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VIA EMAIL

October 12, 2015

Jeanine Townsend
Clerk to the Board, State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Proposition 1 Storm Water Grant Program Guidelines

Dear Ms. Townsend:

Thank you for the opportunity to review and comment on the State Water Resources Control Board's (SWRCB) Storm Water Grant Program Proposition 1 Guidelines which establish the process and criteria that the SWRCB will use to solicit applications, evaluate and select proposals, and award grants pursuant to Prop 1. The Trust for Public Land looks forward to working with the SWRCB through this program.

We have reviewed the program guidelines and have summarized our comments below.

Planning Grants (Overview, page 2)

- SWRCB will award planning grants for the development of plans for storm water projects on a watershed scale that meet the Storm Water Resource Plan Guidelines and SB985. We anticipate that planning grants will only be granted to a few entities with sufficiently large jurisdictions. We suggest that SWRCB consider adding language that encourages grant recipients to partner with smaller organizations that can bring the perspective of multiple benefits to the planning process.

Implementation Grants (Eligible Project Types, page 4)

- The guidelines state that all projects must be included and implemented in an adopted IRWMP. The process for a project to be included in an adopted IRWMP can be long and involved may be an unnecessary barrier to SWRCB funding for some applicants that have not been actively involved with IRWMP development. We suggest revision of the guidelines to indicate that all projects must demonstrate consistency with an adopted IRWMP.
- The guidelines state that storm water capture projects must also be included in a Storm Water Resource Plan. We recommend that applicants must be required to demonstrate their project's consistency with the relevant Storm Water Resource Plan, and not be required to be named within the plan itself.

Multiple benefits (Program Preferences, page 7)

- Regarding multiple benefits, the guidelines state that "All projects must be multi-benefit and contain a minimum of two benefits..." We suggest making the language in the guidelines around multiple benefits stronger throughout. Moreover, true multi-benefit projects should have more than two benefits. We suggest that the required number of multiple benefits be increased to five to promote projects that have more benefits.
- We also suggest adding additional community health and social benefits to the list in section G. Program Preferences (page 7) under Community, such "increased walking and bicycling," "improved health indicators," and "community-driven planning and design" to increase benefits to disadvantaged communities. Further, under the Environmental benefits heading,

we suggest adding “increased climate resiliency” and “decreased urban heat island effect” to stress the need for projects to help communities adapt to a changing climate.

Matching Funds Requirements (page 5)

- The match requirement is 50% of total project costs and cannot use state funds. Moreover, from Table 2, page 6: “grant funds, including grants from other sources, cannot be used for matching funds”. The requirement that applicants are required to come up with 50% non-state match that cannot be derived from grant funds (even local or federal grant funds) will greatly limit the types of projects that are eligible for this competition. Other state agencies that are administering Proposition 1 grant programs (such as the Department of Fish and Wildlife, or the California State Coastal Conservancy) encourage projects to bring in cost-share from a variety of sources, including state grants.
- We are pleased to see that DACs and EDAs may request a reduced funding match. We recommend that SWRCB take a further step to making the program accessible to disadvantaged communities and waive the match requirement entirely, to put even fewer boundaries in the way of getting funding to DACs. 5-15% match will remain a barrier to communities, particularly with the non-state and non-grant funded match requirements outlined above.

Operations and Maintenance (page 11)

- As written, this section requires the grantee to operate and maintain the project throughout its useful life, assuming all O&M costs. This requirement will disqualify nonprofit applicants that do not have land tenure or O&M responsibilities. We request that language be added to this section that requires nonprofit applicants to have a MOU with the entity that will be responsible for O&M.

Implementation Proposal Application (Appendix C)

- Due to the complexity of the application, we recommend that SWRCB first solicit concept applications and then invite applicants to submit more information for the most competitive projects. This will ensure a diversity of multi-benefit projects is brought forward from a range of eligible applicants, and that smaller applicants are not dissuaded from attempting initial onerous application requirements.

Thank you again for the opportunity to comment on the Storm Water Grant Program Guidelines. Please let me know if you have any questions or require further information. I can be reached at 415.800.5309 or via e-mail at Mary.Creasman@tpl.org.

Sincerely,



Mary Creasman
California Director of Government Affairs