



## San Diego County Water Authority

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July 24, 2015

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

### MEMBER AGENCIES

- Carlsbad Municipal Water District
  - City of Del Mar
  - City of Escondido
  - City of National City
  - City of Oceanside
  - City of Poway
  - City of San Diego
  - Fallbrook Public Utility District
  - Helix Water District
  - Lakeside Water District
  - Olivenhain Municipal Water District
  - Otay Water District
  - Padre Dam Municipal Water District
  - Camp Pendleton Marine Corps Base
  - Rainbow Municipal Water District
  - Ramona Municipal Water District
  - Rincon del Diablo Municipal Water District
  - San Dieguito Water District
  - Santa Fe Irrigation District
  - South Bay Irrigation District
  - Vallecitos Water District
  - Valley Center Municipal Water District
  - Viola Irrigation District
  - Yuima Municipal Water District
- OTHER REPRESENTATIVE**
- County of San Diego

**Re: Comments regarding the Storm Water Strategic Initiative Proposal to Develop a Storm Water Program Workplan and Implementation Strategy**

Dear Ms. Townsend:

The San Diego County Water Authority appreciates the opportunity to comment on the State Water Resources Control Board's ("State Board") Proposal to Develop a Storm Water Program Workplan and Implementation Strategy ("Storm Water Proposal"). The Water Authority is a wholesale water supplier serving 24 member agencies in San Diego County. We would like to offer comments on the following important guiding principles:

**Guiding Principle 1: The Water Boards' Programs Treat Storm Water as a Valuable Resource**

The Water Authority is interested in the connection between storm water and water supplies. In San Diego we have small groundwater basins, so the majority of storm water capture in the region is through local surface water reservoirs. The Water Authority encourages the State Board to more actively engage water agencies as it continues the development of the Storm Water Proposal. Water agencies have had limited involvement to date in the development of the Storm Water Proposal, but are critical to the success of the goal of maximizing storm water capture for reuse. The utilization of storm water as a water supply resource will require water agency input on matters with statewide legal and policy implications, as well as water agency expertise on regional and local-scale technical and cost-effectiveness issues. Understanding the local hydrogeology is critical when determining the best approach to capture storm water. Water suppliers are experienced in capturing water for use and often have a good understanding of the local hydrogeology. To ensure that these critical issues are addressed in a timely and effective manner, the State Board should increase its outreach to water agency stakeholders moving forward.

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**Guiding Principle 2: The Water Boards' Storm Water Programs Should Preserve Watershed Processes to Achieve Desired Water Quality Outcome**

We support developing solutions using a watershed based approach and encourage the State Board to engage the Integrated Regional Water Management Programs (IRWMPs) in a discussion on the preservation of watershed processes to achieve desired water quality outcomes. IRWM planning on a watershed basis and IRWM funded projects can help provide a foundation for watershed-based solutions. As an example, the San Diego IRWMP helped fund watershed-based studies and solutions in the Santa Margarita, San Dieguito and the Chollas Creek Watersheds. In the San Diego Region, watershed-based solutions are necessary to improve water quality in reservoirs that have been degraded by urban and agricultural runoff. With the increasing focus on algae toxins, the control of nutrients in our water supplies is becoming an even more important issue. The traditional end of pipe compliance requirements for storm water agencies has been a significant impediment for dischargers to participate in watershed-based solutions. The watershed based approach should recognize the importance of controlling nutrients and provide regulatory flexibility to give credit to dischargers that participate in use of centralized best management practices.

Thank you for the opportunity to comment on this important initiative. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743.

Sincerely,



Robert Yamada  
Director of Water Resources  
By email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)