



Association of California Water Agencies

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(12/1/15) Board Meeting
Storm Water Strategy
Deadline: 11/16/15 by 12:00 noon



Sent via ELECTRONIC MAIL to commentletters@waterboards.ca.gov

November 16, 2015

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

Re: Association of California Water Agencies' Comments regarding the Draft Strategy to Optimize Resource Management of Storm Water

Dear Ms. Townsend:

The Association of California Water Agencies (“ACWA”) appreciates the opportunity to comment on the State Water Resources Control Board’s (“State Board”) draft Strategy to Optimize Resource Management of Storm Water (“Storm Water Strategy,” or “Strategy”). ACWA represents nearly 430 public water agencies that collectively supply approximately 90% of the water delivered for domestic, agricultural and industrial uses in California. California water agencies utilize a variety of methods to augment water supplies, including storm water capture, and ACWA supports the development of programs and policies that can help improve regional water supply reliability as well as the environment.

ACWA supports the Storm Water Strategy’s vision and mission’s emphasis on treating storm water as a valuable water resource. Many water agencies have decades of experience in the effective control, capture and use of storm water as a supply resource and we encourage the State Board to actively engage water agencies as it continues to develop the Strategy and moves toward implementation. Reviewing the Storm Water Strategy objectives, Objective 1 (“Increase storm water capture and use through regulatory and non-regulatory approaches”), Objective 2 (“Increase stakeholder collaboration on a watershed scale”) and Objective 3 (“Establish permit pathways to assess storm water programs and meet water quality requirements”) are all areas where water agencies can provide valuable insights as the State Water Board seeks to develop and implement projects to enable and enhance multi-benefit approaches to storm water management.

The increased utilization of storm water as a water supply resource will require water agency expertise on a variety of regional and local-scale technical issues. Additionally, water agencies have an important perspective to offer on matters of statewide legal and policy significance, such as the potential water rights implications of implementation of the Strategy. To ensure that these critical issues are addressed in a timely and effective manner, we encourage the State Board to invite water agency representatives, including ACWA, to participate as members of the Storm Water Strategy Implementation Committee.

ACWA appreciates the substantial efforts of State Board staff to produce the Storm Water Strategy. ACWA and water agencies around the state stand ready to work with the State Board as it continues to refine and move toward implementation of the Storm Water Strategy. If you have any questions regarding this matter, please contact me at AdamR@ACWA.com or (916) 441-4545.

Sincerely,



Adam Walukiewicz Robin
Regulatory Advocate

cc: Ms. Annalisa Kihara, Senior Water Resources Control Engineer, Division of Water Quality
Ms. Noelle Patterson, Water Resources Control Engineer, Division of Water Quality