

## **APPENDIX 8A**

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Summary of Comments: Administrative Draft SWRP



**TECHNICAL MEMORANDUM**

DATE: June 21, 2018 Project No.: 755-10-17-01  
SENT VIA: EMAIL

TO: Angela Spain

CC: Brandon Davison

FROM: Natalie Muradian, PE, RCE #84895

REVIEWED BY: Doug Moore, PE, RCE #58122

SUBJECT: City of Chico (Big and Little Chico Creeks) SWRP – Response to Comments on Administrative Draft of SWRP

This Technical Memorandum presents the response to comments received on the Administrative Draft of the City of Chico (Big and Little Chico Creeks) Storm Water Resource Plan (SWRP). Comments were requested from the City, Technical Advisory Committee (TAC), and the State Grant Manager. Comments received from the City and the TAC are included in Table 1. Comments received from the State Grant Manager are included in Attachment A.

*Funding has been provided in full or in part through an agreement with the State Water Resources Control Board using funds from Proposition 1. The contents of this document do not necessarily reflect the views and policies of the foregoing, nor does the mention of trade names or commercial products constitute endorsement or recommendation for use.*

*This document is the work product for Task 4.6 of Grant Agreement No. D1612613 between the City of Chico and the California State Water Resource Control Board.*

**Table 1. Response to Comments on Administrative Draft SWRP<sup>(a)</sup>**

No.	Name	Comment	Response
1	Angela Spain	1. Pg. ES-5: The outreach summary makes it seem like we did each item for every public meeting. It wasn't possible to advertise for each meeting at the Silver Dollar Fair and the Thursday Night Markets. Just need to add clarification language.	A sentence was added to ES-5 to convey that not each media outlet was contacted for each meeting.
2	Angela Spain	2. Pg. ES-15 (vs. pg. 6-5 – doesn't seem like these match up) Project 77 – Butte County Schools. 7 of these projects are delayed until 2038. This information isn't included in the pg. 6-5.	Section 6.4, Table 6-7, Section 6.8, and Section ES.6.2 were edited to be consistent and to convey that although the project description includes 25 projects, the school district has identified 6 high priority projects that could be completed within the next 3 years. The rest of the projects were assumed to be implemented at one campus per year.
3	Angela Spain	3. Pg. 1-2 – 1.3 Agencies within the Watershed Dayton Irrigation District provides water to a small area southwest of the City. I couldn't find verification of this on LAFCo's website. Can you verify where this information came from?	We removed this bullet. This information came from a GIS shapefile that was from the State and may be out of date. We also checked LAFCo's website and didn't see it either.
4	Angela Spain	4. ES 1-4 – NPDES Phase I MS4 Permit The monitoring performed for this program ... locations before and after the LID projects are implemented". The Special Studies Program started monitoring after the LID projects were installed. That program did not monitor before the LID projects were implemented.	"Before and" were removed from Section 1.4.1.1.2. There is no Section ES 1-4 nor a page ES 1-4.
5	Angela Spain	5. Pg. 1-14 – 1.7.4 Habitat The LCC ... agriculture). The bracket needs to be removed.	Removed bracket.
6	Angela Spain	6. Pg. 2-1 – 2.1 Stakeholder Outreach Plan identifies ... local ratepayers. Who are these ratepayers?	Deleted "local ratepayers, developers, locally regulated commercial and industrial stakeholders" because they are not included in the outreach plan. "Agencies" were added into Section 2.1.
7	Matt Thompson	Section 1.3 Agencies within the Watershed: Butte County owns and maintains storm drain facilities within the study area but outside city jurisdiction.	This sentence about Butte County was added to the second bullet in Section 1.3.
8	Matt Thompson	Section ES1. Introduction and description of watershed and subwatersheds: Watershed defined by State	The following sentence was added to ES.1: "...as defined by the National Hydrography Dataset and selected based on local knowledge of the drainage and creek systems"

(a) Administrative Draft was reviewed by the City, Technical Advisory Committee, and the State Grant Manager.

