

MONTEREY REGIONAL STORM WATER MANAGEMENT PROGRAM



July 24, 2015

Chairperson
Tom Harty

Vice-Chairperson
Scott Ottmar

Member Entities

City of Pacific Grove

City of Monterey

City of Sand City

City of Seaside

City of Del Rey Oaks

County of Monterey

City of Carmel-by-the-Sea

**Other Participating
Entities**

Pebble Beach Company

Monterey Peninsula
Unified School District

Carmel Unified School
District

Pacific Grove Unified
School District

Program Manager

Monterey Regional Water
Pollution Control Agency

5 Harris Court, Bldg. D
Monterey, CA 93940

Attn:
Jeff Condit
(831) 645-4621

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

Re: Comment Letter – Proposal to Develop a Storm Water Program Workplan and Implementation Strategy

Dear Ms. Townsend,

The Monterey Regional Storm Water Management Program (MRSWMP) Management Committee has been pleased to participate in the Strategic Stormwater Initiative to date and appreciated the opportunity to provide feedback to State Water Board representatives during the August 13, 2014 outreach session held at Salinas City Hall.

The Management Committee applauds the State Water Board's effort to formulate a long term vision for the statewide stormwater program that optimizes its effectiveness. We respectfully submit the following comments regarding the Proposal to Develop a Storm Water Program Workplan and Implementation Strategy:

- We appreciate the priority placed on Project 8, *Funding for Storm Water Programs*. The State Water Board should play a leadership role in promoting the concept that stormwater is a utility and supporting efforts to amend Proposition 218.
- The State Water Board should recognize cost factors as an important component of technical feasibility during evaluations of permit requirements.
- We support the efforts described in Project 21, *True Source Control and Pollution Prevention*, and encourage the State Water Board to place a higher priority on this project, recognizing that receiving waters are often influenced by factors that are outside the control of MS4s and best addressed via statewide controls.
- Project 14 should include provisions that allow for the refinement of stormwater permit requirements, assisting MS4 Permittees in de-prioritizing or eliminating elements that do not result in effective water quality outcomes, thus allowing Permittees to focus constrained resources on elements that will result in the greatest water quality outcomes.
- There is a need for consistency across the state as to how the Stormwater Permit is interpreted by Regional Boards. The current model has led to inconsistencies with regard to the implementation of permit requirements. We support efforts to enhance collaboration between the Regional Water Boards, the State Water Board, and other state departments to effectively implement permit requirements.

Thank you for considering these comments on the Proposal to Develop a Storm Water Program Workplan and Implementation Strategy. Please feel free to contact me if you would like further information.

Sincerely,

A handwritten signature in blue ink that reads "Tom Harty".

Tom Harty

Chair, Monterey Regional Storm Water Management Program