



Santa Ana Watershed Project Authority

OVER 45 YEARS OF INNOVATION, VISION, AND WATERSHED LEADERSHIP



One Water One Watershed

AWRA INTEGRATED WATER RESOURCES MANAGEMENT AWARD
HARVARD KENNEDY SCHOOL'S TOP 25 INNOVATIONS IN AMERICAN GOVERNMENT

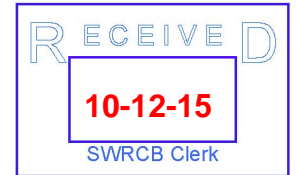
October 12, 2015

VIA EMAIL

commentletters@waterboards.ca.gov

Thomas P. Evans
Commission
Chair

Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Celeste Cantú
General
Manager

Re: Proposition 1 Stormwater Resource Plan and Grant Program Comments

Orange
County
Water
District

Dear Mr. Maguire,

We appreciate the opportunity to provide our input on the upcoming Proposition 1 Stormwater Resource Plan and Grant Program Guidelines administered by the CA State Water Resources Control Board (State Board). We are hopeful that you find these comments helpful from the Santa Ana Watershed Project Authority, SAWPA, the regional water management group for the Santa Ana Integrated Regional Water Management (IRWM) region and funding area.

Western
Municipal
Water District

Integrated Regional Water Management is, in our opinion, the most important strategy as we confront 21st Century water challenges. The implementation of the IRWM strategy is key if California is to thrive. Every opportunity needs to be taken to make the program accessible and used by all water resource managers particularly among stormwater managers. We believe with the Proposition 1 Stormwater grant program provides additional opportunities to assist stormwater management groups across the State to realize the vision of IRWM. Shown below are our comments on various draft guidelines for the Proposition 1 Stormwater Resource Plans and Stormwater Grant Program.

Eastern
Municipal
Water
District

- 1) Stormwater project selection based on watershed.** In Proposition 1 Chapter 7, Section 79742, a special call out was defined pertaining to the selection of projects for funding. It states that in selecting among proposed projects, including stormwater projects in a watershed, the scope of the adopted integrated regional water management plan may be considered by the administering state agency, with priority going to projects in plans that cover a greater portion of the watershed. If a plan covers substantially all of the watershed, the plan's project priorities shall be given deference if the project and plan otherwise meet the requirements of this division and the Integrated Regional Water Management Planning Act (Part 2.2 (commencing with Section 10530) of Division 6).

San
Bernardino
Valley
Municipal
Water
District

Inland
Empire
Utilities
Agency



This section also pertains to Section 79747(a) and was specifically inserted into Chapter 7 to encourage large scale projects, including stormwater projects in a watershed and ensure priority be given to those projects. It further states that if the plan's scope reflects a watershed view, its project priorities shall be given deference. This section, found in the law, should be considered as the State Board seeks to evaluate stormwater projects for grant funding. The guidelines for the Prop 1 stormwater grant program should recognize the important work of the local regional water management groups and reflect projects that are not just in a stormwater resource plan that have been fully evaluated and vetted under the IRWM project selection process and subject to their prioritization process to reflect "incorporation into the IRWM plan".

2) Draft Stormwater Resource Plan Guidelines, Section V(C) Submission to IRWM

Under SB 985, a requirement exists that a stormwater resource plan must be incorporated into the IRWM plan to receive grants for stormwater and dry weather runoff capture projects. Concern may arise by stormwater management agencies that if the existing IRWM does not include all the requirements for a stormwater resource plan, they may not be eligible to pursue funding for stormwater management projects under Prop 1 Chapter 7. We suggest that the State Board provide sufficient time to the stormwater management agencies and the Regional Water Management Groups (RWMGs) to work together to fully integrate the stormwater resources plans into the IRWM and that encouragement be provided to the stormwater agencies to collaborate on larger and watershed wide approach to multi-benefit projects. Merely submitting separate and disparate stormwater resource plans from the various public agencies interested in grant funding to the RWMG is not "incorporation into an IRWM" nor does it reflect the intent of IRWM. "Incorporating" the stormwater resource plan requires the involvement of both the RWMG and the stormwater resource plan developers collaborating together with other water resource entities on integrated multi-benefit stormwater projects that meet the goals and objectives of the IRWM and then reflect collaborative project solutions.

To address the stormwater resource plan requirement, SAWPA suggests that the State Board require a table indicating the applicant's status on progress on working on the stormwater resource plan with the RWMG and whether the plan "will meet" the specific SWRCB defined guidelines for the stormwater resource plan. In this fashion, stormwater and dry water capture projects that have been fully vetted by the local IRWM governance based on a previously adopted IRWM plan will not be held up from implementation and grant funding award. We recommend a one and a half year time frame be provided to RWMGs to fully incorporate the stormwater resource plan(s) into the IRWM as necessary to meet the new SB 985 and SWRCB requirements.

3) Draft Stormwater Resource Plan Guidelines, Section VI (A) Watershed Scale.

Under SB 985 and the draft guidelines, the stormwater resource plans must be developed on an appropriate geographic scale of watershed for storm water resource planning watershed based on guidance provided by the State Board. We fully support the caveat bullets in the guidelines that state the following:

2. The watershed should be the largest practicable to allow for comprehensive and integrated storm water management across multiple jurisdictional boundaries;

3. Plans should include multiple projects within the watershed to achieve watershed-based storm water management objectives, and should not be developed on a scale for the sole purpose of funding a single project;

5. Plans based on the IRWM group watershed boundary are preferred.

However, we do not believe the guidance that planning at the minimum of 5 square miles watershed size threshold is adequate to encourage collaboration and multi-benefit project development on a system-wide watershed scale as reflected in IRWMs. The Santa Ana River watershed is 2840 square miles in area and our IRWM plan, the SAWPA One Water One Watershed, reflects this watershed approach. Assuming that stormwater resource plans are developed by multiple entities in our watershed and such plans are developed using the 5 square mile minimum watershed scale, our RWMG could be receiving over 500 plans that are not integrated or collaborative in nature. We recommend that instead of merely stating a preference of larger scale watersheds, the State Board increase the minimum size to either the USGS definition of a watershed at 227 square miles or the Super Planning Watershed scale at 78 square miles.

We hope that you find these comments and suggestions helpful. If you have any questions regarding these comments, please let us know.

Sincerely,



Celeste Cantú
General Manager