STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OF September 6, 2012
Prepared on August 14, 2012

ITEM NUMBER: **8**

SUBJECT: **Resolution No. R3-2012-0025**

STAFF CONTACT: **Dominic Roques 805/542-4780 or droques@waterboards.ca.gov**

KEY INFORMATION

Location:	Multiple Municipalities throughout the Central Coast Region
Type of Discharge:	Municipal stormwater
Disposal Method:	Discharge to surface and groundwater
Existing Orders:	NPDES General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems, Order No. 2003-0005-DWQ

This Action: **Approve Resolution No. R3-2012-0025**

I. SUMMARY

Staff recommends adoption of the attached Resolution to establish Post-Construction Stormwater Management Requirements for Development Projects for municipalities throughout the Central Coast Region. In response to significant public comment and feedback from stakeholders, and in acknowledgement of the economic conditions faced by municipalities in the Region, Staff has modified its previous (May 15, 2012) version of the proposed requirements. Many municipalities confront strained fiscal circumstance and the demise of their Redevelopment Agencies while facing other State requirements to provide housing and implement climate action plans. The revised Post-Construction Requirements constitute the minimum requirements needed to protect water quality from stormwater impacts caused by development, while giving special accommodation to infill and redevelopment projects that are a priority for municipalities across the Central Coast striving to stimulate economic recovery. The Post-Construction Requirements incorporate both flexibility and environmental accountability, and as such are a reasonable initial effort within the Central Coast Region to address the adverse impacts associated with new and redevelopment.

The primary objective of these Post-Construction Requirements is to ensure that the Permittee is reducing pollutant discharges to the Maximum Extent Practicable and preventing stormwater discharges from causing or contributing to a violation of receiving water quality standards in all applicable development projects that require approvals and/or permits issued under the Permittee's planning, building, or other comparable authority. The Post-Construction Requirements emphasize protecting and, where degraded, restoring key watershed processes to create and sustain linkages between hydrology, channel geomorphology, and biological health necessary for healthy watersheds. Maintenance and restoration of watershed processes impacted by stormwater management is necessary to protect water quality and beneficial uses.

These Post-Construction Requirements express how the municipalities comply with the Low Impact Development (LID) and flow control requirements already established in their Stormwater Management Plans (SWMPs). In other words, the requirements provide the LID and flow control criteria development, adoption, and implementation commitments already required in the municipalities' SWMPs.

The Post-Construction Requirements retain the essential elements of a strategy that Staff developed with substantial stakeholder involvement over the past four years. This strategy avoids a "one-size-fits-all" approach in response to a clear message from municipalities from the earliest discussions about developing post-construction requirements. The strategy emphasizes protection of areas that are less disturbed over urban areas with existing impacts, and applies requirements more rigorously to new development as compared with redevelopment in existing urban areas. It is designed to address the full suite of watershed processes affected by urban stormwater, including surface runoff, groundwater recharge, and the chemical and biological role of soil and vegetation in filtering runoff. The strategy is grounded in science so is well suited to address the full range of stresses on beneficial uses where stormwater plays a role, and points clearly to a need for managing runoff volume on development projects in most parts of the Central Coast. The volume-based approach to stormwater management is strongly endorsed by the nation's leading science and policy experts and is being embraced by engineering practitioners as well.

The Resolution provides a solid foundation from which to begin implementation of post-construction stormwater requirements required by the Clean Water Act. With a focus on the goal of runoff volume control, the Post-Construction Requirements identify Low Impact Development (LID) as an essential tool for post-construction stormwater management and require its use where feasible. LID is expected to be a viable strategy to reduce runoff volumes in the majority of

projects in the Central Coast. However, the Post-Construction Requirements allow municipalities to adjust the application of the requirements where LID is technically infeasible.

The Central Coast Water Board has a demonstrated commitment to implementing LID throughout the Region. Since the Central Coast Water Board created the LID Fund in 2008, it has spent more than $2 million providing technical support to advance the implementation of this superior approach to managing stormwater. Now, four years since the Central Coast Water Board's initial commitment, this Resolution stands as the regulatory compliment to the substantial investments that laid the groundwork for successful implementation of LID. The Post-Construction Requirements satisfy the critical need for numeric performance requirements to ensure effective implementation of LID.