# **ATTACHMENT A**

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Grant Manager Comments

SWRP Review

<b>SWRP Title:</b>	City of Chico SWRP
<b>Applicant:</b>	City of Chico
<b>FAAST PIN:</b>	35525
<b>Date Submitted:</b>	5/23/2018

**Rating 3 - Meets the requirements, Plan element is fully addressed and supported by well-presented documentation and logical rationale.**  
**2 - Moderately meets requirements. Plan element is addressed and some backup is provided. Needs some improvements.**  
**1 - Plan element partially addressed and little to no documentation and/or rationale is presented. Needs substantial improvements.**  
**0 - Does not meet requirements (missing information).**

Reviewer Name	SWB Division	Review Date	Concurrence Finding
Brandon Davison	DFA	5/30/2018	

Guidelines Sections	Water Code Section	Required by Water Code	Plan Element	Brandon Davison		West Yost
				Rating	Comments	Response to Comments
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)	10565(c) 10562(b)(1) 10565(c)	Y	1. Plan identifies watershed and subwatershed(s) for storm water resource planning.	3	HUC 10 watersheds	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	2. Plan is developed on a watershed basis, using boundaries as delineated by USGS, CalWater, USGS Hydrologic Unit designations, or an applicable integrated regional water management group, and includes a description and boundary map of each watershed and sub-watershed applicable to the Plan.	3	Complete	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	3. Plan includes an explanation of why the watershed(s) and sub-watershed(s) are appropriate for storm water management with a multiple-benefit watershed approach;	3	Complete	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	4. Plan describes the internal boundaries within the watershed (boundaries of municipalities; service areas of individual water, wastewater, and land use agencies, including those not involved in the Plan; groundwater basin boundaries, etc.; preferably provided in a geographic information system shape file);	2	If applicable: Those entities not involved are not called out.	Agencies in the watershed that did not participate in the development of the SWRP have been identified in Section 1.3. Additionally, Table 2-1 identifies agencies and organizations that were identified and invited to participate but were not involved.
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	5. Plan describes the water quality priorities within the watershed based on, at a minimum, applicable TMDLs and consideration of water body-pollutant combinations listed on the State's Clean Water Act Section 303(d) list of water quality limited segments (a.k.a impaired waters list);	3	Complete	

Guidelines Sections	Water Code Section	Required by Water Code	Plan Element	Brandon Davison		West Yost
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WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	6. Plan describes the general quality and identification of surface and ground water resources within the watershed (preferably provided in a geographic information system shape file);	3	Complete	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	7. Plan describes the local entity or entities that provide potable water supplies and the estimated volume of potable water provided by the water suppliers;	3	Complete	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	8. Plan includes map(s) showing location of native habitats, creeks, lakes, rivers, parks, and other natural or open space within the sub-watershed boundaries; and	3	Map provided	
WATERSHED IDENTIFICATION (GUIDELINES SECTION VI.A)		N	9. Plan identifies (quantitative, if possible) the natural watershed processes that occur within the sub-watershed and a description of how those natural watershed processes have been disrupted within the sub-watershed (e.g., high levels of imperviousness convert the watershed processes of infiltration and interflow to surface runoff increasing runoff volumes; development commonly covers natural surfaces and often introduces non-native vegetation, preventing the natural supply of sediment from reaching receiving waters).	2	Complete but not quantified.	Section 1.7 has been revised to include the quantification. The quantification includes breaking the PAW into 3 sections (east of the City, City, and west of the City). Each section has a discussion on the overall impervious percent and its corresponding percentage of the PAW.
WATER QUALITY COMPLIANCE (GUIDELINES SECTION V)	10562(d)(7)	Y	10. Plan identifies activities that generate or contribute to the pollution of storm water or dry weather runoff, or that impair the effective beneficial use of storm water or dry weather runoff.	3	Complete	
WATER QUALITY COMPLIANCE (GUIDELINES SECTION V)	10562(b)(5)	Y	11. Plan describes how it is consistent with and assists in, compliance with total maximum daily load implementation plans and applicable national pollutant discharge elimination system permits.	3	Complete	
WATER QUALITY COMPLIANCE (GUIDELINES SECTION V)	10562(b)(6)	Y	12. Plan identifies applicable permits and describes how it meets all applicable waste discharge permit requirements.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)	10565(a)	Y	13. Local agencies and nongovernmental organizations were consulted in Plan development.	3	Complete; should maybe add reference to Section 2 since it might apply here.	Added Section 2.3 to Item 13 in the Checklist.
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)	10562(b)(4)	Y	14. Community participation was provided for in Plan development.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	15. Plan includes description of the existing integrated regional water management group(s) implementing an integrated regional water management plan.	3	Complete	

