



# County of San Diego



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October 13, 2015

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

Electronic Submission: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Dear Ms. Townsend:

## COMMENT LETTER - STORM WATER RESOURCES PLAN AND PROPOSITION 1 FUNDING GUIDELINES

The County of San Diego Watershed Protection Program (WPP) thanks the State Water Resource Control Board for the opportunity to comment on the draft Storm Water Resource Plan Guidelines. The County's WPP has the following issues and comments for the draft Guidelines.

### Timeframe

The guidelines as written do not provide sufficient time for local jurisdictions to develop a Storm Water Resource Plan (SWRP) or update existing plans to become 'functionally equivalent' to a SWRP. In order to compete for funding from the first round of Proposition 1 Funding, jurisdictions would have to have a SWRP or functional equivalent in place prior to Spring 2016, when the grant solicitation is expected. Jurisdictions must be given adequate time to plan and budget for the expense of preparing a SWRP.

From Section 1: Purpose of the Guidelines, "*Water Code section 10563, subdivision (c)(1), requires a Storm Water Resource Plan (Plan) as a condition of receiving funds for storm water and dry weather runoff capture projects from any bond approved by voters after January 2014. This requirement applies to Proposition 1, the water bond measure approved by voters in November 2014, which authorized \$200 million in grants for multi-benefit storm water management projects.*"

### **Recommendation**

We have two recommendations to address the above concern. First, since existing Water Quality Improvement Plans (WQIPs) recently prepared in response to Municipal Stormwater Permit requirements would need to be analyzed with respect to the final Guidelines to determine whether they meet the intent of a SWRP, we request an extension of the initial solicitation for

grant funds beyond spring of 2016. This would provide additional time for agencies to determine whether planning grant funds would be needed to bring existing plans and documents into conformance with the Guidelines.

Second, we request an allowance for Proposition 1 planning grant funds to be used to update existing plans to meet the criteria of a SWRP or functional equivalent.

#### Determination of a SWRP or functionally equivalent plan

The draft Guidelines also provide that other types of plans (such as the San Diego Region's WQIPs) can be determined to be functionally equivalent SWRPs. Functional equivalency can be achieved through submittal of one or more documents that together meet the requirements of the Plan Guidelines. The Guidelines is silent on how the SWRPs or their functional equivalent will be accepted or approved, and by whom, prior to being incorporated into the local IRWM plans.

#### **Recommendation**

During the workshop in Orange County held September 30, 2015, state staff identified the possible use of a single-page certification sheet that could be used to identify WQIPs as meeting the criteria of the Guidelines and checklist contained therein. We recommend that the lead agency developing the SWRP or functional equivalent plan be able to self-identify that the plan meets the criteria identified in the Guidelines. We also request that the updated Guidelines clearly articulate the updated Guidelines.

Finally, we agree with the San Diego County Water Authority (CWA), who is the lead agency managing the IRWM for the San Diego Region, that SWRPs or their functional equivalent should be incorporated into the local IRWM plans by reference. Rationale for this includes:

- The San Diego IRWM management team (in San Diego known as the Regional Water Management Group or RWMG) is not responsible for preparing or gaining approval for SWRPs, and should not be obligated to gain approval from the Department of Water Resources or the State Water Resources Control Board for incorporation of these plans into the IRWM Plan.
- Local WQIPs (of which there will be 10 developed in the San Diego Region) contain a requirement for adaptive management; therefore, the possibility that one or several plans may be updated on an annual basis exists. If incorporated wholly into the IRWM plans, a change to a single WQIP would require a change to the IRWM plan. Incorporating plans by reference eliminates an unnecessary and possibly costly task.

#### Consistent use of common terminology

The Guidelines use some common terms interchangeably and inconsistently for which there are industry standard terms. These terms include "use" as opposed to "reuse" when referring to "stormwater capture and use", and "pervious" or "impervious" as opposed to "permeable" and "impermeable" when describing different types of surfaces for infiltration.

#### **Recommendation**

We request consistency in the use of the aforementioned terms. For reference, please see the San Diego Region Municipal Stormwater Permit (NPDES R9-2013-0001 as amended by R9-2015-0001) and the Model Water Efficient Landscape Ordinance (MWELO) both of which use the term "pervious" and "impervious", as opposed to "permeable" and "impermeable".

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We thank you for the opportunity to provide these comments. If you have any questions or require additional information, please contact Stephanie Gaines, Project Coordinator, at (858) 694-3493 or by e-mail at [Stephanie.Gaines@sdcounty.ca.gov](mailto:Stephanie.Gaines@sdcounty.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Todd E. Snyder". The signature is fluid and cursive, with the first name "Todd" being the most prominent.

TODD E. SNYDER, Manager  
Watershed Protection Program

cc: Mark Stadler, San Diego County Water Authority