

# GATEWAY WATER MANAGEMENT AUTHORITY

Los Angeles Gateway Region  
Integrated Regional Water Management  
Joint Powers Authority

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October 8, 2015



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

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

Dear Ms. Townsend and Members of the Board:

Thank you for the opportunity to comment on the Draft Storm Water Resource Plan (“Stormwater Plan”) Guidelines and Draft Proposition 1 Storm Water Grant Program Funding Guidelines. The Gateway Water Management Authority (“GWMA”) is a Joint Powers Authority comprised of 25 cities and three large water agencies in Southeastern Los Angeles County.

The GWMA is responsible for coordinating and assisting with regional watershed programs, including the work of the four watershed groups in our region that recently completed their Watershed Management Programs (“WMPs”). After the Los Angeles Regional Water Quality Control Board (“LARWQB”) approved the WMPs earlier this year, the four groups are now working together on the implementation of those plans.

We appreciate the excellent information provided at the September 30<sup>th</sup> meeting by State Board staff, who allowed for ample discussion and dialogue by the attendees. Based on the staff presentation, we respectfully submit the following points:

- All applicants should be allowed to apply for DAC project status if a project is clearly located in and benefitting a DAC area as defined in the Guidelines. DAC project status should not be limited to DAC applicants only (*i.e.*, a JPA applicant on behalf of one or more of its DACs);
- To expedite an application’s eligibility for the upcoming round for Proposition 1 Storm Water Grant funding, GWMA supports:

**Christopher Cash, Board Chair • Adriana Figueroa, Vice-Chair • Charlie Honeycutt, Secretary/Treasurer • Kevin Wattier, Chair Emeritus**

Proudly serving Gateway cities and agencies in Southeastern Los Angeles County

Members: Artesia · Avalon · Bell · Bell Gardens · Bellflower · Central Basin Municipal Water District · Cerritos · Commerce · Cudahy · Downey · Hawaiian Gardens · Huntington Park · La Mirada · Maywood · Lakewood · Long Beach · Long Beach Water Department · Lynwood · Montebello · Norwalk · Paramount · Pico Rivera · Santa Fe Springs · Signal Hill · South Gate · Vernon · Water Replenishment District of Southern California · Whittier

With Technical Support From The Sanitation Districts Of Los Angeles County

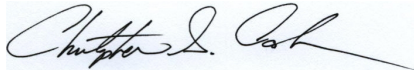
- The creation of a minimum criteria checklist. Specifically, the suggestion presented at the meeting was for the SWRCB to create a checklist to be signed by the applicant certifying that all legislative and SWRCB requirements had been met in the Storm Water Plan
  - The submittal of WMPs or EWMPs to one or more DWR-accepted IRWMPs for future inclusion as the required official step in order to meet the current Prop 1 Stormwater Grant schedule
  - Clarification that Watershed Management Programs approved by the Los Angeles Regional Water Board do not have to be amended to be deemed Storm Water Resource Plans consistent with the requirements of SB 985; rather, supplemental plans, reports, and/or technical memos will be allowed to address the differences in requirements of the WMPs and the Storm Water Management Plans. This will allow future changes/additions to the Storm Water Plan without affecting the WMPs;
  - Strengthening of the footnote on page 12 of the Storm Water Resources Plan Guidelines to say that WMPs and EWMPs are deemed equivalent to Water Resource Plans as long as the elements required by SB 985 that were not included in the WMPs are documented and explained.
  - Clarification that the Reasonable Assurance Analyses included in WMPs are recognized as constituting metric-based analyses.
  - Clarification that supplemental materials may be used to prioritize projects like green streets that were shown generally in WMPs and RAAs but not individually prioritized and specify substitute projects that will be included in WMPs when they are amended through the adaptive management process.
- GWMA suggests that the local match for implementation projects should allow costs incurred back to the date that SB 985 was signed by the Governor and filed with the Secretary of State (September 25, 2014). This is consistent with earlier grant programs and recognizes that Permittees have been working to prepare projects for grant funding.
  - GWMA recommends that ALL applicants eligible to receive Prop 1 funds, including NGOs and Private Water Utilities, be required to prepare a Storm Water Plan prior to applying for grants;
  - GWMA recommends that a portion of the Prop 1 grant funds be set aside to start a low interest stormwater revolving fund (no interest to be charged for DAC projects)

that would not have to meet EPA's requirement for a dedicated revenue stream for repayment;

- Due to the lack of planning/design funds that are necessary to prepare projects for implementation grants, GWMA strongly suggests that planning funds under the Prop 1 SW Grant be opened up to include funding for individual or regional planning projects. Currently, the planning grant funds would be dedicated to Storm Water Plan funds only which are higher level concepts that don't assist with the more specific project-level need for planning/design;
- GWMA does not support the current approach to the 85<sup>th</sup> percentile storm in the Storm Water Plan Guidelines. It is contrary to what many watersheds can actually capture and is difficult to accurately demonstrate from the collective performance of individual projects. Rather, the Watershed Management Program approach to the 85<sup>th</sup> percentile storm should be the basis for addressing the 85<sup>th</sup> percentile storm in the Guidelines since the Los Angeles MS4 Permit "contains provisions to encourage, where feasible, retention of the storm water from the 85<sup>th</sup> percentile storm event" and the runoff from the 85<sup>th</sup> percentile storm event is the storm water quality design volume for designing structural best management practices.

Again, thank you for the opportunity to provide comments on the draft guidelines. Please don't hesitate to contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher S. Cash", is written over a light blue rectangular background.

Christopher S. Cash  
GWMA Chair