II. BACKGROUND

A. NPDES Permit Context for Post-Construction Requirements

Most Central Coast municipalities are regulated under the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for the Discharge of Storm Water from Small Municipal Separate Storm Sewer Systems (MS4s), Order No. 2003-0005-DWQ (Phase II Municipal General Permit). The municipalities obtained coverage under the Phase II Municipal General Permit when the Central Coast Water Board or its Executive Officer approved their Storm Water Management Plans (SWMPs). The Central Coast Water Board Executive Officer requires specific conditions for MS4s' SWMPs pursuant to the federal Clean Water Act, the Basin Plan, and the Phase II Municipal General Permit.

The Phase II Municipal General Permit requires regulated small MS4s to address stormwater runoff from development and redevelopment projects through post-construction stormwater management requirements. The Phase II Municipal General Permit requires the Permittee to incorporate changes required by or acceptable to the Central Coast Water Board Executive Officer into the Permittee's SWMP and to adhere to it during implementation.

B. The Joint Effort to Develop Post-Construction Requirements

On August 4, 2009 the Central Coast Water Board Executive Officer notified municipalities of the option to participate in the Central Coast Joint Effort for developing post-construction stormwater criteria as a means to meet the hydromodification control criteria development, adoption, and implementation commitments already established in the municipalities' SWMPs. Phase II municipalities agreeing to participate in the Joint Effort submitted a written declaration of their intent to meet the terms of participation. The Phase I City of Salinas also committed to participation in the Joint Effort, as did two University of California campuses.

Prior to the Joint Effort, information on the local characteristics of Central Coast watersheds was inadequate for municipalities to develop Post-Construction Requirements that protect watershed processes from stormwater management impacts so that beneficial uses of receiving waters are maintained and, where applicable, restored. In an effort to financially assist the municipalities, the Central Coast Water Board secured funds from the State Water Resources Control Board's Cleanup and Abatement Account to support development of hydromodification control criteria and related Post-Construction Requirements. These funds were used to establish an expert team of scientists to characterize the Central Coast region's watersheds and help create a methodology for developing Post-Construction Requirements based on that characterization. The Post-Construction Requirements included in Resolution No. R3-2012-0025 (see Attachment 1 of the Resolution) are based on that methodology, which has been summarized in the Technical Support

Document for Post-Construction Stormwater Management Requirements (see Attachment 2 of the Resolution) and is provided in its entirety as an attachment to that document. The Technical Support Document provides the rationale and explanation for the Post-Construction Requirements.

C. Stakeholder Involvement

By soliciting stakeholder input early on, Staff ensured that the Joint Effort offered a science-based response to stakeholders' concerns that post-construction requirements not reflect a "one-size-fits-all" approach, and that technical feasibility be determined by site conditions. Staff also understood at the outset that municipalities needed support and technical guidance in preparing for implementation of post-construction requirements. Staff provided that support over the past two years, including: guidance on municipal code updates to remove obstacles and facilitate LID; technical support and guidance on LID designs for parking lots and bioretention facilities; and working with Permittees to identify appropriate interim requirements for LID implementation.

The Post-Construction Requirements are a product of Staff's continued engagement with stakeholders through both structured and less formal opportunities for involvement. The history of stakeholder involvement was chronicled in Staff's status report for the March 15, 2012 Central Coast Water Board meeting and the relevant section from that report is included as Attachment 6 to this staff report. Staff's efforts included: convening a technical review committee to review all deliverables from the technical consultants; conducting multiple stakeholder workshops early on, at the mid-point, and at the conclusion; posting project materials on a dedicated Joint Effort webpage; including Joint Effort items on multiple Central Coast Water Board meeting agendas; providing stakeholders with a mid-term status report; speaking at municipal stormwater manager groups throughout the region; and convening meet-and-confer meetings with key environmental and building industry stakeholders. Staff also remained actively engaged in stakeholder workshops for the post-construction requirements being considered for the update to the State Board's Phase II General Municipal Permit to ensure greater compatibility between regional and State requirements.

Staff believes this significant effort to engage stakeholders from very early discussions on how to develop post-construction requirements for the Central Coast, up to the current recommendation to approve the Resolution, has yielded the most reasonable, feasible and understandable starting point for implementation. This effort also resulted in great benefit to Central Coast municipalities by financing development of these requirements. This stands in contrast to how post-construction requirements have been developed for municipalities in other regions where Permittees have had to finance costly studies to develop numeric criteria.

