



October 13, 2015



Ruben Mora, SWGP
Division of Financial Assistance
Storm Water Grant Program
State Water Resources Control Board
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ANDY RODGERS
Executive Director

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SUBJECT: Comments on Proposition 1 Storm Water Grant Program Guidelines – Public Review Draft August 2015

Dear Mr. Mora,

This letter presents comments from the Russian River Watershed Association (RRWA) on the Proposition 1 Storm Water Grant Program Guidelines and the associated Storm Water Resource Plan Guidelines released for public review in August 2015. These guidelines have implications for our member agencies and the Association as we plan to pursue Proposition 1 funding for water projects in the Russian River Watershed.

RRWA appreciates the opportunity to submit the following comments:

- 1) Add Planning funds to Round 2 to allow communities who were unable or unsuccessful at securing planning funds in Year 1 to receive grant funding support for the development of Storm Water Resource Plans in subsequent years. This would also allow adequate time for communities that do not already have approved plans to collaborate in the development of comprehensive and meaningful projects with multiple water quality benefits.
- 2) In order for applicants to submit Storm Water Resource Plans that adequately address all of the State Board's objectives, the guidelines must be clear and established in advance. Since this is not currently the case, we suggest that approval of a plan have the ability to be deferred through the grant agreement process. This would allow applicants the opportunity to submit Proposition 1 applications while in the Storm Water Resource Plan development process. This would also allow for a wider applicant pool and greater diversity of multi-benefit projects, ultimately achieving more water quality benefits.

- 3) Please provide a method for submittal and process for validation of a Storm Water Resource Plan. Please include a summary of roles, responsibilities, and authority associated with the validation process.
- 4) Provide clear guidance for adding or modifying projects once a Storm Water Resource Plan has been validated. It is expected that this is a continually improving process and there needs to be a clear mechanism for project flexibility and augmentation, using the latest scientific developments, best practices, and regulatory changes, to optimize effectiveness of multi-benefit projects.

Thank you for your consideration of these comments. If you have any questions or concerns about RRWA's comments, please do not hesitate to contact me at (707) 666-4812.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andy Rodgers', with a stylized flourish at the end.

Andy Rodgers, Executive Director, RRWA Board of Directors

cc: Russian River Watershed Association Board of Directors