

Water Resources Management
23829 NE Greens Crossing Road
Redmond, WA 98053



October 12, 2015

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

Subject Comment Letter – Storm Water Resources Plan and Proposition 1 Funding Guidelines

Dear Ms. Townsend;

Following are comments and recommendations regarding the Storm Water Resource Plan Guidelines:

Comment 1: Definition of Sustainable – The definition should include a statement that the Benefit Projects must be designed, constructed, operated, maintained and rehabilitated for a period of 25-years and preferably for a period of 50-years. A major commitment of State Funds should require that projects provide significant long term improvements and protection to the State’s water supplies.

Comment 2: Federal Underground Injection Control Program - The Federal Safe Drinking Water Act (SDWA) regulates storm water drainage devices as Class V Wells. Class V wells are authorized by rule so long as the injection does not endanger an underground source of drinking water. Class V wells include a drilled, driven or dug hole or trench that is deeper than wide. The program is administered in California by USEPA that has established minimum standards (BMPs) and requires there registration.

The following additions should be included in the Guidelines:

- Acronyms and Key Words - SDWA and UIC should be listed;
- Definition – provide a description of Class V Wells;
- Sections V.B. and V.D. – add to statements that Plan should be consistent with and implemented in accordance with the Federal Safe Drinking Water Act Underground Injection Program;
- Appendix A-1 – Add a “box” and “A description of how the Plan is consistent with the Federal Safe Drinking Water Act Underground Injection Program;
- Appendix A-3 - Watershed Identification – Add to guideline that identifies potable water suppliers and the relative volumes of “surface and ground water” potable
- Appendix A-4 – Quantitative Methods – Add to water quality analysis “compliance with Federal Safe Drinking Water Act Underground Injection Program” and “iii. Estimate of total number of Class V Wells and percent in compliance with UIC.”
- Appendix B – Add “Federal Safe Drinking Water Act Underground Injection Program” and its web site and web link.

Comment 3: Description of Groundwater Basins – Section VI.A. – The Storm Water Resource Plan should include the water supply uses, recharge zone boundaries, users, well locations, current and historic water levels, list of agencies responsible for basin management, etc in addition to groundwater basin boundaries.

Comment 4: Prioritization of Runoff Capture Projects – Section VI.C.1. – In addition to establishing guidance for prioritizing projects the State Board should state its priority for use of State funds. Those projects that optimize water supplies in watersheds that are experiencing significant shortages or overdraft should receive funding priority while storm water runoff treatment projects with limited potential for capture and reuse of the runoff should receive lowest priority. The State Board should resist allocating State funds to those small scaled projects (like catch basin inserts) that are relatively easy to install, but are proving to be unsustainable and not cost effective in the long term. Recommend deletion of the reference to catch basin inserts in VI.C.2.b.ii.d. since they are not major existing structural controls.

Comment 5: Plan Implementation VI.E.2. – The Storm Water Resources Plan must also include the operation, maintenance and rehabilitation components necessary to ensure the “long term” sustainability of the funded projects.

Comment 6: Implementation Performance Measures– Section VI.E.3. - The implementation performance measures elements should include project operation programs and procedures, maintenance programs and rehabilitation alternatives and procedures. The successful performance of the type of projects considered for funding will require extensive ongoing operation and maintenance and in some cases periodic rehabilitation. These programs should be identified and developed so that long term funding commitments can be understood.

Sincerely,

Roger B. James
Senior Consultant