

**Dixon Regional Watershed Joint Powers Authority**

1170 N. Lincoln, Suite 110, Dixon, CA 95620 - Phone (707) 678-1655

June 10, 2009

**Re: "Comment Letter - ARRA Subsidy" - Implementation of Economic Recovery Legislation for the Clean Water State Revolving Fund Program.**

A draft item has been developed by State Water Resources Control Board staff to present to the State Board to clarify implementation of American Recover and Reinvestment Act of 2009 (ARRA) subsidy fund for the Clean Water State Revolving Fund (CWSRF) projects (ITEM). State Board staff recommends in the ITEM splitting \$42 Million in subsidy funds equally between disadvantaged communities (DACs) wastewater projects and new Expanded Use Projects. Expanded use projects are recommended to be urban stormwater projects for DACs. The staff makes two arguments to support this recommendation:

- Urban stormwater projects have not as much grant funding through the nonpoint source (NPS) solicitations as other NPS categories; and
- Urban stormwater projects represent DACs as they are located in counties with unemployment rates ranging from nine to 20 percent.

Additionally, the staff recommends developing a Competitive Project list with new Expanded Use stormwater projects totaling at least 125% of the available funds to meet competition requirements.

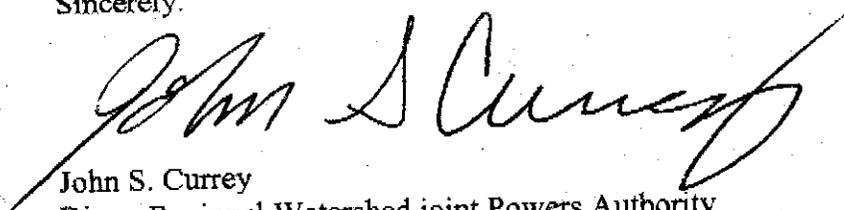
I recommend that projects be funded based upon some competitive criteria:

- Completeness of applications;
- Construction and implementation beginning in time frame that meets ARRA requirements;
- Impacts on disadvantaged communities as defined by considering the median income (relative to California median income) and the unemployment rate
- Assessment on the projects impacts on water quality, beneficial use and anti-degradation criteria

Please contact me at 707-678-1655 extension 105 or by email at [john.currey@ca.nacdn.net](mailto:john.currey@ca.nacdn.net) if you have any questions.

Thank you for allowing for comments.

Sincerely,

  
John S. Currey  
Dixon Regional Watershed joint Powers Authority

