



CACHUMA OPERATION AND MAINTENANCE BOARD

3301 LAUREL CANYON ROAD
SANTA BARBARA, CALIFORNIA 93105-2017
TELEPHONE (805) 687-4011 FAX (805)569-5825
www.ccrb-comb.org
contactus@cachuma-board.org

February 8, 2007

VIA E-MAIL and REGULAR MAIL

Mr. Lester Snow, Director
California Department of Water Resources
P.O. Box 942836
1416 9th Street
Sacramento CA 95814

Mr. Thomas Howard, Acting Executive Director
State Water Resources Control Board
1001 "I" Street
Sacramento CA 95814

Re: Integrated Regional Water Management Grant Program Guidelines

Dear Messrs. Snow and Howard:

As a Cooperating Partner of the Santa Barbara Countywide Integrated Regional Water Management Plan (IRWMP), Cachuma Operation & Maintenance Board (COMB) would like to urge the Department of Water Resources (DWR) and the State Water Resources Control Board (SWRCB) to protect the integrity of the Proposition 50 grant process and adhere to the established Integrated Regional Water Management Grant Program Guidelines (Guidelines) issued November 2004 by DWR and the SWRCB. In those Guidelines, two funding cycles were established, each with open competition for the IRWMP Implementation Grants funds from Chapter 8 of Proposition 50.

As President of COMB, I would like to submit the following comments of significant concern regarding the DWR and SWRCB recent evaluation of funding additional Round 1 proposals using funds designated for Round 2 of the Proposition 50 Implementation Grants process:

- The citizens of Santa Barbara County voted for Proposition 50 for the opportunity, as a South Coast competitor, to access approximately \$200 million in planning and implementation grant funding in an open and fair process.
- To take away funding designated for Round 2 in order to satisfy special interests, while other regions are working diligently to apply for the second round of funding, is inequitable and biased.
- Moving funds to Step 2 Round 1 changes the terms of engagement mid-stream in the current Proposition 50 application process, forcing COMB to compete with additional

*Carpinteria Valley Water District
City of Santa Barbara
Goleta Water District
Montecito Water District
Santa Ynez River Water Conservation District, Improvement District #1
General Manager/Secretary of the Board, Kathleen A. Rees*

players (delineated for the Proposition 84 process), and for less money within a larger competitive area.

- What DWR and SWRCB is proposing would limit COMB to only being eligible to apply for Prop 84 grant funds and compete for these funds with agencies that have already received funding from Prop 50.

With regard to the State's consideration of altering grant program guidelines, mid-stream in a two-round process, please take into account the following concerns:

- The investment(s) made to satisfy the existing guidelines for Proposition 50 cannot be ignored. The Cooperating Partners of the Santa Barbara Countywide IRWMP have, to date, collectively invested more than \$250,000 to produce an IRWMP, and that effort has demanded significant staff time of approximately 40 people from 29 different agencies within the County, over the past nine months.
- In addition, the boards and councils of these 29 agencies have reviewed and adopted a Memorandum of Understanding to coordinate under the current Proposition 50 guidelines.
- The demanding coordination effort made by the 29 participating agencies within Santa Barbara County in order to produce an IRWMP and integrate our projects is unprecedented. If this effort results only in a loss of opportunity due to a change in the rules, it is likely that we, as a region, may not accomplish this level of coordination again in the near future.
- We recognize that there is no guarantee that IRWMP efforts will result in successful implementation grant funding. However, it is only fair to ask participants to accept that risk if there is an open and competitive process. There is no fairness in the State's proposal to remove the open competition for Round 2 funding and move it to a revised and limited process when there are regions currently working in good faith to compete for it.

COMB, therefore, strongly urges DWR and the SWRCB to maintain the Proposition 50 Chapter 8 Round 2 funding process, as is, consistent with the will of the voters. At the very least, any and all funds remaining after additional proposed awards are allotted should be strictly reserved for the agencies and regions that have been diligently preparing IRWM Plans for Round 2 funding.

Sincerely,



C. Charles Evans, President
Cachuma Operation & Maintenance Board

cc: Santa Barbara Countywide IRWMP Cooperating Partners