped sources rather than erosion potential for which the hydromodification procedures are intended to mitigate. The City spends significant funds to remove this sediment loading from its creeks for the purposes of flood control. And as the vast majority of the City drains into hard piping, the application of the costly modeling exercise associated with hydromodification procedures for peak control on all development brings little environmental benefit at significant cost.

Given the low permeability soils in the City, additional numeric measures to facilitate retention are emphasized in the standards. As noted above, in section 1.5.6, the standards promote infiltration by allowing for greater than 72-hour retention, provided that the applicant provide proper means for vector and sanitary controls. Additionally, the City uses larger Rational Method C values for impervious and semi-pervious surfaces (noted by the LID Center) in Table 4-4, pg 4-23 to enlarge the size of the BMPs for volumetric considerations. This provides greater volume for retention and is similar to a method used by Contra Costa County for volumetric control.

With your help, the City of Salinas looks forward to implementation of the Stormwater Development Standards for effective and pragmatic stormwater quality control and implementing improvement in the local Gabilan Watershed.

Sincerely,



Carl Niizawa P.E., DEE
Deputy City Engineer
City of Salinas

cc: Lisa McCann