



City of Hermosa

Civic Center, 1315 Valley Drive, Hermosa Beach, CA 90254-3885

October 12, 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
Delivered by noon on 10/13/2015

Comment Letter—Storm Water Resource Plan and Proposition 1 Funding Guidelines

Dear Members of the State Water Resources Control Board:

The City of Hermosa Beach appreciates the opportunity to provide comments on the Draft Storm Water Resource Plan Guidelines (Plan Guidelines) and Draft Proposition 1 Storm Water Grant Program Guidelines (Funding Guidelines). We also appreciate the State Water Resource Control Board (State Board) staff's time in providing public outreach meetings to assist interested parties in understanding the intent and objectives behind both the Plan Guidelines and the Funding Guidelines. Our representative attended the meeting held on September 30th in Fountain Valley and found it to be very helpful and informative.

We offer the following comments and suggestions with respect to both the Plan Guidelines and the Funding Guidelines:

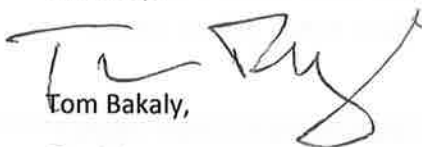
1. We appreciate the State Board staff's recognition that Enhanced Watershed Management Programs (EWMPs) are vitally important planning documents for the watershed groups within the Los Angeles Region and that they may be utilized as functionally equivalent documents for Storm Water Management Plans. Our watershed group has expended significant resources and effort over the past two years in developing an EWMP that is consistent with the intent of SB 985. We recommend that EWMPs approved by the Los Angeles Regional Water Quality Control Board be considered in the Plan Guidelines as functionally equivalent plans that meet the minimum requirements of a Storm Water Resource Plan.
2. While we agree that stormwater capture and use projects should include a demonstration that individual projects have to the extent feasible maximized the capture of storm water and dry weather runoff for the tributary area, we do not believe it is practical to set a specific numeric requirement for a design storm and that such a numeric requirement would exclude a multitude of very worthy projects and as a result the Storm Water Resource Plans would be less effective in achieving the goals of SB 985.
3. For grant application purposes we recommend that a proposed implementation project which is included in a Regional Board-approved EWMP that has also been submitted to the appropriate

IRWMP group should be considered to have met the eligibility requirement that the project has been included in an adopted IRWMP.

4. We would also like to suggest that for a project to be considered “included in a Stormwater Resource Plan”, be it a functionally equivalent plan such as an EWMP or a plan developed according to the Plan Guidelines, the project need not be identified by exact name and location to be eligible for funding. Green street projects are examples of multi-benefit stormwater capture projects that may be included in a Stormwater Resource Plan or functionally equivalent plan as a general category of project within a particular watershed or subwatershed with an identified metric or quantitative goal for stormwater capture without specifying exactly where the project is to be implemented. Implementation details as to optimal siting of Green Street projects are more practically developed as part of preliminary design studies during implementation phase of Stormwater Resource Plans rather than at the time of plan development.
5. Large ambitious stormwater capture projects require a significant investment in planning and design studies prior to funding. We request that the State Board consider providing up to \$10 million of the \$20 million in SWGP Prop 1 grants for planning and design of multi-benefit stormwater projects to assist watershed groups who have already developed functionally equivalent stormwater resource plans in readying projects for future funding. These funds could be distributed within the same framework as the planning funds for development of Storm Water Resource Plans, i.e., with minimum grant amounts of \$100,000 and maximum amounts of \$500,000 per planning grant project.
6. Finally, we understand based on information shared at the September 30, 2015 workshop in Fountain Valley that the State Board is considering releasing \$25 million in unspent funds from previous Clean Beaches Initiative (CBI) and Areas of Special Biological Significance (ASBS) programs for funding under this Proposition 1 Stormwater Grant Program. We would respectfully request that this funding be made available for storm water projects wherever there are identified water quality impairments in recreational coastal waters, not solely in those areas designated as ASBS. The EWMPs developed within the Los Angeles Region have identified a significant need for stormwater capture projects to address water quality impairments outside of ASBS areas.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Bakaly', written in a cursive style.

Tom Bakaly,

City Manager