

April 23, 2010

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State of California  
Department of Water Resources  
Division of Integrated Regional Water Management  
Attn: Joe Yun  
P.O. Box 942836  
Sacramento, CA 94236-0001

Subject: Stormwater Flood Control Grant Program – Proposal Solicitation Package Draft  
Comments from City of Sacramento

Dear Mr. Yun:

We appreciate the opportunity to comment on the proposed application process for Proposition 1E funds. The competitive application requirements are comprehensive and are understandably needed to provide a competitive framework to gauge the relative merit of the variety of project applications for the \$300 million available from this legislation. While this system is valid to grade competing stormwater projects and allocate the limited funding, we think a non-competitive framework is more appropriate for the portion of these funds that are identified in the legislation for combined municipal sewer and storm water (CSS) system improvements.

A portion of the legislative language states the following: “Twenty million dollars (\$20,000,000) shall be available for local agencies to meet immediate water quality needs related to combined municipal sewer and stormwater systems to prevent sewage discharges into state waters. Twenty million dollars (\$20,000,000) shall be available for urban stream stormwater flood management projects to reduce the frequency and impacts of flooding in watersheds that drain to the San Francisco Bay”. This provision is unique in this bill since, unlike storm water systems of which there are hundreds if not thousands in the State, there are only a small number of systems that meet the criteria for this \$20 million appropriation.

Given the limited number of eligible applicants, we believe that the draft application should be streamlined. To streamline this process we would propose to work directly with the Department of Water Resources and the limited number of agencies with combined systems to develop an appropriate distribution of funding as well as determine the required submittals to ensure the merits and feasibility of our projects meet the intent of the bond funding legislation. Consistent with the provisions of the bill, we recommend, the application require the following key features: 1) Inclusion of proposed CSS projects in an integrated regional water management plan; 2) verification of a 50% minimum local match; 3) justification of proposed projects to show that they meet the goals stated in the language of the bill, now Section 5096.827 of the Public Resources Code, which authorizes the funds for the express purpose “to meet immediate water quality needs related to combined municipal sewer and storm water systems to prevent sewage discharges into state waters.”

Thank you for this opportunity to comment on the application process. Please feel free to contact me directly at (916) 808-1448, if I can provide any additional information.

Sincerely,

Richard Batha, PE  
Supervising Engineer

Cc: Dave Brent