The Joint Effort was designed to be completed over a two-year period. However, since the Central Coast Water Board Executive Officer's 2009 notification to municipalities of the option to participate in the Joint Effort, the project's timeline has been extended multiple times. The extensions have benefitted and responded to the stakeholder process but also delayed implementation of Post-Construction Requirements for new and redevelopment, thereby preventing implementation of necessary water quality protection improvements. At its March 15, 2012 Board Meeting, the Central Coast Water Board responded to requests from municipalities for more time to review the proposed requirements and granted an extension to the schedule for bringing this item to the Central Coast Water Board for approval from July 12, 2012 to September 6, 2012.

III. POST-CONSTRUCTION REQUIREMENTS OVERVIEW

A. Performance Requirements

The Post-Construction Requirements (Post-Construction Stormwater Management Requirements for Development Projects in the Central Coast Region, Attachment 1 of the Resolution) establish specific Performance Requirements and related implementation measures that municipalities will use to implement post-construction stormwater management actions at development and redevelopment projects. Through the Joint Effort, the urbanized portions of the Central Coast Region were categorized into 10 Watershed Management Zones, based on common key watershed processes and receiving water type (creek, ocean, lake, etc.). The Post-Construction Requirements require municipalities to determine the Watershed Management Zone in which development projects are proposed. Performance Requirements are then specified for the project based on the Watershed Management Zone. The Performance Requirements for each Watershed Management Zone are designed to protect those watershed processes within the Watershed Management Zone that are critical for beneficial uses.

The Performance Requirements rely on four important strategies that are critical to recognize for a full understanding of how the requirements, taken together, will result in protection of watershed processes and the beneficial uses they support: 1) a reliance on LID to the extent feasible to achieve protection of the broadest suite of watershed processes; 2) the use of Stormwater Control Plans to ensure project applicants have followed due diligence in selecting Stormwater Control Measures and have optimized LID; 3) the combination of runoff volume retention and peak management requirements on larger sites to achieve a broad range of watershed process protection while also protecting stream channels from erosion; and 4) the additive application of Performance Requirements for projects that trigger each successive size threshold (e.g., the largest sites must also meet Performance Requirements applying to smaller sites). Elements of these strategies are all integrated into the Performance Requirements to support successful implementation.

Performance Requirement No. 1: Site Design and Runoff Reduction

This requirement applies to projects that create and/or replace $\geq$ 2,500 ft^2 of impervious surface and requires projects to utilize site design and runoff reduction measures, where feasible. The site design measures are the first and best opportunity to invoke management strategies for preserving the natural conditions of a site and maintaining soil and vegetation. For example, minimizing impervious surfaces and minimizing compaction of native soils during site design preserves portions of the site in a condition to support watershed processes by retaining the soils' capacity to infiltrate water, thereby reducing runoff that requires treatment and flow control. Performance Requirement No.1 invokes the LID design concept of mimicking predevelopment hydrology to the extent feasible. The site design measures themselves are straightforward (e.g., "minimize compaction of native soils," "minimize impervious surface…"). Projects must also select one measure from a brief list of runoff reduction measures, such as: direct roof runoff into cisterns or rain barrels for use; direct runoff from sidewalks, walkways, and/or patios onto vegetated areas. Similar requirements are already in place in several municipalities in the Region.

Performance Requirement No. 2: Water Quality Treatment

The Water Quality Treatment Performance Requirement applies to Regulated Projects that create and/or replace $\geq$ 5,000 ft^2 of Net Impervious Area, and to detached single-family residences that create and/or replace $\geq$ 15,000 ft^2 of Net Impervious Area. Performance Requirement No. 2 applies to all projects in all Watershed Management Zones.

The Water Quality Treatment Performance Requirement addresses post-construction pollutant loading through treatment measures that emphasize LID (harvest and use, infiltration, and evapotranspiration) over conventional non-retention based treatment approaches (e.g. inlet filters, drain inserts). However, in these Post-Construction Requirements, non-retention, or, flow-through treatment for smaller projects up to 15,000 ft^2 is allowed to provide these smaller projects with technically feasible approaches where necessary.

