

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

July 24, 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 Storm Water Strategic Initiative Proposal to Develop a Storm Water Program Workplan and Implementation Strategy

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") Proposal to Develop a Storm Water Program Workplan and Implementation Strategy ("Storm Water Proposal," or "Proposal"). 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 and improve reliability for water users and the environment. ACWA supports the development of programs and policies that can improve regional water supply reliability, including storm water capture.

ACWA supports the Storm Water Proposal's emphasis on treating storm water as a valuable water resource and encourages the State Board to more actively engage water agencies as it continues the development of the Proposal. Many water agencies have decades of experience in the effective control, capture and use of storm water as a resource. The increased utilization of storm water as a water supply resource will require water agency input on matters with statewide legal and policy implications, as well as water agency expertise on regional and local-scale technical issues. To ensure that these critical issues are addressed in a timely and effective manner, we encourage the State Board to increase its outreach to water agency stakeholders moving forward.

ACWA appreciates the substantial efforts of State Board staff to produce the Storm Water Proposal. 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 Proposal. If you have any questions regarding this matter, please contact me at AdamW@ACWA.com or (916) 441-4545.

Sincerely,

Adam Walukiewicz

Regulatory Advocate

Dan Waldreum

cc: Mr. Greg Gearheart, Deputy Director, Office of Information Management and Analysis

Mr. Chris Beegan, Engineering Geologist, Division of Water Quality

Ms. Sarah Gatzke, Water Resource Control Engineer, Division of Water Quality

Ms. Shuka Rastegarpour, Environmental Scientist, Division of Water Quality