



# City of Santa Barbara

Parks and Recreation Department

6/16/09 Bd Mtg Item E  
ARRA  
Deadline: 6/10/09 by 12 noon

www.sbparksandrecreation.com  
www.SantaBarbaraCA.gov

Administration  
Tel: 805.564.5431  
Fax: 805.564.5480

Parks Division Office  
Tel: 805.564.5433  
Fax: 805.897.2524

Recreation Division  
Office  
Tel: 805.564.5418  
Fax: 805.564.5480

Creeks Division Office  
Tel: 805.897.2658  
Fax: 805.897.2626

620 Laguna St.  
PO Box 1990  
Santa Barbara, CA  
93102-1990

Golf Course  
Tel: 805.564.5547  
Fax: 805.897.2644  
3500 McCaw Ave.  
PO Box 1990  
Santa Barbara, CA  
93102-1990

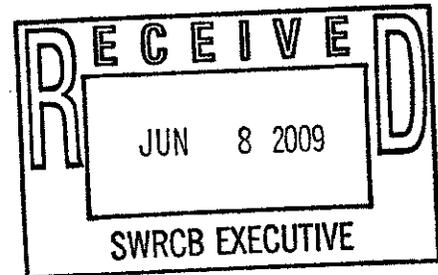
Community Services  
Tel: 805.963.7567  
Fax: 805.963.7569  
423 W. Victoria St.  
PO Box 1990  
Santa Barbara, CA  
93102-1990

June 8, 2009

Ms. Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 "I" Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Fax: (916) 341-5620  
E-mail: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Re: Comment Letter – ARRA Subsidy



Dear Ms. Townsend and Boardmembers:

Thank you for the opportunity to provide comments regarding the implementation of the American Recovery and Reinvestment Act of 2009 (ARRA) subsidy funds for clean water state revolving fund (CWSRF) projects. I respectfully submit the following comments on behalf of the City of Santa Barbara's Creeks Division (City).

### Issue 1: Whether to use the Additional 15 Percent for new Expanded Use or DAC Wastewater Projects

The City recommends that the Board adopt "Option 1B: Allocate Additional 15 Percent as Subsidy Funds to new Expanded use CWSRF Projects."

As described in the staff report, this option would allocate \$42 million of the ARRA funds for new expanded use projects. Wastewater projects in disadvantaged communities (DAC) would receive a total of \$70 million in ARRA subsidy funds.

Option 1B provides for the most equitable distribution of limited ARRA funds relative to new expanded use and DAC wastewater funding requests received by the Division. The staff report indicates that the Division received over \$150 million in subsidy requests for new expanded use projects. A \$42 million allocation of ARRA funds would satisfy 28% of that demand. Coincidentally, the \$70 million in ARRA funds *already* allocated to DAC wastewater projects equals 28% of the \$250 million demand identified in requests received by the Division.

It is important to note that Option 1B does not preclude DAC expanded use projects from receiving additional ARRA funds – it simply provides an opportunity for non-DAC expanded use projects to be eligible for funding as well. Thus, while construction of both types of projects is critical to improving water quality in

California, Option 1B provides the broadest opportunity for water quality improvement and the fairest distribution of federal ARRA funds.

## **Issue 2: Process and Criteria for Allocating ARRA Funds to new Expanded use Projects**

The City recommends that the Board adopt "Option 2B: Funding priority for urban stormwater projects with earliest construction date."

As described in the staff report, this option would reserve the expanded use funding for urban stormwater projects that include traditional structural solutions as well as low impact development.

Option 2B would provide a significant boost to stormwater quality improvement efforts throughout the state. As noted in the report, using the ARRA funds for urban stormwater projects would help balance past Nonpoint Source (NPS) funding inequities, where available grant funding was awarded to other NPS project categories.

In addition, when competing for federal funds, stormwater projects throughout the state should be placed on equal footing, regardless of whether they are located in disadvantaged communities or not. Federal and state stormwater regulatory mandates apply to all communities, not just DACs. Especially in these tough economic times, all cities and counties are desperately in need of stormwater quality improvement funding. Furthermore, as noted above, Option 2B does not preclude DAC expanded use projects from receiving ARRA funds – it simply provides an opportunity for non-DAC expanded use projects to be eligible for funding as well.

Option 2B will stimulate the state economy by getting the ARRA funds out quickly. And since better weather permits more public works construction, summer is the best season to distribute the ARRA funding. Just this morning, the White House was calling for ARRA funds to be distributed and used this summer.

Adopting Option 2C puts too much focus on DACs. Prioritizing stormwater projects *solely* on the basis of DAC criteria could slow the disbursement of ARRA funds and result in less innovative and effective projects being built. High quality "shovel-ready" projects with the potential to create many jobs might not receive funding simply because they are not located in DACs. Moreover, the Board has been a leader in promoting low impact development in California, and the ARRA funds provide an opportunity to fund the construction of many innovative and effective designs. Projects should be evaluated on the merits of their innovation, efficiency, and effectiveness.

As an alternative to Option 2B, the City would recommend that the Board adopt "Option 2A: Funding priority for projects with the earliest construction start date." As noted in the report, these projects would be ranked based solely on their construction start date, regardless of the type of project or applicant." This option would adhere most strongly to the economic stimulus policy purpose of the ARRA by creating many new jobs over the next few months. However, this option may provide little or no stormwater quality benefit.

Thank you very much for your consideration. Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Cameron Benson". The signature is fluid and cursive, with the first name "Cameron" written in a larger, more prominent script than the last name "Benson".

Cameron Benson  
City of Santa Barbara