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ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	16. Plan includes identification of and coordination with agencies and organizations (including, but not limited to public agencies, nonprofit organizations, and privately owned water utilities) that need to participate and implement their own authorities and mandates in order to address the storm water and dry weather runoff management objectives of the Plan for the targeted watershed.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	17. Plan includes identification of nonprofit organizations working on storm water and dry weather resource planning or management in the watershed.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	18. Plan includes identification and discussion of public engagement efforts and community participation in Plan development.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	19. Plan includes identification of required decisions that must be made by local, state or federal regulatory agencies for Plan implementation and coordinated watershed-based or regional monitoring and visualization	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	20. Plan describes planning and coordination of existing local governmental agencies, including where necessary new or altered governance structures to support collaboration among two or more lead local agencies responsible for plan implementation.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	21. Plan describes the relationship of the Plan to other existing planning documents, ordinances, and programs established by local agencies.	3	Complete	
ORGANIZATION, COORDINATION, COLLABORATION (GUIDELINES SECTION VI.B)		N	22. (If applicable)Plan explains why individual agency participation in various isolated efforts is appropriate.	3	N/A	
QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	23. For all analyses: Plan includes an integrated metrics-based analysis to demonstrate that the Plan's proposed storm water and dry weather capture projects and programs will satisfy the Plan's identified water management objectives and multiple benefits.	3	Complete	
QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	24. For water quality project analysis (section VI.C.2.a) Plan includes an analysis of how each project and program complies with or is consistent with an applicable NPDES permit. The analysis should simulate the proposed watershed-based outcomes using modeling, calculations, pollutant mass balances, water volume balances, and/or other methods of analysis. Describes how each project or program will contribute to the preservation, restoration, or enhancement of watershed processes (as described in Guidelines section VI.C.2.a)	3	NPDES okay, but revise to page 5-45 (not 5-42), quantitative methods provided in Appendix 5C.	Updated the page number to 5-45 and added Appendix 5C to Checklist.

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QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	25. For storm water capture and use project analysis (section VI.C.2.b): Plan includes an analysis of how collectively the projects and programs in the watershed will capture and use the proposed amount of storm water and dry weather runoff.	3	Okay	
QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	26. For water supply and flood management project analysis (section VI.C.2.c): Plan includes an analysis of how each project and program will maximize and/or augment water supply.	3		
QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	27. For environmental and community benefit analysis (section VI.C.2.d): Plan includes a narrative of how each project and program will benefit the environment and/or community, with some type of quantitative measurement.	3		
QUANTITATIVE METHODS (GUIDELINES SECTION VI.C)		N	28. Data management (section VI.C.3): Plan describes data collection and management, including: a) mechanisms by which data will be managed and stored; b) how data will be accessed by stakeholders and the public; c) how existing water quality and water quality monitoring will be assessed; d) frequency at which data will be updated; and e) how data gaps will be identified.	3		
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(1)	Y	29. Plan identifies opportunities to augment local water supply through groundwater recharge or storage for beneficial use of storm water and dry weather runoff.	3	Provided	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(2)	Y	30. Plan identifies opportunities for source control for both pollution and dry weather runoff volume, onsite and local infiltration, and use of storm water and dry weather runoff.	3	Provided	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(3)	Y	31. Plan identifies projects that reestablish natural water drainage treatment and infiltration systems, or mimic natural system functions to the maximum extent feasible.	3	Provided	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(4)	Y	32. Plan identifies opportunities to develop, restore, or enhance habitat and open space through storm water and dry weather runoff management, including wetlands, riverside habitats, parkways, and parks.	3	Provided	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(5), 10562(b)(8)	Y	33. Plan identifies opportunities to use existing publicly owned lands and easements, including, but not limited to, parks, public open space, community gardens, farm and agricultural preserves, school sites, and government office buildings and complexes, to capture, clean, store, and use storm water and dry weather runoff either onsite or offsite.	3	Provided	



