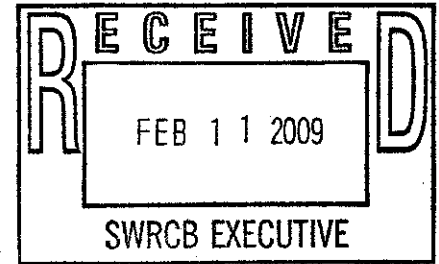


## CALIFORNIA TAHOE CONSERVANCY

1061 Third Street  
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(530) 542-5580

February 11, 2009

Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board

The California Tahoe Conservancy appreciates the opportunity to provide additional comments on the Draft Final Guidelines for the Proposition 84 Storm Water Grant Program which are being considered for approval at the State Board's February 17, 2009 meeting. We have two primary concerns that we request the Board to consider:

1. We request that the Board award preference points to projects which are eligible under the LID criteria or other non-TMDL criteria for complying with TMDLs that are not yet established or are in areas that address waters of Outstanding National Resource status. This will reward agencies which are being proactive in trying to meet not only future TMDL requirements that are not yet officially "established" or other national water goals, but also for incorporating LID or other strategies, adopted by the State Water Board, in their projects.
2. We request that the Board reconsider allowing the use of grant funds for matching funds. Section 1(e) of Assembly Bill 739 states that the Board and DWR "... should coordinate applicable financial assistance programs to maximize public benefits and leverage local and federal funding." While the Guidelines allow the use of State Revolving Funds, which is one source of financial assistance programs, for match, they specifically exclude the use of grant funds. Grant funds are an important financial assistance program for many communities and agencies throughout the State that serves to maximize the ability to leverage federal and local funding. To specifically exclude their use for matching funds appears to be in direct conflict with the intent of the language of Assembly Bill 739. We would also like to point out that if the current language is kept and grant funds are not allowed to be used for match, it is our opinion that fewer projects with multiple funding sources will be implemented. Again, this appears to conflict with the intent of Assembly Bill 739 and current statewide grant program strategies.

Thank you for the opportunity to provide these additional comments for your consideration. If you should have any questions, I can be reached at (530) 543-6013.

Penny Stewart  
Erosion Control Program Manager  
California Tahoe Conservancy