



Comment Letter–Caltrans MS4 Permit due 9.19.2011 NOON

The SWMP Storm Water Management Plan should be approved by a Governing Body. There should also be proof that the SWMP is adopted into a Master Plan i.e. Transportation Plan, General Plan or Governing Policy Document.

LID Low Impact Development has a couple of additionally aspects not mentioned:

- Compliance with CEQA including Soils and Geology, Hazardous Materials, and Water and Hydrology.
- Public Health Standards need to be addressed and the governing Public Health Body. Annual Reporting should be accompanied by approvals by a Governing Body.

You state:

*b. The SWMP shall contain the following elements:*

- 1) *Overview*
- 2) *Management And Organization*
- 3) *Monitoring And Discharge Characterization Program*
- 4) *Project Planning And Design*
- 5) *BMP Development*
- 6) *Construction*
- 7) *Maintenance Program Activities, including facilities operations*
- 8) *Non-Departmental Activities*
- 9) *Non-Storm Water Activities/ Discharges*
- 10) *Training*
- 11) *Public Education and Outreach*
- 12) *Region Specific Activities (See Section 5 and Attachment V)*
- 13) *Program Evaluation*
- 14) *Measurable Objectives*
- 15) *Reporting*
- 16) *References*

Source points should be identified. It is more the source than the BMP Best Practice Management that counts to actual reduction of pollutants. Any other State or CEQA required reports (mitigation and monitoring) should be submitted with this report.

Budgetary issues need to be addressed, so any Governing Body budgets should be submitted. There must be an ability to be executed for compliance, Certification would have to be by a signatory in authority, as a Governing Body.

The Governing Bodies should, with their approvals of any submission, include identifiable funding sources for execution and compliance.

Inspections would need to be with qualified personnel, subject under Public Health and Safety Codes. There should be a license or certification. Again, the Governing Body should approve the submittal, as they are the responsible Public Health and Safety Official.

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