



June 26, 2015

Groundwater Sustainability Funding Program Staff
State Water Resources Control Board
P.O. Box 100 Sacramento, CA 95812-0100

Dear Sir or Madam:

Thank you for the opportunity to comment on the groundwater quality funding programs (GWQF) for the Proposition 1 Groundwater Sustainability Program. I make these comments as a representative of the Santa Ynez River Water Conservation District, ID#1. The District is a public water agency in Santa Barbara County.

GWQF Pre-Application comments:

1. While the Groundwater Sustainability Program clearly covers naturally occurring contaminants (chapter 10 section 79773), questions 3 through 5 are difficult to answer for contaminants that are not point sourced or are caused by some specific act or occurrence. For chemicals such as hexavalent chromium, arsenic, uranium, etc. questions such as “does the APPLICANT have access to the PROJECT location?” or “has the responsible party been located?” are difficult to answer.
2. Question 7.1 incorrectly lists hexavalent chromium in solely the man-made chemical list. Hexavalent chromium is almost exclusively a naturally occurring chemical in water systems throughout California. Very few instances of hexavalent chromium are a result of man-made activities. The check-off box for hexavalent chromium should be found in the naturally occurring chemicals column as well.

Proposition 1 GWS comments:

1. What types of projects should be eligible or given higher priority?

Answer: Projects that protect the public from exposure to contaminants that are on the list of enforceable Maximum Contaminant Level (MCL) chemicals listed in the water code should get first priority. Programs that do not have a responsible party to address responsibility should also get priority.

2. Should some funds be used for loans? If so, how much?

Answer: Section 79774 (b) states that a cost share of not less than 50% of the total costs of the project shall be required. I suggest that rather than carve out a specific dollar amount for loans and grants, that half of an applicants request be in the form of a grant and half in the form of an SRF or other loan. Special grant provisions for DACs to receive higher grant/loan ratios should be provided.

3. How much funding should be set aside for technical assistance to disadvantaged communities? What kind of technical assistance is needed?

Answer: Section 79774 (d) states that at least 10% of the funds available be allocated for projects serving DACs. I would suggest that an additional 2% of the funds available (20% of the funds for each DAC project) be allocated for technical assistance and planning for DAC projects.



4. What kind of limits should there be on grant funding amounts?

Answer: Although no grant funding limits are listed in the law, perhaps a grant cap might be appropriate in order to at least begin work on as many projects as possible. I would suggest a cap in the \$10 to \$15 million range with a provision that larger justifiable requests can be made to SWRCB. Section 79774 (b) makes clear that local cost sharing is required with the exception of DACs.

5. What factors should we consider in determining cost share? How should leveraging of private, federal, and local funds be considered in project s selection?

Answer: Projects that bring significant (over 50%) private, federal and/or local funds to the project should be given priority to get the project completed. Section 79774 (b), however should be enforced.

6. What kind of project benefits should we look for or focus on?

Answer: The following should receive equal attention for prioritization:

- *Threat posed by groundwater contamination to drinking water supply*
- *Potential for groundwater contamination to spread/impair*
- *Potential of project to enhance local water supply reliability*
- *Potential of project to recharge vulnerable, high-use basins*
- *Projects with no viable responsible party(ies) or responsible parties unwilling/unable to pay total cleanup cost*

7. How should the timing of project completion and timeline for project benefits to be realized be considered in project selection?

Answer: I believe any decisions about the benefits and timing for those benefits to be realized should be made by the SWRCB Project Managers. No set timing should be made. The decisions are very much project dependent.

8. How should we assess a community's ability to pay for operations and maintenance of a facility funded by Proposition 1 funds?

Answer: All applicants should fill out the Technical Managerial and Financial (TMF) capacity forms in the FFAST application packet.

9. What would constitute a reasonable effort to identify responsible parties and recover costs by parties receiving funding?

Answer: Applicants must provide full documentation of their efforts to identify responsible parties. SWRCB Project Managers should review and comment on such efforts before proceeding further.



10. How should responsible parties' unwillingness or inability to pay for the total cost of cleanup be evaluated?

Answer: Applicants must provide full documentation of their efforts to identify responsible parties. SWRCB Project Managers should review and comment on such efforts before proceeding further.

11. When considering a potential project funded under this program should any of the contaminants listed in Proposition 1 or other contaminants not listed, be given higher priority?

Answer: Projects that protect the public from exposure to contaminants that are on the list of enforceable Maximum Contaminant Level (MCL) chemicals listed in the water code should get first priority.

12. What areas of the Groundwater Sustainability section of Proposition should be further defined or clarified in the guidelines?

Answer: The guidelines should reflect that naturally occurring contaminants that cannot be removed from the aquifers should be removed at the wellhead so as to prevent contamination to the drinking water supply and to enhance local water supply reliability.

Thank you for taking these comments under consideration.

Sincerely,

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