Water quality treatment is required for larger (population >50,000) and fast growing Phase II communities per the 2003 Phase II Municipal Permit. The Post-Construction Requirements extend the water quality treatment requirements to the remaining traditional municipalities (as does the new Draft Phase II Municipal Permit) and use the same criteria that have been used throughout California, based on treating runoff from the 85th percentile storm event or an equivalent rainfall intensity. In most Phase I municipalities, these requirements apply to smaller projects from 5,000 to 10,000 ft^2. And some Phase I permits stipulate that LID must be used to meet the requirement.

Performance Requirement No. 3: Runoff Retention

All Regulated Projects that create and/or replace ≥15,000 ft^2 of impervious surface in all Watershed Management Zones except Watershed Management Zone 3, which is underlain by generally impervious rocks, must retain stormwater runoff to protect watershed processes impacted by stormwater management so that beneficial uses of receiving waters are maintained and, where applicable, restored. Where technically feasible, the goal of the retention requirement is that 100% of the volume of water from storms less than or equal to the indicated percentile rainfall event (85th or 95th), will not discharge to surface waters. This Performance Requirement indicates compliance can be achieved through infiltration in some Watershed Management Zones, and through non-infiltrative (storage, use, etc.) methods in others. The goal of retaining 100% of runoff from all rain events equal to or less than the 95th percentile rain event was selected because "it employs natural treatment and flow attenuation methods that are presumed to have existed on the site before construction of infrastructure (e.g., building, roads, parking lots, driveways,) and is intended to infiltrate or evapotranspirate the full volume of the 95th percentile storm."[1]

In response to concerns about the technical feasibility of this Performance Requirement, Staff revised the May 14, 2012 Post-Construction Requirements to provide an event-based hydraulic analysis and sizing approach that allows for less than 100% runoff retention. The event-based hydraulic analysis and sizing approach optimizes retention, but the runoff volume that does not infiltrate or remain on-site through storage, use, or evapotranspiration, may be treated and released through an underdrain. Thus, no site is being required to infiltrate beyond its natural capacity to infiltrate.

Staff also revised the May 14, 2012 Post-Construction Requirements to integrate a suggestion from Permittees to specify a limit on the portion of a project site that must be dedicated to retention-based Stormwater Control Measures. The limit, 10% of the site's equivalent impervious surface area, further addresses the feasibility of retention on sites with limited space.

The combined effect of these two revisions, along with multiple adjustments to the requirements for replaced impervious surface, resolves most, if not all, foreseeable issues of technical feasibility. See Sections D, IV and V below for more discussion about these revisions.

[1] USEPA, 2010. http://www.epa.gov/owow/NPS/lid/section438/pdf/final_sec438_eisa.pdf pp. 12, 13.

Performance Requirement No. 4: Peak Management

The Peak Management Performance Requirement is applied to projects that create and/or replace ≥22,500 ft^2 of impervious surface. It states that post-development peak flows shall not exceed pre-project peak flows for the 2- through 10-year runoff events. Peak management is required only in Watershed Management Zones where receiving waters (streams) are potentially impacted by alterations to runoff duration, rate, and volume. The May 14, 2012 Draft Post-Construction Requirements included runoff events up to the 100-year event. Central Coast Water Board staff lowered the required range of events to be managed because staff concurred with Permittees that events beyond the 10-year event are addressed by flood control requirements in most jurisdictions. Lowering the required range of events to be managed also brings the Peak Management Performance Requirement into closer alignment with many Phase I permits in the State, which are focused on controlling flow from smaller, longer duration runoff events.

B. LID Development Standards

Post-Construction Requirements require all applicable Regulated Projects, where technically feasible, to meet the Runoff Retention Performance Requirements using LID Development Standards, which include: site assessment measures; site design measures; site runoff reduction measures; and structural Stormwater Control Measures that optimize protection and restoration of watershed processes, such as bioretention and other small-scale, decentralized, LID measures. The goal of LID is to mimic the pre-development natural hydrologic condition of the site. This means that the stormwater does what it would have done before development; such as infiltrate into the ground and evapotranspire into the air. Additional community and environmental benefits may also be achieved with the use of LID. The Post-Construction Requirements emphasize utilization of LID principles, because LID is an effective approach to managing stormwater to minimize the adverse effects of urbanization and development on watershed processes and beneficial uses resulting from changes in stormwater runoff conditions. LID strategies can achieve significant reductions in pollutant loading and runoff volume as well as greatly enhanced recharge rates.

