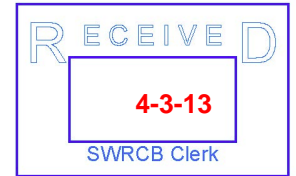


Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814



Re: "Amendment to the Policy for Implementing the CWSRF"

Dear Ms. Jeanine Townsend,

I respectfully request that the Division and the State Water Board make changes to eligibility requirements for Small Community Wastewater Grants. The City of Big Bear Lake is a Disadvantaged Community (DAC) because our median income is less than 80% of the State median income. We are rural bedroom community with no heavy industrial, high-tech, professional, or big box employment which limits employment opportunities and revenue generation.

Just a few years ago our small economically disadvantaged community was eligible to compete for grants (requiring matching funds) and principal forgiveness (no matching funds). Recently the eligibility requirements were modified so that we were no longer eligible for grants or principal forgiveness. In particular grants and principal forgiveness was no longer available to small economically disadvantaged community if its sewer rate was less than 1.5% of the median income or if the community occupancy is not greater than 50% using 2010 Census data. Our city sewer rate is 1% of the median income. If we raise the sewer rate to 1.5% of the median income it will severely impact the segment of the population the least able to afford it. It does not make sense that Division and the State Water Board would want the city to raise rates to qualify for a grant or principal forgiveness when the median income is below 80% of the State median income level.

The Division and the State Water Board use 2010 Census data to establish community occupancy. Unfortunately, the Census data is only a snapshot and does not properly characterize our community occupancy. Census data shows we have a population of 5,019 with 10,680 sewer connections (assuming 2.4 occupants per residence = 19.6% occupancy). Based on utilities usage (solid waste, wastewater, vacancy rates, etc), we can extrapolate that we have an average daily population of approximately 15,000 or 58.5% occupancy.

Therefore, we respectfully request the Division and State Water Board relax the overly restrictive eligibility rules for grants and principal forgiveness particularly for communities that qualify as small economically disadvantaged; and

1. Remove sewer rate criteria for small economically disadvantaged communities applying for grants and principal forgiveness
2. Remove the 50% occupancy criteria for small economically disadvantaged communities applying for grants and principal forgiveness

Due to the dissolution of the Redevelopment Agency, escalating NPDES and TMDL requirements, rural remoteness, limited employment opportunities, our community is challenged to find funding for \$8.4M+ wastewater projects which include:

- Sewer collection generator replacement project (emergency back-up generators violate AQMD standards)
- Phase 1 Sewer collection network I&I repairs to protect groundwater supplies

- Phase 2 Sewer collection network smoke testing
- Rehabilitation of Sewer Lift Station #3
- Design 2.5 miles of new sewer force main
- Construction of 2.5 miles of new sewer force main
- Update sewer and stormwater drainage mapping

Thank you for your serious consideration.

Our community looks forward to once again being eligible to compete for Small Community Wastewater Grants.

Sincerely,

Joe

Joseph A. Cylwik, P.E.
City of Big Bear Lake
Engineering Division
909-866-5831 x127