

**Division of Water Quality
Draft Storm Water Resource Plan Guidelines**

Deletions are shown in red strikethrough and additions are shown in blue underline.

On page 3, change the Table of Contents, item E. as follows:

E. Plan Implementation Strategy And Scheduling of Projects.....31

On page 4, change the Table of Contents, item E.2 as follows:

2. ~~Plan~~ Implementation.....32

On page 13, change the second paragraph of Section I as follows:

A Plan meeting the provisions of the Water Code need not be referred to as a “Storm Water Resource Plan.” ~~An E~~existing planning documents or a collection of existing documents and local ordinances may be utilized as a functionally equivalent Plan, including but not limited to: watershed management plans, OF integrated resource plans, urban water management plans, green infrastructure plans, 1F water quality improvement plans, salt and nutrient management plans, total maximum daily load (TMDL) implementation plans, or similar plans that include storm water and dry weather runoff capture and use as a component of the watershed goals and objectives.

On page 13, change footnote number 2 as follows:

²This may encompass Watershed Management Programs and Enhanced Watershed Management Programs as set forth in the LA County and City of Long Beach MS4 Permits (Order Nos. R4-~~21~~012-0175 and R4-2014-0024).

On page 13, change footnote number 3 as follows:

³This may encompass Green Infrastructure Planning and Implementation as set forth in the San Francisco Bay Area Municipal Regional Permit (Order R2-2015-~~0049XXXX~~, NPDES Permit No. CAS612008).

On page 15, first paragraph, change the first sentence as follows:

The Storm Water Management Planning Act implemented through Water Code section 10563 substantively focuses on diverting runoff from existing storm drains, channels, or conveyance structures to sites (particularly publicly owned sites) that can clean, store, infiltrate and/or use the runoff.

On page 16, change the bulleted list in Section V, subsection B as follows:

B. CONSISTENCY WITH WATER QUALITY CONTROL PLANS, APPLICABLE WATER QUALITY CONTROL POLICIES, AND WATER RIGHTS

The Storm Water Resource Plan must be consistent with, and assist in compliance with, applicable federal and state regulations and policies, and permits implementing federal and state regulations and policies, including, but not limited to:

- Clean Water Act and the Safe Drinking Water Act;
- Water rights permits/licenses;
- State Water Board plans and policies; **and**
- State and Regional Water Board water quality control plans and policies, including total maximum daily loads adopted by the Regional Water Board. (Wat. Code, § 10562, subd. (b)(5).); **and**
- **Any other federal and/or state laws, regulations and permits.**

On page 17, change Section V, subsection F as follows:

F. MODIFICATION OF A RIVER OR STREAM CHANNEL

Projects within the Plan that include substantial change or use of any material from a river, stream, or lake should avoid and minimize erosion, sediment transport, and hydromodification, and fully mitigate environmental impacts resulting from the project, as required by Clean Water Act sections 401 and 404 **and any other federal and state laws, regulations and permits.**

On page 19, change Section VI, subsection A, item 5 as follows:

5. Plans based on **the IRWM group** **regional and sub-regional** watershed boundaries are preferred.

On page 19, change Section VI, subsection A, item v as follows:

- v. A description of the local entity or entities that provide potable **and non-potable** water supplies, and the estimated volume of potable **and non-potable** water provided by the water suppliers;

On page 20, change Section VI, subsection B, third paragraph as follows:

Nongovernmental organizations and state conservancies can provide: **(1)** essential leadership, innovation, and expertise in planning, **and conducting** project design **and implementation**; **(2)** assistance in developing effective collaborative approaches and engaging communities; and **(3)** in-kind support and private funding. The State Water Board encourages these collaborative efforts to build strong working partnerships between public agencies, nongovernmental organizations, and the communities served.

On page 20, change Section VI, subsection B, item ii as follows:

- ii. Identification of and coordination with agencies and organizations (including, but not limited to public agencies, nonprofit organizations, and privately owned water utilities) that need to participate and **implement** exercise their own authorities and mandates in order to address the storm water and dry weather runoff management objectives of the Plan for the targeted watershed;

On page 21, change subsection C.1, first paragraph, as follows:

1. Identification of Projects Using Quantitative Measures

To be consistent with Water Code requirements, Plans shall include a metrics-based and integrated evaluation and analysis of multiple benefits to maximize water supply, water quality, flood management, environmental, and other community benefits within the watershed. (Wat. Code, § 10562, subd.(b)(2).) **Table 3** below lists and defines examples of appropriate metrics for each benefit type. Benefits from projects within Plans may be tangible (measurable and quantifiable) or intangible (non-measurable). For more information on how to describe intangible benefits, see section VI.C.2.d below. Other metrics and methodologies for integrated evaluation and analysis of multiple benefits may be considered, as appropriate.

