

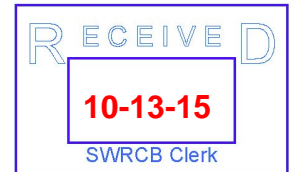


CITY OF SANTA MARIA
UTILITIES DEPARTMENT
Business Services • Regulatory Compliance
Solid Waste Services • Water Resources

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October 13, 2015

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



VIA EMAIL [commentletters@waterboards.ca.gov]

**SUBJECT: COMMENT LETTER – STORM WATER RESOURCE PLAN
AND PROPOSITION 1 FUNDING GUIDELINES**

Dear Ms. Townsend,

The City of Santa Maria ("City") appreciates the opportunity to review and comment on the Storm Water Resource Plan and Proposition 1 Funding Guidelines ("Guidelines"). The City would like additional clarity regarding how the procedural and content requirements for a Storm Water Resource Plan apply to the use of existing planning documents as the functional equivalent of a Storm Water Resource Plan.

Water Code § 10562 establishes the mandatory elements of a Stormwater Resource Plan, such as: development on a watershed basis (Water Code § 10562(b)(1)); community participation in plan development and implementation (Water Code § 10562(b)(4)); submission of the Stormwater Resource Plan to the integrated regional water management program and incorporation into the integrated regional water management plan (Water Code § 10562(b)(7)); prioritization of the use of lands or easements in public ownership for stormwater and dry weather runoff projects (Water Code § 10562(b)(8)); projects and programs to ensure the effective implementation of the Stormwater Resource Plan (Water Code § 10562(d)(8)); and ordinances or other mechanisms necessary to ensure the effective implementation of the Stormwater Resource Plan (Water Code § 10562(d)(9)).

As an alternative to having a new Stormwater Resource Plan that meets the mandatory elements described above, existing planning documents may be utilized as a functional equivalent to a Stormwater Resource Plan. Examples of existing planning documents include urban water management plans, among others. If an existing planning document does not meet the standards of Water Code § 10562, a collection of local and regional plans may constitute a functional equivalent, if the plans collectively meet all of the requirements of that section.

It is unclear whether all requirements of Water Code § 10562 apply to all existing planning documents when an agency uses a collection of plans as the functional equivalent to a Stormwater Resource Plan. For example, it is unclear whether each plan in the collection must be developed on a watershed basis. By way of illustration, an urban watershed management plan is not required to be developed on a watershed basis (see Water Code § 10630 et seq.) but is listed as an example of an existing planning document that may satisfy the requirements of Water Code § 10652. It is also unclear whether each plan must be incorporated into the integrated regional water management plan, whether each plan's development and implementation must include community participation, and whether each plan must address all nine elements under subdivision (d).

As the City has informed the State Board in other contexts, the City is actively pursuing, with EPA support, the development of an Integrated Plan. The City's Integrated Plan is intended to outline how the City will satisfy all of its water quality requirements, including through projects that treat stormwater as a resource. The City's Integrated Plan, individually or coupled with other planning documents, is intended to guide the City's future management of its stormwater program and other water quality efforts. The City would like the ability to use the Integrated Plan as a basis for seeking funding, including Proposition 1 funding.

The City is grateful for the opportunity to provide these comments on the Guidelines and believes that grant applicants will benefit from additional clarity regarding the applicability of each requirement in Water Code § 10652 to a collection of plans that are used as the functional equivalent of a Stormwater Resource Plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'SHAD S. SPRINGER', with a stylized flourish at the end.

SHAD S. SPRINGER, P.E., MPA

Director of Utilities