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IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(d)(6)	Y	34. For new development and redevelopments (if applicable): Plan identifies design criteria and best management practices to prevent storm water and dry weather runoff pollution and increase effective storm water and dry weather runoff management for new and upgraded infrastructure and residential, commercial, industrial, and public development.	2	Please add reference to The City's Post-Construction Standards Plan since it gets a mention here.	We revised the Checklist to include the page number referencing the Post-Construction Standards Plan in Section 2 and added a reference to Section 3.2.7.
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)	10562(b)(2)	Y	35. Plan uses appropriate quantitative methods for prioritization of projects. (This should be accomplished by using a metrics-based and integrated evaluation and analysis of multiple benefits to maximize water supply, water quality, flood management, environmental, and other community benefits within the watershed.)	3	Complete	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)		N	36. Overall: Plan prioritizes projects and programs using a metric-driven approach and a geospatial analysis of multiple benefits to maximize water supply, water quality, flood management, environmental, and community benefits within the watershed.	3	Complete	
IDENTIFICATION AND PRIORITIZATION OF PROJECTS (GUIDELINES SECTION VI.D)		N	37. Multiple benefits: Each project in accordance with the Plan contributes to at least two or more Main Benefits and the maximum number of Additional Benefits as listed in Table 4 of the Guidelines. (Benefits are not counted twice if they apply to more than one category.)	3	Complete	
IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)		N	38. Plan identifies resources for Plan implementation, including: 1) projection of additional funding needs and sources for administration and implementation needs; and 2) schedule for arranging and securing Plan implementation financing.	3	Complete	
IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)	10562(d)(8)	Y	39. Plan projects and programs are identified to ensure the effective implementation of the storm water resource plan pursuant to this part and achieve multiple benefits.	3	Provided	
IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)	10562(d)(8)	Y	40. The Plan identifies the development of appropriate decision support tools and the data necessary to use the decision support tools.	2	Are there more tools that can be considered?	We have added a discussion to Section 6.11.1 on a GIS Decision Support Tool for identifying and tracking SWRP projects.

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IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)		N	41. Plan describes implementation strategy, including: a) Timeline for submitting Plan into existing plans, as applicable; b) Specific actions by which Plan will be implemented; c) All entities responsible for project implementation; d) Description of community participation strategy; e) Procedures to track status of each project; f) Timelines for all active or planned projects; g) Procedures for ongoing review, updates, and adaptive management of the Plan; and h) A strategy and timeline for obtaining necessary federal, state, and local permits.	3	Provided	
IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)	10562(b)(7)	Y	42. Applicable IRWM plan: The Plan will be submitted, upon development, to the applicable integrated regional water management (IRWM) group for incorporation into the IRWM plan.	3	Will be submitted	
IMPLEMENTATION STRATEGY AND SCHEDULE (GUIDELINES SECTION VI.E)		N	43. Plan describes how implementation performance measures will be tracked.	3	Provided	
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)	10562(b)(4)	Y	44. Outreach and Scoping: Community participation is provided for in Plan implementation.	2	Okay but could likely use more info. Perhaps reference more of Section 2 as a whole?	We originally only had Section 2.4 (TAC) listed, so we added a reference to Section 2.5 (Public Outreach) and Section 2.2 (Summary of Public Engagement Efforts and Community Participation).
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	45. Plan describes public education and public participation opportunities to engage the public when considering major technical and policy issues related to the development and implementation.	2	Okay	We originally only had Section 2.4 (TAC) listed, so we added a reference to Section 2.5 (Public Outreach), Section 5.4 (to discuss the community participation in prioritizing stormwater values), and Section 6.11.5 (Community Participation Strategy).
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	46. Plan describes mechanisms, processes, and milestones that have been or will be used to facilitate public participation and communication during development and implementation of the Plan.	2	Okay	We originally only had Section 2.4 (TAC) listed, so we added a reference to Section 2.5 (Public Outreach) and Section 6.11.5 (Community Participation Strategy).
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	47. Plan describes mechanisms to engage communities in project design and implementation.	2	Okay	We originally only had Section 2.4 (TAC) listed, so we added a reference to Section 2.5 (Public Outreach) and Section 6.11.5 (Community Participation Strategy).
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	48. Plan identifies specific audiences including local ratepayers, developers, locally regulated commercial and industrial stakeholders, nonprofit organizations, and the general public.	3	Discussed	
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	49. Plan describes strategies to engage disadvantaged and climate vulnerable communities within the Plan boundaries and ongoing tracking of their involvement in the planning process.	3	Discussed	

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EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	50. Plan describes efforts to identify and address environmental injustice needs and issues within the watershed.	3	Discussed	
EDUCATION, OUTREACH, PUBLIC PARTICIPATION (GUIDELINES SECTION VI.F)		N	51. Plan includes a schedule for initial public engagement and education.	3	Provided	