C. Stormwater Control Plan

Stormwater Control Plans are an important vehicle by which the Permittee and project applicant communicate the critical elements of the project's stormwater management strategy. Project applicants must demonstrate through submittal of the Stormwater Control Plan that each of LID standard elements has been achieved to the extent feasible before selecting more conventional structural Stormwater Control Measures. Where LID Stormwater Control Measures are not feasible, the Permittee may allow Regulated Projects to use the conventional designs (wet ponds, dry wells, infiltration basins) to meet the Runoff Retention Performance Requirement.

D. Adjustments for Infill/Redevelopment and Technical Infeasibility

The Performance Requirements are applied consistently based on the specified size thresholds; however, several adjustments are built into the Post-Construction Requirements to address circumstances that act as obstacles to full implementation across the entire development site. Most adjustments focus on how the Runoff Retention Performance Requirement is applied and are intended to address the technical challenges of meeting retention requirements in redevelopment contexts, while also acknowledging the presumed water quality benefit of infill and redevelopment relative to new development.

Specifically, the Post-Construction Requirements limit how the Runoff Retention Performance Requirement applies to redevelopment and infill projects. The adjustment is applied in determining the total amount of impervious surface that must meet the Performance Requirement and results in less of the impervious surface being subject to the retention requirement on a redevelopment project than on a new development project. In all Regulated Projects, one-half (50%) of *replaced* impervious surface is subject to the Retention Requirements, while the entire area (100%) of *new* impervious surface remains subject to the Retention Requirements. Additional relief is provided if the project is within an Urban Sustainability Area. In that instance, all *new* impervious surface is subject to the Retention Requirements, but *replaced* impervious surface is held only to pre-project conditions of runoff volume retention.

Staff also revised the May 14, 2012 Draft Post-Construction Requirements to include an additional adjustment for how the Runoff Retention Performance Requirement applies. The revision specifies a limit on the portion of a project site that must be dedicated to retention-based Stormwater Control Measures. This provision is expected to primarily benefit infill/redevelopment projects with space constraints because few of these projects will be required to seek off-site mitigation to achieve the Performance Requirement.

Additional adjustments to the Performance Requirements are provided for Special Circumstances. The Special Circumstances designations adjust the Runoff Retention and/or Peak Management Performance Requirements where those Performance Requirements would be ineffective or inappropriate at maintaining or restoring beneficial uses of receiving waters. Special Circumstance may be applied to projects that drain to: Historic Lakes and Wetlands, Highly Altered Channels, and Intermediate Flow Control Facilities (regional facilities).

See Section V, below and Attachment 1 for more detail on revisions.

E. Off-site Mitigation

Staff revised the May 14, 2012 Post-Construction Requirements to include a limit on the portion of a project site that must be dedicated to retention-based Stormwater Control Measures. This is responsive to comments that the requirements must accommodate potential cases where off-site mitigation will be necessary. The revisions will result in relatively few circumstances where off-site mitigation may be required. For those cases, the Post-Construction Requirements identify various scenarios for municipalities to provide Alternative Compliance. See Section V, below and Attachment 1 for more detail on revisions.

IV. PUBLIC COMMENT

On May 14, 2012, Staff made available for public review the Draft Resolution No. R3-2012-0025. Staff also conducted Public Workshops on the May 14, 2012 Draft Resolution on June 5 and 6, 2012 in Santa Maria and Watsonville, respectively. Based on comments received from the public, Staff revised the Post-Construction Requirements (Section V, below).

This Staff Report includes three attachments relating to Public Comments, including the written comments themselves (Attachment 3), Staff Response to Comment (Attachment 4), and a Summary of Key Issues Raised in Public Comment (Attachment 5).

