



GAIL FARBER, Director

# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

*"To Enrich Lives Through Effective and Caring Service"*

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IN REPLY PLEASE  
REFER TO FILE: **WM-6**

October 13, 2015

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

### **COMMENT LETTER – STORM WATER RESOURCE PLAN AND PROPOSITION I FUNDING GUIDELINES**

Dear Ms. Townsend:

The County of Los Angeles (County) and the Los Angeles County Flood Control District (LACFCD) appreciate the opportunity to provide comments on the Draft Storm Water Resource Plan Guidelines and the Draft Proposition I Storm Water Grant Program Funding Guidelines (Draft Guidelines).

The Draft Guidelines establishes the process and criteria that the State Water Resources Control Board (State Board) will utilize to solicit applications, evaluate and select proposals, and award grants funding of multi-benefit storm water management projects via Proposition I (Prop-I). According to the Draft Guidelines, the development of a Storm Water Resource Plan is required to receive a Prop-I grant. In addition, pursuant to the Draft Guidelines, existing planning documents, such as Watershed Management Program (WMP) and Enhanced Watershed Management Program (EWMP) plans as set forth in the 2012 Los Angeles County MS4 Permit are considered functionally equivalent to the Storm Water Resource Plan.

The County and LACFCD appreciate the State Board's recognition of WMP and EWMP plans in the Los Angeles Region. The WMP and EWMP plans incorporate multi-benefit projects aimed at capturing, treating, reusing, and infiltrating stormwater runoff to not only improve water quality, but also augment groundwater supply and enhance flood control and recreational opportunities. Accordingly, the County and LACFCD request that upon the approval of WMP and EWMP plans by the Los Angeles Regional Water Quality Control Board (Regional Board), the subject WMP or EWMP plans be automatically deemed functionally equivalent and, thus, in full compliance with the requirement of the Draft Guidelines. For WMP or EWMP plans that have been submitted, but yet to be approved by the Regional Board by the time Prop-1 funding solicitation is released, the County and LACFCD request that the State Board allow for those WMP or EWMP groups to self-certify, based on their professional judgement, that their plan(s) meet the requirements of the Draft Guidelines and, thus, are functionally equivalent.

The County and LACFCD appreciate the clarification provided by State Board on September 30, 2015, regarding the incorporation of the Storm Water Resource Plan into an Integrated Regional Water Management Plan (IRWMP). State Board staff communicated that the submission of WMP and EWMP plans to the appropriate IRWMP group would meet this specific grant requirement. We request this clarification be incorporated into the final guidelines, as appropriate. We also request that the guideline allow the IRWMP groups to incorporate the WMP and EWMP plans into IRWMP by reference to the extent that the IRWMP groups find the WMP and EWMP plans consistent with IRWMP.

California is in the midst of a four year drought and stormwater is an essential component of the State's drought mitigation portfolio. One of the primary methods to capture and store stormwater is to utilize dams. Over time, sediment accumulates behind these facilities and reduces their ability to store water both for water supply and for flood protection. Sediment management projects are critical to the region's flood protection and water supply. The LACFCD requests that sediment management projects be listed in Section G - Program Preferences of the Grant Program Guidelines as a multi-benefit storm water management project that is eligible for grant funds.

Finally, the Multiple Benefit Scoring Criteria, as outlined in Implementation Proposal Evaluation Scoring Criteria (#9) of APPENDIX C-2, indicates the possibility of two different maximum points: 20 points and 25 points. We request that the point totals be clarified.

Ms. Jeanine Townsend  
October 13, 2015  
Page 2

If you have any questions, please contact me at (626) 458-4300 or [ageorge@dpw.lacounty.gov](mailto:ageorge@dpw.lacounty.gov) or your staff may contact Mr. Paul Alva at (626) 458-4325 or [palva@dpw.lacounty.gov](mailto:palva@dpw.lacounty.gov).

Very truly yours,

GAIL FARBER  
Director of Public Works



ANGELA R. GEORGE  
Assistant Deputy Director  
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