

Exhibit C
Summary of Proposed Clean Water State Revolving Fund (CWSRF) Policy Amendments and
Statement of Reasons

Note: Page references shown are for Exhibit A.

| Item | Page | Section/ Category | Description of Change(s) | Reason |
|-------------|-------------|---------------------------|---|---|
| 1 | iv | Executive Summary | Deleted in entirety | Text largely repeats information in the Introduction. Deleted the Executive Summary for clarity |
| 2 | 1 | I. Introduction | General text changes (insertions and deletions) | Updated effective date and various text changes (additions/deletions) to generalize the text. |
| 3 | 1 | II. Purpose and Objective | Deleted enumerated list of eligible projects for financing. | Deletion of this list generalizes this section. |
| 4 | Various | III. Definitions | Change list alphabetization from lower case to upper case | Consistency with current level section heading scheme |
| 5 | 2 | III. Definitions | Added text to paragraph (B) | Clarifies eligible applicants |
| 6 | 2 | III. Definitions | Added text for definition of “Effective date” (I) | New definition added for clarity and completeness |
| 7 | 2 | III. Definitions | Added text regarding Existing debt (N) | Text added for clarification |
| 8 | 3 | III. Definitions | Changed the maximum term in (P). | Clarify extending financing terms to the Division |
| 9 | 3 | III. Definitions | Added new definition for GAAP (Q) | Text added per new Water Resources Reform and Development Act of 2014 (WRRDA) requirements |
| 10 | 3 | III. Definitions | Text added to item (R) | Text added for clarification |
| 11 | 4 | III. Definitions | Deleted text (AB) | Text deletion clarifies the definition of a “Project”. |

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| 12 | 5 | III. Definitions | Amended text to the definition of "Treatment facilities" (AO) | Text amendment clarifies the definition and makes it consistent with the federal definition. |
| 13 | 6 | IV. Program Management | Added "Class" to project classification heading | Text added for clarification and consistency |
| 14 | 7 | IV. Program Management | Amended text to refer to project rankings | Text amended for clarification |
| 15 | 8 | IV. Program Management | Amended text regarding the interest rate. | Text amended to clarify interest rate calculation. |
| 16 | 9 | IV. Program Management | Added text regarding the management and submittal of the annual report to the USEPA. | Text added clarifies management of annual report. |
| 18 | 9,10 | V. Match Financing | Contextual edits | Edited for clarity and consistency |
| 19 | 10 | VI. Refinancing | Contextual edits | Edited for clarity and consistency |
| 20 | 10 | VI. Refinancing | Amended subsection text requiring Davis Bacon compliance requirements. | Text amended for clarity |
| 21 | 11 | VI. Refinancing | Added new subsection requiring compliance with American Iron and Steel requirements. | Added subsections in compliance with allowable changes under WRRDA |
| 22 | 11 | VII. Water Recycling and SDAC Projects | Add text describing how the Deputy Director may waive Federal CWSRF pass-through requirements. | Text clarifies Deputy Director role |
| 23 | 11 | VII. Water Recycling and SDAC Projects | Added text clarifying that the description of incentives may be found in the CWSRF IUP | Text added for clarification |

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| 24 | 14 | VIII. Planning/Design Financing | Moved text describing what debt documents must be submitted. | Text added to clarify what documents are needed. |
| 25 | 14 | VIII. Planning/Design Financing | Costs associated with administrative and legal services associated with land acquisition are now eligible for reimbursement | Added subsections to highlight allowable costs |
| 26 | 14 | VIII. Planning/Design Financing | Cost associated with water and/or energy | Added subsections in compliance with allowable changes under WRRDA |
| 27 | 15 | VIII. Planning/Design Financing | Text added to specify when the draw period commences | Text added to clarify draw period. |
| 28 | 18 | IX. Publicly Owned Treatment Works Financing | Title Change of subsection "b" | Title changed for clarity |
| 29 | 18, 19 | IX. Publicly Owned Treatment Works Financing | Added new sections describing the Fiscal Sustainability Plan, cost and effectiveness analysis. | Added subsections in compliance with changes under WRRDA |
| 30 | 20 | IX. Publicly Owned Treatment Works Financing | Deleted the effective date for implementation of Demand Management | Effective Date no longer relevant to policy |
| 31 | 22 | IX. Publicly Owned Treatment Works Financing | Text amended to clarify compliance with federal environmental regulations | Text change for clarification |
| 32 | 23 | IX. Publicly Owned Treatment Works Financing | Text added stating that the Division will employ appropriate credit criteria in evaluation of pledged revenues | Text added for clarification |
| 33 | 24 | IX. Publicly Owned Treatment Works Financing | New subsection added regarding what may be pledged for repayment. | Text added to clarify pledged sources. |
| 34 | 24 | IX. Publicly Owned Treatment Works Financing | Moved and modified subsection providing conditions for applicant to refund debt. | Text moved and modified |

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| 35 | 25 | IX. Publicly Owned Treatment Works Financing | Added new subsection requiring a closed lien pledge for assessment backed financing. | Text changes to clarify debt servicing requirements |
| 36 | 26 | IX. Publicly Owned Treatment Works Financing | Added new subsection requiring the Division's consent for special tax-based financing. | Text changes to clarify debt servicing requirements |
| 37 | 26 | IX. Publicly Owned Treatment Works Financing | New subsection added waiving the requirement for an ordinance if the applicant is an SDAC | Text added to clarify Small DAC PRF waiver when applying for principal forgiveness |
| 38 | 27 | IX. Publicly Owned Treatment Works Financing | Title change to Questionnaire and Reimbursement Resolution | Title change for clarity and consistency with current text. |
| 39 | 27 | IX. Publicly Owned Treatment Works Financing | Added text regarding the actual date for eligible construction costs. | Text amended for clarification |
| 40 | 26 | IX. Publicly Owned Treatment Works Financing | Deleted list of lands eligible for purchase and associated footnote deleted | List of lands no longer eligible. Text change in compliance with allowable changes under WRRDA |
| 41 | 28 | IX. Publicly Owned Treatment Works Financing | New subsection added describing what lands may be acquired, the number of appraisals, and lien holder requirements | Text change in compliance with allowable changes under WRRDA |
| 42 | 29 | IX. Publicly Owned Treatment Works Financing | Text amended to include the cost associated with the preparation of a fiscal sustainability plan as eligible. | Text change in compliance with allowable changes under WRRDA |
| 43 | 29 | IX. Publicly Owned Treatment Works Financing | New subsection added to include the cost associated with the preparation of a new or updated operations and maintenance manual as eligible | Text change for clarification |
| 44 | 30 | IX. Publicly Owned Treatment Works Financing | Deleted subsection regarding ineligible costs associated with land and easements | Text change in compliance with allowable changes under WRRDA |

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| 45 | 35 | XI Construction/Implementation Financing Agreement | Changed semiannual reporting requirement to annual | Text change to be consistent with federal requirements |
| 46 | 35, 36 | XI Construction/Implementation Financing Agreement | Added American Iron and Steel requirements | Text change in compliance with allowable changes under WRRDA |
| 47 | 35 | XI Construction/Implementation Financing Agreement | Deleted requirement for applicants to cover the cost of change orders until approved by the Division | Allows Division to approve and disburse change orders during construction |
| 48 | 38 | XI Construction/Implementation Financing Agreement | Added new subsection regarding disbursement of funds for construction costs. | Text clarifies disbursement of funds. |
| 49 | 40 | XV. Record Reporting Requirements | Added subsection requiring recipients to maintain project accounts according to GAAP | Text change in compliance with allowable changes under WRRDA |