



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
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November 13, 2015

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



Dear Ms. Townsend:

Subject: STRATEGY TO OPTIMIZE RESOURCE MANAGEMENT OF STORM
WATER

Thank you for the opportunity to comment on the draft Strategy to Optimize Resource Management of Storm Water (Strategy). The Department of Defense (DoD) has a significant interest in supporting a comprehensive strategy that successfully incorporates a long term holistic approach of collaboration with the industrial, NGO and the regulatory communities as a whole. At a time of extreme drought and climate uncertainty, the role of storm water and the return of storm water to beneficial use should be a very high priority.

We are pleased to see the adoption of Goal 4 - Collaboration in order to Solve Water Quality and Pollutant Problems with an Array of Regulatory and Non-regulatory Approaches. Specifically, the recognition in Objective 6, that increasing source control and pollution prevention efforts are integral to a successful strategy. We believe this goal should go even further: it should provide the foundation for the strategy as a whole. We suggest your storm water strategy should focus on efforts ensuring that the water that is captured for beneficial reuse has had minimal contact with pollutants before it reaches the proverbial "end of pipe".

Just as California has been a world leader in redefining air pollution control strategies, California now has the opportunity to lead in storm water strategy. California's air program has operated holistically for many decades, recognizing that air quality improvements require long term interdisciplinary and inter-agency solutions, such as re-designing its transportation network. We support incorporation of projects such as 6b - Identify Opportunities for Source Control and Pollution Prevention, recognizing that success will require an even wider

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view, looking at the dispersal of pollutants through atmospheric deposition, and mobile sources such as transportation and land use planning.

I. Project 6(b) - Identify Opportunities for Source Control and Pollution Prevention - should be designated HIGH priority

While source control relating to pesticides is designated as a high priority, including identification of pesticide regulators such as the California Department of Pesticide Regulation (DPR) and US EPA Office of Pesticide Programs (OPP) by name, the broader project, namely 6(b), is designated a medium priority and intended only to "identify pollutants causing water quality degradation that are still being manufactured and in use, while considering the strength of the relationship between the pollutant and impacts to aquatic life or human health."

We would argue that identifying opportunities for source control should be designated a high priority and is the most effective way to have the greatest beneficial impact on water quality. Re-focusing storm water regulation from after the fact clean-up, which is costly and often times infeasible, to before the fact reduction at the source is not only more effective, but also fairly shifts the burden of responsibility to the source originator. 6(b) discusses developing cooperating agreements with authorities responsible for maintaining building code, plumbing code and pesticide use regulations, but does not go beyond to include air quality regulatory agencies or regional land use planning organizations. We believe project 6(b) should provide a more expansive view of source control.

II. 6(b)- Should identify greater cooperation with the California Air Resources Board (CARB)

As noted in our prior comments, we believe that the State Board, working closely with the California Air Resources Board (CARB) in support of their air quality programs, should undertake a more in-depth assessment of water quality cross-benefits from CARB regulatory efforts. These existing efforts may already effectively address direct impacts to storm water from known sources, and their effectiveness could increase through program reevaluation and adjustment. For example, an examination may show that continued electrification of California's transportation systems results in substantial water quality cross-benefits and should be accelerated. This will further air quality and climate goals as well.

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Much of the identification of sources has been done and is publicly available through California's Air Toxics Hot Spots Information and Assessment Act. For example, a conceptual model of Chollas Creek in San Diego indicates that 49% of the copper loading in storm water came from brake pads and 51% came from 8 known industrial sources¹. Working with CARB on already identified sources and clean transportation initiatives, as well as other agencies through the AB 32 and SB 375 process, would merit a separate, high priority project in itself.

III. 6(b) - Should identify Land Use Planning opportunities

Land use planning and the concept of "smart growth" is another area that is worthy of incorporation in the strategy. Given the relationship between water quality impacts and transportation, consideration should also be given to future land use patterns that minimize vehicle miles travelled (VMT) and "smart growth".

Navy Region Southwest is demonstrating this new direction. Regarding transportation, we are working with our Washington, D.C. leadership on a large electric vehicle (EV) procurement that we anticipate will see 500 EV's serving both the Navy and the US Marine Corps at our California installations. We also have worked to incorporate "smart growth" concepts in our ongoing planning for our major California installations. For example, several years ago Navy Region Southwest built Pacific Beacon, located on Naval Station San Diego, by converting a small golf course into a new home for 1900 sailors. The Pacific Beacon project allows sailors to live within walking distance of their ships and is located about two hundred yards from a light-rail station. Also, within easy walking distance are basic support services such as shopping, recreation, etc. It is part of DoD's commitment to implement "smart growth" concepts to reduce vehicle miles travelled, and the air, water and other pollutants associated with commuter traffic. Local land use planning, along with low-impact development (LID), should be an integral part of a comprehensive new future for storm water management.

We support the movement to beneficial re-use of storm water in California. We are encouraged by the inclusion of goals that

¹ This 2009 study is one of few that has looked at the relationship of aerial deposition and stormwater. The study, limited to the Chollas Creek watershed in San Diego, found aerial deposition resulted in 454 kg/yr of the storm water copper load. Of the industrial sources, the Navy's contribution was 8.5 kg/yr or about 2 percent of the total copper loading. Industrial sources were averaged between 2001 and 2006. This study further indicated that a pilot street sweeping program of 160 miles per month only removed 1.97 kg/yr (0.4%) of copper demonstrating the high value of source reduction versus efforts to clean up after deposition.

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manage storm water from a long-term watershed approach rather than strict numerical compliance requirements, as well as the implementation of more efficient and effective regulatory programs. This approach will better direct resources to create a coordinated response to this problem, which will result in significant pollution reduction, beneficial reuse of storm water, and cross-benefits through projects like cleaner transportation.

In order for the future of California storm water management to be effective, it must be a long-term holistic approach that considers source-control and land-use planning as cornerstones to the overall storm water strategy.

My point of contact for this is Randal Friedman who can be reached at (916)646-4112.

Sincerely,

A handwritten signature in black ink, appearing to read "C. L. Stathos". The signature is written in a cursive style with a large initial "C" and "L".

C. L. STATHOS
By direction