



San Diego County Water Authority

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October 12, 2015

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

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- Yuima Municipal Water District
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- County of San Diego

RE: Comment Letter - Storm Water Resources Plan and Proposition 1 Funding Guidelines

Dear Ms. Townsend:

The San Diego County Water Authority (Water Authority) is a wholesale water agency serving 24 member retail water agencies and a population of 3.1 million people in San Diego County, California. Our current and future water supplies for the region include imported water from the Colorado River and Sacramento Delta, runoff captured in local surface water reservoirs, groundwater, potable and non-potable reuse, and brackish and seawater desalination. The member agencies develop local supplies including surface water, groundwater and recycled water (reuse). All of these diversified water supplies contribute to our overall water supply reliability and the economic vitality of the San Diego Region.

The Water Authority would like to offer the following comments on the Storm Water Resource Plan Guidelines and the Proposition 1 Grant Program Guidelines:

Incorporation into Integrated Regional Water Management Plans

Under SB 985, Storm Water Resource Plans must be submitted to any applicable regional water management groups (RWMG). The RWMG must incorporate those plans into its integrated regional water management (IRWM) plan. The Storm Water Resources Plans are similar to other planning documents that are considered by an RWMG when preparing and adopting an IRWM plan. The Water Authority, the city of San Diego and the county of San Diego comprise the San Diego IRWM Program. The San Diego RWMG supports the agencies preparing and adopting Storm Water Resource Plans. The Water Authority requests that the State Board allow IRWM planning regions to incorporate Storm Water Resource Plans into their IRWM plans by reference, similar to how other planning documents such as Urban Water Management Plans are

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incorporated. In addition, because an RWMG is not responsible for preparing or gaining approval for Storm Water Resource Plans, RWMGs should not be obligated to gain approval from the Department of Water Resources or the State Water Resources Control Board for incorporation of these plans into their IRWM plan.

Storm Water Guidelines Need to Consider Local Hydrogeology

The Guidelines appear to assume that there is uniformity in the rate and ability to percolate water into the various watersheds. In the San Diego region, unlike in some regions of California, there is very limited ability to percolate storm water. Existing groundwater basins are small and narrow, and much of the region's soils are made up of clay and rock that is not conducive to percolation. As a result, to maximize the use of this resource, water will need to be captured in local surface water reservoirs, treated at surface water treatment plants, and subsequently served as a potable drinking water supply. Some local reservoirs are located in watersheds with significant urbanization and agricultural operations. Water quality in these reservoirs is impaired by such land use activities. We request that the guidelines include capture in local reservoirs as surface water supply, and be noted as a contributing benefit. Surface capture of urban runoff requires a priority focus on improving water quality, including the reduction of nutrients. The benefit of surface water capture in augmenting potable water supplies should be addressed throughout this document.

Storm Water Plans Should Not Be Limited by Applicable NPDES and Waste Discharge Permits

The Guidelines require consistency with applicable NPDES and Waste Discharge Permits. Due to the construct of the Clean Water Act, NPDES and waste discharge permits include specific requirements for point discharge compliance that create impediments to watershed-based solutions. This precludes solutions that use centralized natural treatment systems, or capture options, which may be the most effective option to improve water quality and maximize the use of storm water resources. We recommend that the plans be given flexibility to invest in the most efficient and cost-effective solutions. The Water Quality Projects Analysis (pg 21-22) should include integrated projects outside the NPDES permit compliance, if these projects are more effective at capturing water or improving water quality. In addition, the analysis should allow for the use of natural treatment systems other than percolation, including wetlands, for improving water quality.

Proposition 1 Funding Guidelines

The Proposition 1, Chapter 7 funding round release dates are anticipated in spring 2016. This schedule may be difficult for agencies to meet to determine if existing Water

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Quality Improvement Plans (WQIPs) are functional equivalents, or if revisions to existing WQIPs will be necessary. We request that additional time be allocated if revisions to existing WQIPs are necessary or if a completely new Storm Water Resources Plan (SWRP) is required.

We also support the one-page "Statement of Certification" discussed at the State Water Resources Control Board (SWRCB) workshop held in Orange County in September. The funding process will be expedited if an agency may submit its SWRP, or functional equivalent, to the appropriate RWMG through a "Statement of Certification" approval mechanism and the RWMG may incorporate the SWRP "by reference" into its IRWM Plan.

We appreciate the opportunity to comment on these issues. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743 or Maria Mariscal at (858) 522-6746.

Sincerely,



Mark Stadler
Principal Water Resources Specialist
San Diego County Water Authority

Cc: Sean Maguire, Program Manager, State Water Resources Control Board