

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
January 21, 2015 10:00 am



Please accept the following comments from the City of San Dimas regarding the above reference matter:

“Please accept a sincere concern with storm water quality requirements. Regardless of any debate associated with the process, requirements, effectiveness, or best practices regarding efforts to address storm water quality; there has to be the financial capacity in place to implement successful storm water quality programs and requirements.

Storm water quality measures will require serious infrastructure – expensive infrastructure and ongoing operating costs.

In many ways, a program to adequately and properly fund storm water provisions is more important than the permit requirements themselves. Without the financial capacity to fully implement storm water permit requirements, those permit requirements are just words on paper. Adopting regulations and assigning the implementation to local governments may be convenient, but it clearly provides no answer to the funding issue. Assessing fines to local governments for non-compliance may emphasize attention through penalty, but it is also unproductive.

The state (and federal) government have identified storm water quality as a state and federal issue – if it is important enough to establish regulations, it is important enough to provide resources for those regulations to be implemented. Conversely, if it is not important enough to provide the resources to implement regulations; just how important are the regulations?

This is a new additional and significant expense for us. As cities, we have extracted money from our municipal operating budgets to muster what has been needed for these preliminary studies required by the MS-4 permit. However, you can only muster financially for a short time before the cupboard is bare – please accept our call for sufficient resources to accompany storm water requirements. There is a reality we all face – regardless of what is required; nothing meaningful will happen without sufficient money to comprehensively implement the serious infrastructure and operating costs of storm water management.

When sufficient storm water resources are provided – storm water quality requirements and provisions can be implemented.”

Thank you,  
Blaine Michaelis

**Blaine Michaelis**

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