



A Nonprofit Housing and Community Development Organization

May 25, 2019

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
via email to: commentletters@waterboards.ca.gov



RE: Comment Letter – June 18, 2019 Board Meeting – SFY 2019-20 (FFY 2019) CWSRF IUP

Dear Clerk and Members of the Board:

Thank you for the opportunity to comment on the Draft 2019/20 CWSRF IUP. Since 1974, Self-Help Enterprises (SHE) has been assisting small, rural low-income communities to evaluate their infrastructure needs and options and access and implement funding to improve over two hundred drinking water and wastewater projects serving over two hundred and twenty communities.

In recent years, increased funding of water and wastewater programs and technical assistance by the State Water Resources Control Board (SWRCB) is helping many communities. Suitable and affordable infrastructure is critical to improving the quality of life for disadvantaged and severely disadvantaged rural communities. The Draft 2019/20 CWSRF IUP is evidence of the State's continued commitment to provide essential and affordable infrastructure to low-income communities in the State.

Comments referring to:

Green Project Reserve: (page 13, Draft CWSRF/Prop 1 IUP)

We recognize the limited funds in the GPR, however we recommend the Board continue to accept additional GPR projects serving DAC and SDAC communities. In addition, we recommend 100% grant or PF funded green infrastructure to help lower operational costs for eligible disadvantaged and severely disadvantaged projects serving communities with high unemployment and/or elderly residents.

SDAC and DAC Reduction: (page 14, Draft CWSRF/Prop 1 IUP)

We support reduced interest rates for SDACs and DACs.

Small Community Grant Fund: (pages 17 & 18, Draft CWSRF/Prop 1 IUP)

Self-Help Enterprises commends the Board for prioritizing both funding and technical assistance to assist SDACs and DACs with resolving their wastewater and water problems. Small communities lack the resources to build projects, and they are also challenged to navigate funding programs. Technical Assistance helps them get there.

Groundwater Grant Program: (page 20, Draft CWSRF/Prop 1 IUP)

We support the use of Prop 1 Groundwater grants for SDAC and DAC septic to sewer projects. Self-Help Enterprises works with several communities with failing septic systems and frequent use of seepage pits for wastewater disposal that have documented groundwater contamination. Use of these funds can prevent additional groundwater contamination and help supplement current CWSRF funds.

Fundable List Placement (page 25, Draft CWSRF/Prop 1 IUP)

We agree with automatic placement of SDAC and DAC projects in the Fundable List.

Efficient Service, Up-To-Date Policies and Procedures, and Recognizable Products: (page 40, Draft CWSRF/Prop 1 IUP)

We applaud the SWRCB's efforts to integrate multiple funding sources, prioritize SDACs and DACs, and efforts to meet Clean Water requirements and goals throughout the State.

Appendix F: (page 70, Draft CWSRF/Prop 1 IUP)

We thank the Board for continuing to maintain the funding offered to severely disadvantaged and disadvantaged communities under the previous Intended Use Plans. We recommend the maximum grant cost per household per project be increased to \$40,000 to match the increase in project costs over the last few years. We support the flexibility given to the Board to fund small DACs projects with wastewater rates greater than 1.5% of MHI with 100% grant funding (Appendix F, footnote 58).

Appendix G: (page 71, Draft CWSRF/Prop 1 IUP) Septic to sewer and regional project grant funding

We agree with the States funding guidelines as described in this Appendix and footnotes. We especially support the higher per-household funding limit, since these types of projects can be more expensive and also require the abandonment of old septic systems, a significant expense.

Septic system abandonment and connection to sewer system: (Not listed in the IUP)

We encourage grant funding of onsite septic system abandonment and connection to sewer systems for disadvantaged and severely disadvantaged communities involved in a septic to sewer project. Residents of low-income communities need help covering this on-site work that can be a significant final barrier to fixing a family's septic system problems, resolving public health hazards and groundwater contamination.

Appendix H: (page 72, Draft CWSRF/Prop 1 IUP)

The 100% grant funding for feasibility studies and planning projects that benefit disadvantaged and severely disadvantaged communities is an important step to help small communities solve their infrastructure needs. We support the allowance for additional Planning grant for a regional planning projects affecting multiple communities.

Use of State funds to reduce SDAC and DAC Project and operation and maintenance costs

As a technical assistance provider, SHE is dedicated to empowering communities to make informed decisions about their infrastructure. Community members use monthly and annual costs to measure their ability to pay. Single person and elderly households are particularly

impacted by rates even at 1.5% of a Community MHI due to their very restricted incomes. We recommend disadvantaged and severely disadvantaged communities be able to use State funds for infrastructure to lower their project loan debt burden as well as operation and maintenance costs.

Appendix D: Principal Forgiveness Eligibility Criteria: (page 69, Draft CWSRF/Prop 1 IUP)

We support the availability of Principal Forgiveness (PF) for water or energy conservation audits or assessments. This will be helpful for small communities whose tight budgets do not usually allow for such audits.

Emergency grant funding recommendation:

The SWRCB Drinking Water program has successfully had an emergency grant program to help small low-income community water systems. Old and small community wastewater systems serving disadvantaged and severely disadvantaged communities need to have access to Emergency grant funding. Recently the low-income community of East Orosi was faced with failure of their community lift station, draining limited financial resources and causing sewage to back up in homes. Small low-income communities need emergency funds to prevent a public health hazard and community displacement. We recommend an Emergency Wastewater Grant fund be set up for emergency and critical wastewater system repairs requiring immediate help and/or to avert a public health pollution hazard. To this end, we have submitted a similar request to the Assembly Committee on Budget for inclusion in the upcoming state budget.

IUP Format recommendation: List of Eligible/Ineligible Project Costs

We recognize there are multiple funding resources covered within the CW IUP. To provide a clear outline of potential Project funding for applicants; we recommend the SWRCB provide a list of SRF and other funding eligible and ineligible project costs.

We thank the State Board and staff for their thoughtful use of funds and their continued commitment to helping California's least resourced residents obtain high-quality wastewater infrastructure, preserving our water resources for future generations.

Thank you again for the opportunity to comment. If you have any questions, please feel free to contact Paul Boyer of our Community Development Department at (559)-802-1681 or David Warner at (559) 731-9796.

Sincerely,



Thomas J. Collishaw
President/CEO