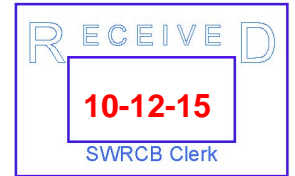


## commentletters

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**From:** Eric Osterling <eosterling@krcd.org>  
**Sent:** Monday, October 12, 2015 4:39 PM  
**To:** commentletters  
**Subject:** Comments: Draft Prop 1 SWGP and Draft SWRP Guidelines



To Whom It May Concern,

Thank you for the opportunity to comment on the Draft Proposition 1 SWGP and Draft Storm Water Resources Plan Guidelines. On behalf of the Kings Basin Water Authority (KBWA) and Kings Basin IRWMP stakeholders I offer the following:

We oppose any consideration of extending plan compliance requirements to projects that do not seek to capture “stormwater and dry weather runoff” as defined by SB 985. Extending the requirement to numerous unrelated project types that would otherwise be eligible for State Bond grant funding is unnecessary, and it would have unintended consequences for rural regions and isolated medium sized communities without the resources to cost share development of a plan.

Furthermore, we believe the primary intent of SB 985 is to improve stormwater and dry weather runoff management in regions of the state where historically the priority has been to discharge these flows to the ocean in-lieu of capturing them for beneficial use. We do not believe the author’s intent was to place costly and unnecessary requirements on inland, conjunctively managed, closed watershed basins that have long established records of intra-basin banking and recycling practices and we respectfully ask SWRCB staff to carefully consider regional applicability.

Thank you,

Eric C. Osterling  
Program Manager



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