



Ventura Countywide Stormwater Quality Management Program

Participating Agencies

August 24, 2026

Camarillo

State Water Resources Control Board
Attention: Courtney Tyler, Clerk to the Board
P.O. Box 100,
Sacramento, CA 95812-0100

County of Ventura

Submitted via email:

Fillmore

commentletters@waterboards.ca.gov
Jennifer.Toney@waterboards.ca.gov

Moorpark

SUBJECT: COMMENT LETTER – PROP 4 SWGP GUIDELINES

Ojai

Dear Ms. Toney and Ms. Tyler:

Oxnard

On behalf of the Ventura Countywide Stormwater Quality Management Program (Program), which includes the Ventura County Watershed Protection District, the County of Ventura and the incorporated cities of Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Ventura, Santa Paula, Simi Valley, and Thousand Oaks, thank you for the opportunity to provide comments on the Draft Proposition 4 Stormwater Grant Program (SWGP) Guidelines (Draft Guidelines) and for the comment deadline extension.

Port Hueneme

San Buenaventura

Santa Paula

The Program appreciates the efforts made by the State Water Resources Control Board (State Water Board) in developing the Draft Guidelines for the SWGP that will provide designated funding for the planning, design, and construction of meaningful stormwater projects. Collectively, these agencies operate the municipal storm drain system in Ventura County and discharge stormwater and urban runoff pursuant to the Los Angeles Regional National Pollutant Discharge Elimination System Municipal Stormwater Permit. The agencies are committed to working cooperatively to improve stormwater quality in our local waterways and beaches.

Simi Valley

Thousand Oaks

Ventura County
Watershed Protection
District

The Program appreciates that the Draft Guidelines incorporate opportunities for both project-specific Planning Grants as well as Implementation Grants. However, we identified several areas that would benefit from additional clarification regarding the requirements and funding for Planning Grants and the application process. The Program has reviewed the Draft Guidelines and requests consideration of the following comments.



Comments on the Draft Guidelines:

Comment #1: Develop Dedicated Scoring Criteria for Planning Projects

In reviewing the Draft Guidelines and Appendix C, it appears that the Draft Guidelines lack a full set of designated scoring criteria for Planning Projects and that the scoring criteria (*Appendix C, Tables 1-4*) appear to be primarily applicable to Implementation Projects. For example, *Appendix C Tables 3 and 4* are not applicable to Planning Projects. Thus, it is unclear how Planning Projects will be scored and selected. As currently written, the scoring puts Planning Projects at a disadvantage when evaluating total scores, if compared to Implementation Projects. The Program would like distinct and designated scoring criteria for planning grants added to the Draft Guidelines to ensure that Planning Projects are competitive and evaluated separately from Implementation Projects.

Recommendations for Comment #1:

Update the Draft Guidelines language and *Appendix C* to include dedicated scoring criteria for Planning Projects, including, but not limited to the following types of edits:

- a. Clarify that Planning Projects will be evaluated separately from Implementation Projects for dedicated planning funds.
- b. Edit *Table 5* to add a second column specifically for Planning Projects with a note that the total scores will be different between Planning and Implementation Projects.
- c. Remove components that are not applicable to Planning Projects (such as Operation and Maintenance Funding for Project, Plans and Specification, and CEQA Documents) from *Tables 3 and 4* as well as from the total score for Planning-only scoring criteria.

Comment #2: Clarification of Dedicated Planning Funding Amount

Smaller stormwater agencies such as ours lack dedicated stormwater funding sources and, as a result, depend primarily on General Fund allocations. This requires them to compete for limited resources with other critical community priorities, including fire protection, public safety, and health care. Stormwater projects in these areas require outside funds including grants to assist the agencies with the planning as well as the implementation of the projects. In addition, Proposition 4 is encouraging multijurisdictional/regional projects which in and of themselves require a higher level of planning and coordination among stakeholders before projects become shovel-ready, making it pivotal that funds be available for these project-specific planning efforts. Given

this need, the Program strongly supports that the Proposition 4 SWGP Final Guidelines include grant funding allocations for both Planning and Implementation Projects.

Footnote 2 of *Table 1. Grant Minimums and Maximums by Project Type* states “Of the total amount available under this program, no more than \$5 million will be utilized for planning funding” (Page 3). It is unclear from the Draft Guidelines if the \$5 million is either a) dedicated to planning-only efforts, or b) if that amount represents a maximum amount of potentially available funds for Planning Projects, which could result in less than \$5 million available for project planning.

The Program would like the planning grants amount to be a dedicated, earmarked amount, rather than just a funding cap or maximum. This will ensure that several projects will receive Planning Grants to get projects ready for the implementation stage.

Recommendation for Comment #2:

Update Footnote 2 on Page 3 to reflect a minimum amount of dedicated funding stated, rather than a planning fund cap. See combined ***Recommendation for Comments #2 and #3*** below for recommended specific language.

