



Big Sur Land Trust • California State University Monterey Bay • California Water Service Company • Castroville Community Services District • City of Salinas • City of Soledad • Elkhorn Slough National Estuarine Research Reserve • Environmental Justice Coalition for Water • Garrapata Creek Watershed Council • Marina Coast Water District • Monterey Bay National Marine Sanctuary • Monterey County Agricultural Commissioner's Office • Monterey County Water Resources Agency • Monterey Regional Water Pollution Control Agency • Moss Landing Marine Laboratories • Resource Conservation District of Monterey County • Rural Community Assistance Corporation • San Jerardo Cooperative, Inc.

October 13, 2015

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



Re: Comment Letter – Storm Water Resource Plan and Proposition 1 Funding Guidelines

Dear Ms. Townsend,

On behalf of the Greater Monterey County IRWM Regional Water Management Group, I would like to submit the following comments regarding the draft Storm Water Resource Plan and Proposition 1 Storm Water Grant Program Guidelines. We appreciate this opportunity to provide our input.

The Greater Monterey County Regional Water Management Group strongly supports the State Water Resource Control Board's new watershed approach to storm water management, which aims to maximize benefits for water supply, water quality, flood management, and natural ecosystems. This multi-benefit approach to storm water management epitomizes what we aim to achieve through integrated regional water management.

In general, the Storm Water Resource Guidelines appear reasonable and helpful for developing a meaningful Storm Water Resource Plan on a watershed scale. However, we do have concern about the metrics-based analysis required for identifying and prioritizing storm water and dry weather runoff capture projects. While there is no question that this level of analysis would provide valuable information, the amount of staff time and financial resources required to perform such a rigorous analysis should not be underestimated. Public agencies are already stretched thin; the benefits of conducting such a high-level quantitative analysis would not seem to outweigh the tremendous costs it would take to perform such a high level of analysis, particularly when a less rigorous analysis would likely yield comparable results in terms of directing the region toward project implementation. We therefore recommend including less stringent quantitative requirements for identifying and prioritizing storm water and dry weather runoff capture projects, and allowing for more qualitative analysis.

Secondly, we have noticed that the Guidelines do not outline a process for approval of the Storm Water Resource Plans. Since timing will be of the essence, we recommend a streamlined process whereby the applicant can use a simple checklist to demonstrate compliance with the Guidelines.

In regard to 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, particularly smaller agencies and non-profits, 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). Also, please clarify that funding match may include federal grants (not just federal loans).

Regarding the match requirement for disadvantaged communities (DACs), we recommend eliminating the match requirement altogether for DACs, or at minimum, eliminating the tiered system. It is unlikely that a large DAC (greater than 20,000 population) can contribute 15% match any more than a small DAC can. Even 5% match may be infeasible for a DAC of any size. If it is impossible to eliminate the DAC match requirement, we recommend the lowest match (5%) for both severe DACs and DACs, regardless of their population.

Finally, 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.

Thank you for the opportunity to submit our comments. We appreciate the State Water Board's effort in developing these guidelines and the new direction that the Storm Water Program is taking, and we look forward to implementing storm water and dry weather runoff capture projects that will yield multiple, integrated benefits for the Greater Monterey County IRWM region. Please feel free to contact me at (828) 337-9805 or [srobinsons@frontier.com](mailto:srobinsons@frontier.com) if you have any questions or would like to discuss this further.

Sincerely,

A handwritten signature in cursive script that reads "Susan Robinson".

Susan Robinson  
Coordinator for the Greater Monterey County IRWM Program