

**CALIFORNIA COASTAL COMMISSION**

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September 30, 2004

Ms. Tracie Billington  
Department of Water Resources  
Divisions of Planning and Local Assistance  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Ms. Billington:

Thank you for the opportunity to comment on the Integrated Regional Water Management Grant Program. This is an important program that will make a significant difference in water quality and water supply protection for California.

The California Coastal Commission staff is particularly interested in the application of Proposition 50, Chapter 8 funds for the protection or restoration of impaired coastal waters or areas of special biological significance as defined in the California Ocean Plan. As co-lead agency for implementing the California Nonpoint Source Program Plan, we have been working on several initiatives to protect California's coastal waters from the impacts of polluted runoff. One of the requirements of California's federally approved nonpoint source plan is to identify areas of the coastline where development impacts or threatens to impact coastal water quality and to focus efforts to implement the nonpoint source plan in these so-called Critical Coastal Areas. Working with fifteen partner agencies, we have identified 101 Critical Coastal Areas, each of which are impacting or threatening an impaired water body, an area of special biological significance, or both. In fact, the list of Critical Coastal Areas includes all of the 34 areas of special biological significance identified in the California Ocean Plan.

We believe that Proposition 50, Chapter 8 funds should support the development of planning efforts in one or more areas of special biological significance and/or efforts in impaired coastal waters so that the Critical Coastal Areas initiative can be implemented as described in the California Nonpoint Source Program Plan. In discussions with the SWRCB Division of Financial Assistance staff and through reviewing the IRWMP guidelines, it appears that the intent is to support planning efforts for one or more ASBSs through the Planning Grants as applied to development of Integrated Coastal Watershed Management Plans. Unfortunately, application of the guidelines, as currently written, does not appear to consider the scale of the coastal watersheds that affect most of the state-designated areas of special biological significance.

For example, many of the watersheds adjacent to ASBSs only constitute a small portion of the local government jurisdiction (e.g., Carmel Bay or San Diego Marine Life Refuge). Others may constitute large areas of ocean that are adjacent to remote portions of the coast. In either case, there will be few opportunities for coordination of water quality and water supply efforts. And there is only a small likelihood that a local sponsor will be able to contribute the proposed 50%

matching funds for a grant on the order of \$100,000 to \$500,000. In fact, it appears unlikely that any potential applicants would be able to propose a planning effort for an ASBS that would meet the guidelines as currently written. We recommend that the guidelines be modified as shown in the attached file to allow for one or more competitive proposals that will benefit ASBSs.

Thank you for consideration in this matter. If you have questions about these comments, please contact Jack Gregg, our Water Quality Supervisor at (415) 904-5246 or [jgregg@coastal.ca.gov](mailto:jgregg@coastal.ca.gov).

Sincerely,

Alfred Wanger  
Deputy Director  
Energy, Ocean Resources and Water Quality

cc: James Marshall, State Water Resources Control Board