Comment #3: Increase Dedicated Allocation Amount of Planning Funds

In addition to Comment #2 above, the Program would like to request the current amount of \$5 million for Planning Grants be increased to \$10 million as the dedicated amount of funds available solely for planning projects. By encouraging planning level projects, this funding will allow for smaller counties and municipalities to be ready for future implementation grant opportunities.

Recommendation for Comments #2 and #3:

Update Footnote 2 on Page 3 to “Of the total amount available under this program, ~~no more than \$5 million~~ a minimum of \$10 million will be utilized for planning funding project-specific Planning Grants.”

Comment #4: Clarify Eligibility, General Program, and Additional Water Code Requirements for Planning Grants

In addition to establishing scoring criteria specific to Planning Projects (see **Comment #1**), there are other sections within the Draft Guidelines that should be revised so that it is clear what is required for Planning Projects. For example:

- Many subsections of the *Project Eligibility Requirements*, *General Program Requirements*, and *Additional Water Code Requirements* are not applicable to Planning Projects. Without further clarification, the Program is concerned that Planning Projects could be deemed ineligible.

- While “planning and design” is listed as an eligible project type in *Overview I.B. Project Eligibility Requirements*, it is unclear if the requirements for **all projects** (see section starting with “all projects must meet the following requirements”), listed on Page 5, are expected to be applicable to planning-only projects as well (many of the items listed appear to be applicable to implementation projects only).
- Additional requirements stated in *Section III. General Program Requirements* and *Section IV. Additional Water Code Requirements* also appear to only be applicable to Implementation Projects. We recommend the language be clarified so that Planning Projects are clearly eligible and can be just as competitive as Implementation Projects.

Recommendations for Comment #4:

Update the Draft Guidelines so that there is a clear distinction as to what is applicable to and required for Planning Projects versus Implementation Projects. Examples of language that should be updated includes, but is not limited to, the following:

- a. Update *I. Eligibility Requirements*, *B. Project Eligibility Requirements*, “All projects must meet the following requirements” list on Page 5 to clearly identify which items are applicable to Planning Projects, and/or Implementation Projects. For example, clarify that the following listed items are only applicable to Implementation Projects:
 - “Be operated and maintained for the project’s useful life;
 - Demonstrate the project can be completed within the appropriation time frame and can meet specified timelines for completing specific project milestones, such as California Environmental Quality Act (CEQA) and permitting requirements, as specified in the funding solicitation;
 - Demonstrate adequate rights of way for the useful life of the project; and
 - Demonstrate adequate water rights for implementation of the project, if applicable.”
- b. Update *III. General Program Requirements*, *H. Operations and Maintenance* to clearly state that it is only applicable to Implementation Projects. We recommend updating the first sentence to “The Recipients of Implementation Grants shall operate and maintain the facility...”
- c. Update *III. General Requirements*, *I. Signage, Education, and Outreach* to state “**all implementation projects must include signage...**”

- d. Update *IV. Additional Water Code Requirements, D. Water Metering Compliance* so that it is clear that this only applies to Implementation Projects.

Comment #5: Update Cost Reimbursement to include Planning Grants

The Draft Guidelines include guidance for eligible reimbursement of project expenses in *Section VI. Reimbursement of Costs*. While the list of reimbursable costs includes several components of Planning Projects, it is unclear whether the list itself only applies to Implementation Projects. The Draft Guidelines state that “Reimbursable costs include the reasonable costs necessary for successful project implementation, including but not limited to...” and does not mention Planning Projects or planning funds. We suggest clarifying the language to make it clear that Planning Projects are eligible to receive cost reimbursement under the reimbursement guidelines.

Recommendation for Comment #5:

Update *Section IV. Reimbursement of Costs* language on Page 16 to “Reimbursable costs include the reasonable costs necessary for successful project planning and/or implementation, including but not limited to...”

Comment #6: Add a Concept Proposal Phase

The Program has reviewed the comments submitted by the California Stormwater Quality Association (CASQA) on the Draft Guidelines and encourages the State Water Board to give consideration to CASQA's recommendation for the addition of a concept proposal phase to the application process. The Program strongly agrees with this comment since the aim is to save time and resources for applicants. A two-step application process including an initial concept proposal will make the application process more accessible for those agencies that may not have the ability or capacity to go through the robust full application process without prior indication that their project may be selected for funding.

Recommendation for Comment #6

Incorporate CASQA's recommendation to add an initial 30-day concept proposal or pre-application phase to the application process.

On behalf of the Ventura Countywide Stormwater Quality Management Program, thank you for your time and the opportunity to submit these comments. If you have any questions, please contact me at (805) 662-6737, or via email at Hayley.Luna@venturacounty.gov.

Comments on Draft Prop 4 SWGP Guidelines

August 24, 2026

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Sincerely,

A handwritten signature in cursive script that reads "Hayley Luna".

Hayley Luna, Chair

On Behalf of the Ventura Countywide Stormwater Management Program

cc: Ventura Countywide Stormwater Quality Management Program Participating
Agencies