



# American Basin Council of Watersheds

P.O. Box 1311 Roseville, CA 95678-8311  
Phone / Fax: (916) 773-6575 Email: [dcc@surewest.net](mailto:dcc@surewest.net)

## Cooperating Organizations

**Dry Creek Watershed**  
Adelante High School  
California Conservation Corps  
California Department of Fish and Game  
California Native Plant Society,  
Sacramento Valley Chapter  
Central Valley Regional  
Water Quality Control Board  
City of Roseville  
Dry Creek Conservancy  
Granite Bay Flycasters  
Placer County Board of Supervisors  
Placer County Department of  
Environmental Health  
Placer County Fish and Game  
Commission  
Placer County Flood Control and  
Water Conservation District  
Placer County  
Resource Conservation District  
Rio Linda Elverta  
Recreation and Park District  
Roseville Joint Union High School  
District  
Sacramento Area Flood Control  
Agency  
Sacramento County Board of  
Supervisors  
Sacramento Area Creeks Council  
Sacramento Valley Conservancy  
Sierra College  
U.S. Fish and Wildlife Service  
**Auburn Ravine/Coon Creek  
Watershed**  
California Department of Fish and  
Game  
Central Valley Regional  
Water Quality Control Board  
City of Auburn  
City of Lincoln  
Coon Creek Restoration Project  
Nevada Irrigation District  
Ophir Area Property Owners  
Association  
PG&E  
Placer County Board of Supervisors  
Placer County Fish and Game  
Commission  
Placer County  
Resource Conservation District  
Placer County Water Agency  
South Sutter Water District  
U.S. Fish and Wildlife Service  
Western Placer Citizens for  
Agricultural and Rural  
Environment

To: Members and staff of the Central Valley Regional Water Quality Control Board

Re: American Basin Council of Watersheds (ABCW) comments regarding agenda item 19 and the proposal to “encourage the use of SEPs to aid disadvantaged communities within the central valley region” on Central Valley Regional Water Quality Control Board agenda February 7, 2014.

Good morning. I am Gregg Bates here on behalf of the American Basin Council of Watersheds to comment on the agenda item. The Council is a stakeholder group that has worked together since 1996 to collaborate on environmental restoration, monitoring, and education programs to benefit the natural environment of the greater Sacramento region.

The Council discussed this proposal at its regular meeting on February 5, 2014. Stakeholders present included representatives from City of Roseville, City of Rocklin, Placer County, Regional Water Authority, Placer Resource Conservation District, Dry Creek Conservancy, and others.

The consensus was that we are concerned about what seems to be a fundamental shift in the priorities of this program. We appreciate staff's desire to benefit disadvantaged communities with this program, and understand the desire to work with an established and reputable foundation to implement projects, as appropriate, in DACs. However, we believe it important to continue to recognize the geographic and other nexus criteria provided in Attachment 1 of the current policy to provide benefit to the communities suffering the impact of the violation. We are also concerned that the proposed shift in the use of these funds seems to promote a specific segment of the population and a specific organization.

In our experience, it has been difficult *in general* for dischargers to enter into settlements that fund projects related to the violation, and not only for projects related to disadvantaged communities. The stakeholders would like to work more closely with staff to facilitate proposals for projects that use settlement funds in the community of the violation.

We would like to suggest that staff consider coordination with Regional Water Management Groups to identify potential uses of these funds. These groups have been established through the Integrated Regional Water Management (IRWM) Program under the California Department of Water

Resources. There are currently 49 approved regional groups covering most of the geographic area of the state. The regional groups include a diversity of stakeholders and could help staff identify priorities for use of these program funds. Regional Board staff have been active participants in the IRWM process. We believe that there can be a natural alignment of many Board programs, such as SEP, with the collaborative IRWM effort.

We would like to schedule a meeting with Robert L'Heureux to discuss the issue further, as he has recently offered.