



October 13, 2015

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

Subject: Comment Letter – Storm Water Resource Plan and Proposition 1 Funding Guidelines

It is not clear in the draft storm water Grant Program Guidelines whether floodwater capture for groundwater recharge in agricultural settings is an eligible activity. Storm water management has traditionally been thought of as a primarily urban issue. However, water quality, flood management, riparian corridor stability, and water supply can all be improved by expanding the scope of storm water planning to include agricultural lands as both a source of storm water and a place to capture and treat storm water. Inclusion of farmland in storm water management is an untapped opportunity that can help local agencies meet the requirements of the Sustainable Groundwater Management Act and is consistent with the goals of the guidelines to respond to climate change, contribute to regional water security, and contain multi-benefits.

There are many opportunities to capture storm water runoff from agricultural lands and construct recharge basins or spread the water back on working agricultural lands with highly permeable soils. These projects can be implemented either on dispersed individual private parcels to reduce runoff to public drainage infrastructure, or collectively among farmers within a subwatershed where drainage can be directed to suitable agricultural lands.

A second opportunity is to pull peak flood flows off of rivers and existing drainage channels and direct this water onto working farmland or dedicated recharge basins. Climate change is expected to increase the intensity of storm events leading to increased flooding, unstable riparian corridors, and water quality problems. Buffering peak storm water flows by reconnecting farmland to capture flood flows can have multiple benefits. Storm water capture projects can be in the form of increased irrigation conveyance capacity, dedicated recharge basins, or flood easements.

We suggest that the capture of storm water runoff from agricultural lands and the use of agricultural lands to capture and infiltrate floodwater be specifically called out as

eligible activities in the Guidelines to broaden consideration of projects that have the potential to help address the priorities of this program across entire watersheds.

Thank you for your consideration of these comments,

A handwritten signature in blue ink, reading "Daniel C. Mountjoy". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Daniel Mountjoy, Ph.D.  
Director of Resource Stewardship