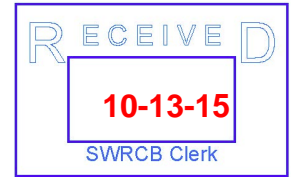


## MONTEREY REGIONAL STORM WATER MANAGEMENT PROGRAM



October 13, 2015

**Chairperson**  
Tom Hartly

**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 – Storm Water Resource Plan and Proposition 1 Funding Guidelines

Dear Ms. Townsend,

The Monterey Regional Storm Water Management Program (MRSWMP) respectfully submits the following comments regarding the Stormwater Resource Plan and Proposition 1 Funding Guidelines. We appreciate this opportunity to provide our input.

Regarding the draft Storm Water Grant Program Guidelines, we are concerned that the high match requirement (50% of the total project cost) will prevent some entities from being able to take advantage of this important source of funds. We understand that the State Board is unable to reduce the match requirement from 50% due to legislative mandate; however, if possible, we request that: 1) the match be 50% of the *requested grant amount*, rather than the total project cost, and 2) eligible match for implementation projects include reimbursable expenses after approval of Proposition 1, November 4, 2014 (rather than after adoption of the Prop 1 SWRP Guidelines, December 1, 2015).

Since most public agencies seeking to apply for storm water and dry weather runoff project grant funds will presumably need to develop Storm Water Resource Plans (i.e., will not be able to submit Functionally Equivalent Plans), we recommend that the State Board consider holding back more of the funds to Round 2 (for example, \$40 million available in Round 1, \$126 million available in Round 2), in order to give agencies time to develop their plans. Furthermore, we recommend a longer lead time for the Round 1 solicitation, to give applicants the time they will need to meet the Storm Water Resource Plan requirements.

We request the consideration of geographic allocation guidelines to ensure the equitable distribution of Proposition 1 funds across the state.

We are concerned about the large scoring weight given to the Multi-Benefit components of projects (25%). Our experience with past solicitations has shown that this type of requirement can lead to overly complex projects attempting to highlight multi-benefit elements.

As some of our members are covered under the ASBS Special Protections, we appreciate the inclusion of an additional \$25m to support ASBS projects. We feel this amount will assist in supporting the substantive compliance measures necessary to meet the numeric effluent limitations of the ASBS Special Protections. Although we are concerned that the inclusion of this amount under the current Proposition 1 solicitation will lead to the inclusion of the burdensome 50% match requirement required due to legislative mandate. We request a separate ASBS solicitation to distribute this \$25m fund if feasible.

Thank you for considering these comments on the Stormwater Resource Plan and Proposition 1 Funding Guidelines. Please feel free to contact me if you would like further information.

Sincerely,

A handwritten signature in blue ink that reads "Jeff Condit". The signature is written in a cursive style with a prominent loop at the end of the last name.

Jeff Condit  
Program Manager, Monterey Regional Storm Water Management Program