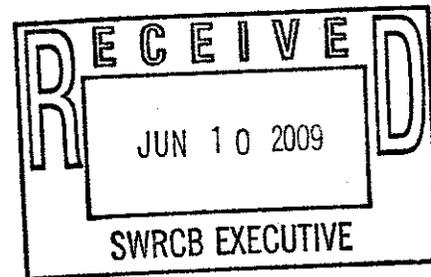


commentletters - concurrence with comments by Resource Conservation District of Santa Cruz County

From: "Kellyx Nelson" <kellyx@sanmateorcd.org>
To: <commentletters@waterboards.ca.gov>
Date: Wednesday, June 10, 2009 12:07 PM
Subject: concurrence with comments by Resource Conservation District of Santa Cruz County
CC: "Karen Christensen" <kchristensen@rcdsantacruz.org>, "Paul Robins" <paul.robins@rcdmonterey.org>, "Kirsten Liske" <kliske@ecoact.org>

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



Re: 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 concur with the following comments offered by the Resource Conservation District of Santa Cruz 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 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. All Awarded projects, including 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:

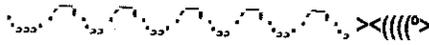
- > 1. The analysis that staff utilize here does not comprehensively assess funding for all NPS activities from various funding sources throughout California, nor consider impact, pollutant load reduction, watershed plan prioritization or other important considerations.
- > 2. This is not a stated priority 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 (650) 712-7765 or kellyx@sanmateorcd.org.



Kellyx Nelson
Executive Director
San Mateo County Resource Conservation District
625 Miramontes Street Suite 103
Half Moon Bay, CA 94019
phone: 650.712.7765
fax: 650.726.0494
www.sanmateorcd.org