



September 8, 2011

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000  
Via email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)



**Re: Comment Letter – Phase II Small MS4 General Permit**

Dear Board Members and Staff:

On behalf of The Otter Project and our affiliated water quality program Monterey Coastkeeper, we are writing with regard to the Draft Phase II Small MS4 General Permit. We appreciate the opportunity to comment on the Draft Permit.

We are frankly very disappointed in the tactics taken by some municipalities and the stakeholders involved in the Statewide Stormwater Coalition. Their efforts are clearly meant to weaken and delay implementation of this important general permit. As SWRCB members have pointed out, storm water is an incredibly important issue that must be addressed quickly – water quality is getting much worse in many areas.

We have offered our input and are in full agreement with the letter submitted today by the California Coastkeeper Alliance, NRDC, and others. Without repeating the points of that letter, we would like to offer our regional perspective and some additional points.

The Monterey Regional Storm Water Management Program has been implementing many of the management practices outlined in the Draft Phase II Small MS4 General Permit for the past five years. The Monterey Regional program includes monitoring, source tracking, inspections, source control, and public outreach. Although far from perfect, the Monterey Regional program is in many ways a case study showing that communities can implement a practical and affordable stormwater program.

Monitoring, source tracking, inspections, source control, and public outreach should remain the core of an effective program. We would caution that the public outreach component should be limited to a reasonably small portion of the program so that monies are available for “on the ground” solutions and improvements.

We would also like to bring to the Boards attention some nontraditional MS4s that may have been overlooked:

Airports. Many airports are vast areas of impervious surface that often drain into the stormwater system. As a private pilot myself, I am aware of just how dirty and contaminated airport ramps and runways really are. Oil, fuel, solvents, and cleaning chemicals are commonly spilled and otherwise discharged onto the paved surfaces and are ultimately discharged into the

stormwater system. Airports are sometimes special districts. Airports should be appropriately included as non-traditional MS4s and should fall under this permit.

Base Closure Reuse Authorities. We do not understand how unique our situation is, but the Fort Ord Reuse Authority (FORA) controls thousands of acres of land and developed areas once housing 15,000 soldiers plus heavy equipment, and associated infrastructure. We are aware of large construction projects that apparently fall outside the jurisdiction of the current Monterey Regional Storm Water Permit. There is massive infrastructure not transferred to any municipality and there is new construction before property is transferred. We believe there may be other military base closures throughout California that may be falling through this same regulatory gap.

We look forward to working with you and your staff to ensure the Final Permit will serve to protect California's water resources.

Sincerely,

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

Steve Shimek  
Chief Executive