



Public Comment  
CA Stormwater Authority  
Deadline: 3/20/18 by 12 noon

**DEPARTMENT OF PUBLIC WORKS**

**Matt Machado, PE, LS**  
Director, County Surveyor

**Chris Brady, PE**  
Deputy Director - Design/Survey/Fleet Maintenance

**Frederic Clark, PE, LS**  
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March 13, 2018

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter – California Stormwater Authority**

Dear Ms. Townsend:

On behalf of Stanislaus County, I am writing to express our support for the State Water Board's proposed Resolution Approving the Formation of the California Stormwater Authority as a joint powers authority (JPA) and authorizing the State Water Board Executive Director to execute the subject Joint Powers Agreement, on behalf of the State Water Board.

Over the period of time since the State issued our first National Pollutant Discharge Elimination System (NPDES) stormwater permit, the scope, requirements, and cost of the permit have increased significantly. At the same time, our ability to significantly increase funding for stormwater is severely limited, and we are continuously looking for ways to be as efficient as possible.

While Regional Water Boards may take varied approaches to constructing NPDES permits, a comparison of the stormwater permits issued across the state show that many of the core requirements are virtually the same. Additionally, the questions raised by a total maximum daily load (TMDL) for a particular pollutant and the work necessary to identify and develop best management practices (BMPs) to meet a waste load allocation (WLA) for that pollutant can be applied broadly, whether the affected waterbody is in northern or southern California.

Opportunities exist to be more efficient with our limited resources through leveraging and collaboration. However, what we often lack is a ready mechanism to take advantage of those opportunities, efficiently and effectively. The proposed JPA would provide just such a mechanism.

Thank you for the opportunity to comment on this important Resolution. If you have any questions about our support, please contact Dhyan Gilton, Stormwater Program Manager at (209) 525-7538.

Sincerely,

Matthew Machado, PE, LS  
Director of Public Works