On page 23, change subsection C.2, first paragraph as follows:

The Storm Water Resource Plan should include an integrated watershed-based and metrics-based analysis demonstrating that the proposed storm water and dry weather runoff capture projects and programs within the watershed will collectively address the Plan's storm water management objectives and produce the proposed multiple benefits identified per the guidance in Section VI.D.

On page 24, change subsection C.2.a, second paragraph as follows:

In addition to the above, to the extent possible and as relevant, the narrative should describe in a quantitative manner using the metrics in **Table 3** (or other more appropriate metrics) how the project and programs in the watershed will contribute to the preservation, restoration, or enhancement of the following watershed processes, as applicable:

On page 25, change subsection C.2.b, first paragraph as follows:

Projects included in the Plan may be individual projects or "project types," that will result in the Plan's proposed watershed outcomes, as demonstrated through a quantitative metrics-s-based analysis in the Plan (**Figure 1**).

On page 27, change subsection C.2.d, first paragraph as follows:

As applicable, the narrative analysis should describe in a quantitative manner using the metrics in **Table 3 (or other appropriate metrics)** and narratively for intangible benefits how proposed projects and programs within the watershed will collectively contribute to the following elements:

On page 29, change subsection D.1, item b as follows:

- b. Projects or programs that use a metrics-driven approach and an appropriately detailed geospatial analysis of multiple benefits to maximize water supply, water quality, flood management, environmental, and community benefits within the watershed.

On page 31, change subsection E title and items a and b, as follows:

E. PLAN IMPLEMENTATION STRATEGY AND SCHEDULING OF PROJECTS

1. Resources for Plan Implementation

A Storm Water Resource Plan should identify the resources that the participating entities are committing for implementation of the Plan. The Plan should include the following items to ensure its effective implementation. (Wat. Code, § 10562, subd. (d)(8).):

- a. Projection of additional funding needs and sources for administration and project implementation needs, above and beyond the needs of the existing storm water management plans and/or integrated regional water management plans; and
- b. Schedule for arranging and securing Plan **implementation** financing for project implementation, including identification of phased Plan and/or project implementation.

On page 32, change subsection E.2 title as follows:

2. ~~Plan~~ Implementation

On page 33, change subsection E.3, bulleted list as follows:

Furthermore, as Plan programs or projects are implemented and information is gathered over time, the Plan should be modified to reflect the most current understanding of the watershed and present a sound approach to addressing changing conditions. Ongoing adaptations to the Plan may include:

- a. Re-characterization of water quality priorities;
- b. A source assessment re-evaluation;
- c. An effectiveness assessment of watershed-based projects; ~~and/or~~
- d. An updated metrics-based, quantitative analysis;
- e. Deleted or new projects; and/or
- f. Identification of completed projects.

On page 34, change subsection F as follows:

The Plan should include or provide for public education and public participation goals addressing the following elements:

- i. Public education and public participation opportunities to engage the public when considering major technical and policy issues related to the development and implementation of the Plan;
- ii. Mechanisms, processes, and milestones that have been or will be used to facilitate public participation and communication during development and implementation of the Plan;
- iii. Mechanisms to engage members of affected communities in project design and implementation;
- iv. Identification and inclusion of specific audiences including local ratepayers, developers, locally regulated commercial and industrial stakeholders, nongovernmental organizations, nonprofit organizations, and the general public;
- v. Strategies to engage disadvantaged and climate vulnerable communities within the Plan boundaries and ongoing facilitation and tracking of their involvement in the planning process;
- vi. Efforts to identify and address specific, runoff-related environmental injustice issues within the watershed; and
- vii. A schedule for initial public engagement and education.

Response to Comments

For General Comments numbered 1, 3, 4, 5, 6, 7 and 8, add County of Orange Public Works (OCPW) to the list of commenters. Additionally, add OCPW-4, OCPW-10, OCPW-8, OCPW-9, OCPW-1, and OCPW-8 to the “Cataloged comment numbers” sectioned for the comments identified above, respectively.