

From: "Karen Christensen" <kchristensen@rcdsantacruz.org>
To: <commentletters@waterboards.ca.gov>
CC: "Kirsten Liske" <kliske@ecoact.org>, "Paul Robins" <paul.robins@rcdm...>
Date: Wednesday, June 10, 2009 11:20 AM
Subject: RE: Comment Letter - ARRA Subsidy

9 June 2009

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 3rd Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

r.e. ARRA Subsidy Fund for CWSRF Projects: SWRCB June 16, 2009 Meeting

To Whom it May Concern,

Thank you for considering the most appropriate use of ARRA and SWRCB funds to support economic recovery and watershed protection during this challenging time.

We offer the following comments on the above referenced item in response to the Discussion provided by the SWRCB staff in relation to the said item.

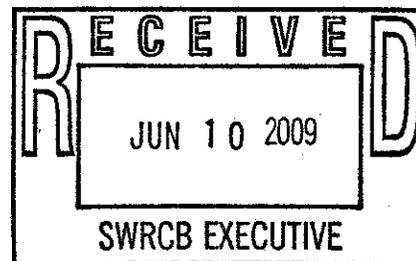
1. The Board has already prioritized stopped projects and we would like to request Awarded not Contracted projects be included as part of that priority. The Awarded not Contracted projects were thoroughly vetted through competitive grant selection processes but had not finalized/signed contracts before the stop work freeze December 18, 2008. In the case of Ecology Ecology Action, one project was awarded over one year ago by the SWRCB in May 2008, but was not contracted due to delays in negotiations between the state and regional board on who would manage the grant. The State made a commitment to fund the project, but it has not proceeded as a result of the funding freeze. Both Awarded and Awarded not Contracted projects that also meet ARRA requirements and priorities should be given top priority for funding, regardless of project category, and allow the SWRCB to move forward in good faith on its past investments and commitments.

1. Do not pre-select Urban Stormwater projects for priority in funding Expanded Use Projects. The staff recommendation in the discussion is to prioritize urban stormwater projects in Disadvantaged Communities (Option 2C in the Discussion). Several points of logic lead to our recommendation:
> 1. The analysis that staff utilize here does not comprehensively assess funding for all NPS activities from various funding sources throughout California, nor consider impact, pollutant load reduction, watershed plan prioritization or other important considerations.
> 2. This is not a stated priority within ARRA funding, while job creation (unemployment rate) and job creation (construction start date) are.
> 3. This pre-selected preference was not visible during the application period over the past months.

Given the above, we recommend the following prioritization for funding decisions under the CWSRF:

1. Include Awarded not contracted projects as part of the priority with already awarded contracts.

2. We agree with the Option 1A staff recommendation: "OPTION 1A: Equally split Additional 15 Percent as Subsidy Funds to new Expanded Use and DAC Wastewater Projects. In this scenario, \$21 million would be allocated as Subsidy Funds to new Expanded Use Projects, in addition to any unused



Subsidy Funds from the Restart Projects. Disadvantaged Community Wastewater Projects would receive an additional \$21 million in Subsidy Funds for a total of \$91 million in Subsidy Funds."

Thank you for considering our comments. If you have any questions or comments, please do not hesitate to contact me at (831) 464-2950 Ext 17.

Sincerely,

Karen Christensen, Executive Director
Resource Conservation District of Santa Cruz County
820 Bay Avenue, Suite 128
Capitola, CA 95010
Phone: (831) 464-2950, ext 17
Fax: (831) 475-3215