EQC Meeting, August 21, 2009 Newport Oregon

Comment submitted during EQC Public Forum on proposed permanent CWSRF ARRA rulemaking.

Commenter: Milo Meacham representing the City of Cobury

DEQ’s proposed permanent rules frustrate the intent of Congress and the American Recovery and Reinvestment Act of 2009 (ARRA) by conservatively interpreting how ARRA funds can be spent. ARRA restrictions indicate funds cannot be used to refinance or restructure loans existing before October 1, 2008. ARRA does not restrict providing supplemental ARRA funded loans to communities with existing Clean Water State Revolving Fund loans.

Congress’ intent in establishing ARRA was to fund projects that are ready to proceed and provide the best opportunity to stimulate the local economy. DEQ is proposing that funding be limited to new projects only. Existing projects, evidently because they have arranged for potential funding and completed preliminary ground work, will not be eligible for ARRA funding under the DEQ rule. Not funding existing projects will result in a lost opportunity to stimulate the economy.

DEQ should follow regulations intended by Congress and the Environmental Protection Agency and not propose additional restrictions on ARRA funds.