A. Key Issues Raised by Public

Several key issues emerged from among the more than 300 comments Staff received from the 53-day Public Comment period for the May 14, 2012 Draft Resolution. These key issues include:

1. Technical Feasibility of the Runoff Retention Performance Requirement
2. Challenges to Implement Alternative Compliance
3. The Need to Promote Infill
4. Cost
5. Consistency with other Permits (Phase I and Draft Phase II General Permit)
6. Regulatory Takings
7. Requirements for Replaced Impervious Surfaces
8. Deadline for Applying Post-Construction Requirements and Related Issue Concerning Regulated Projects Approved by Ministerial Permit

Key Issues Raised by the Public on Draft Resolution No. R3-2012-0025 and Staff Response (Attachment 5) provides: a summary of the comments that raise each key issue; a comprehensive staff response to each key issue raised; and a description of revisions staff made to the May 14, 2012 Draft Resolution to address the issue.

B. Opportunity to Comment on September 6, 2012 Resolution

The Central Coast Water Board will provide an opportunity for oral comments on the September 6, 2012 Resolution at the hearing scheduled for September 6, 2012.

V. CHANGES TO MAY 14 DRAFT RESOLUTION NO. R3-2012-0025

Staff's Response to Comments (Attachment 4), and Key Issues document (Attachment 5) include a discussion of changes staff made as a result of Public Comments received on the May 14, 2012 Draft Resolution, including many minor revisions for clarification suggested in the comments. The following list summarizes the more significant changes:

1. Specify minimum of 10% of project's equivalent impervious area to be dedicated to retention-based Stormwater Control Measures. If a site meets the 10% threshold, no further on-site or off-site retention is required where it is technically infeasible to do so.
2. Provide event-based hydraulic analysis and sizing approach to allow less than full retention of design volumes per Performance Requirement No. 3: Runoff Retention.
3. Change Performance Requirement No. 4: Peak Management to specify management of runoff events from 2- to 10-yr instead of 2-yr to 100-yr.
4. Revise adjustments for application of Performance Requirement No. 3: Runoff Retention in Urban Sustainability Areas to allow existing levels of volume mitigation for 100% of replaced impervious surfaces, rather than 50%.
5. Eliminate need for off-site projects to be identified for Urban Sustainability Areas to be approved.
6. Remove requirements specifying continuous simulation hydrologic calculations for projects $\geq$22,500 ft^2.
7. Modify calculation for Net Impervious Area to further incentivize reductions in imperviousness.
8. Provide greater flexibility in locating and financing offsite mitigation projects.

9. Clarify exemptions language.
10. Expand Special Circumstances to include San Lorenzo River through City of Santa Cruz.
11. Make reporting requirements for municipalities more reasonable.
12. Relax Site Design and Stormwater Treatment Requirements to require Regulated Projects to implement only one design measure.

Revisions to the May 14, 2012 Draft Resolution are marked in underline and strikeout format in Attachment 1. This version also includes several minor, non-substantive revisions Staff made for clarity, which are not highlighted to aid legibility. A 'track changes accepted,' Post-Construction Requirements is provided in Attachment 2.

VI. RECOMMENDATION

Resolution No. R3-2012-0025 will establish post-construction stormwater management requirements for development on the Central Coast. The Resolution contains the minimum requirements necessary to reduce pollutants in stormwater discharges to the Maximum Extent Practicable and to protect water quality and beneficial uses, including the achievement of water quality standards. The Resolution addresses the specific contribution to water quality problems caused by development by establishing provisions designed to reduce pollutants, achieve water quality standards, and protect and restore watershed processes impacted by stormwater management.

Staff presents the September 6, 2012 Resolution as an appropriate starting point for managing post-construction stormwater for new and redevelopment projects in the Central Coast.

Staff recommends that the Central Coast Water Board adopt Resolution No. R3-2012-0025.

VII. ATTACHMENTS

1. Resolution No. R3-2012-0025 (track changes version of May14, 2012 Draft)
    a. Resolution Attachment 1: Post-Construction Requirements (track changes version of May14, 2012 Draft)
    b. Resolution Attachment 2: Technical Support Document for Post-Construction Requirements (track changes version of May14, 2012 Draft)
2. Post-Construction Requirements (track changes accepted)
3. Public Comment Letters Received on May 14, 2012 Draft Resolution (link)
4. Public Comments Received on May 14, 2012 Draft Resolution and Central Coast Water Board Staff Responses (link)
5. Key Issues in Public Comments on May 14, 2012 Draft Resolution and Central Coast Water Board Staff Responses
6. Key Milestones and History of the Central Coast Joint Effort