THE BOARD OF SUPERVISORS
ALPINE COUNTY, CALIFORNIA

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December 5, 2006

State Water Resources Control Board
ATT: Ms. Tracie Billington
1001 I Street
Sacramento, CA 95814

RE: Alpine County Comments on SWRCB/DWR Draft Funding Recommendations

Dear Ms. Billington:

Thank you for the opportunity to comment on the State Water Resources Quality Control Board (SWRQCB) and Department of Water Resources (DWR) Draft Funding Recommendations for allocation of Integrated Regional Water Management Program (IRWMP) implementation grant funds.

There is approximately $180 million remaining for allocation by the SWRQCB under Proposition 50. In addition, in November the California voters approved Proposition 84, which earmarked an additional $1 billion for the IWRMP Grant Program. Due to the lengthy, expensive and arduous process of applying for the IRWMP grant funds, the Board of Supervisors suggests that DWR and SWRCB award the remaining nine grant applications from the 2006 grant cycle that did not receive funding, including Alpine County, from the $180 million still remaining in Proposition 50. This would benefit the state in the following ways:

- The critical capital improvement and water quality projects the remaining nine applicants have designed and submitted would not be forced to wait for another funding cycle to implement their projects. While these projects were successful in meeting the criteria for consideration in Step 2 of the funding process, they could not compete with larger municipalities primarily located in southern California and the Bay Delta. Immediately awarding the funds for applications that have all ready been reviewed would serve as a benefit to the residents of the respective jurisdictions, and meets the intent of Proposition 50 to improve statewide water infrastructure in a timely manner.

- The IWRMP grant application process designed by DWR and SWRCB was an extremely expensive and time consuming process, placing significant staffing and budgetary burdens upon those agencies applying for funds. The County's fiscal, administrative and

public works staff devoted significant time in the preparation of the application at taxpayer expense. Rather than duplicate the application process, wasting more public dollars and valuable time in the preparation of a whole new document, the Board of Supervisors encourages the SWRQCB and DWR to recognize the investment made and fund those applications it has in hand. This would also decrease the burden placed on staff at DWR and SWRQCB by allowing them to process applications that they have already reviewed and commented on.

- This process allows those jurisdictions still struggling to develop project applications additional time to formulate competitive proposals that meet the intent of the funding.

Although Alpine County was invited to submit its grant proposal in the second funding phase of Proposition 50, it was not approved – along with eight other applications. However, more than $100,000 million dollars was allocated to metropolitan cities and counties primarily in Los Angeles and the Bay Delta. While we recognize these highly populated areas of the state qualify as Statewide Priorities due to their extreme water quality supply and infrastructure needs, both areas received "earmarks" from Proposition 50 and Proposition 84. The IWRMP funding was one of the few sections within Proposition 50 that allowed for competitive funding on a statewide basis, but rural counties cannot compete if priorities continue to favor metropolitan areas.

There are approximately 22 California counties with resident populations of less than 100,000. The needs of these rural cities and counties should not be made secondary because of their limited population, but on *proportionate* public benefit. Geographic distribution should be a goal of DWR and SWRQCB in that ALL regions of the state have an opportunity to be considered for funding. At a minimum, each of the 58 California counties should be eligible to receive $1 million, which for many rural counties would provide a significant funding base to upgrade water quality and related infrastructure needs. It was the voters' expectation the Proposition 50 and 84 funding commitments would be dispersed equitably throughout the state.

The Board of Supervisors of Alpine County urge staff at the DWR and SWRQCB to seriously consider the recommendations contained herein. We look forward to your decision.

Very truly yours,

Gunter E. Kaiser

Gunter E. Kaiser
Chair

Cc: CSAC
RCRC
Assembly Member T. Leslie
Senator D. Cox