



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

Public Comment
SWRP & Prop 1 Funding Guidelines
Deadline: 10/13/15 by 12:00 noon

October 13, 2015



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

Dear Ms. Townsend:

Re: Comment letter – Public Review Draft
Proposition 1 Storm Water Grant
Program Guidelines & Draft Storm
Water Resource Plan Guidelines

Riverside County is the fourth largest county in the state with a population of 2.3 million containing 28 cities and stretching nearly 7,300 square miles of fertile river valleys, low deserts, mountains, foothills and rolling plains and covers three watersheds: Santa Ana, Santa Margarita and Whitewater.

The Riverside County Flood Control and Water Conservation District serves as the Principal Permittee for the three MS4 permits and works with our Co-permittees to implement the requirements of the Clean Water Act and develop stormwater management programs.

Proper management of stormwater resources and its infrastructure is critical for the health and economic prosperity of our region and the state. We support the Draft Funding Guidelines' eligibility requirements that encourage projects and plans that support sustainable, watershed-wide, multi-benefit stormwater management practices.

We offer the following comments on the proposed Guidelines:

1. The Draft SWRP Guidelines set a minimum collection of the 85th percentile 24-hour storm first flush event for the Storm Water Resource Plan. This is inappropriate for a watershed-wide plan. The Guidelines should only require that the SWRP and its storm runoff collection facilities demonstrate measurable metrics for the benefits indicated in Table 3 of the SWRP Guidelines.
2. In the Draft Grant Program Guidelines it states that the State Water Board wants to ensure that sufficient time is provided for those that need to prepare and complete their SWRP. However, those that need time to complete the SWRP also miss out on half of the implementation funds to be appropriated by the State Legislature. In the interest of fairness we suggest that the funding availability be adjusted to allow the preponderance of the implementation funds to be awarded in 2018.

Ms. Jeanine Townsend

- 2 -

October 13, 2015

Re: Comment letter – Public Review Draft
Proposition 1 Storm Water Grant
Program Guidelines & Draft Storm
Water Resource Plan Guidelines

We appreciate the opportunity to comment on both of the Draft Guidelines. Please contact Stuart McKibbin at 951.955.1273 should you need clarification on the comments.

Very truly yours,



WARREN D. WILLIAMS
General Manager-Chief Engineer

c: SAWPA
Attn: Celeste Cantu

DK:SEM:bjp
P8/200282