



The Union Sanitary District would like to provide the following comments on the draft CWSRF Policy:

1. We agree with the SWRCB's proposed streamlining and organization of the application package. It is easier to understand and follow. The application instructions are structured more as a checklist for applicants; this is good.
2. In the Technical Application, if the applicant checks "No" to Question No. 1 under the Delta Plan, there should be "NA" boxes to check for Question Nos. 2 and 3. Checking "No" implies that the applicant did not fulfill the requirements. There are other examples of this elsewhere.
3. The SWRCB has a "CEQA Plus" requirement for the CEQA process. Does the revised Environmental Application reflect those CEQA Plus requirements? Please clarify.
4. Is a bond counsel required of all applicants? We have not used a bond counsel in previous applications. A clarification of when the bond counsel is necessary would be good.
5. The "soft costs" allowance tables are no longer used. Will there be limits put on what those "soft costs" can be or do we just put the actual amounts (if known) or our best estimate? Please clarify.
6. Will sole-sourced equipment be funded? Our staff occasionally sole source major pieces of equipment with our Board's approval. Please clarify.
7. The SWRCB needs to provide a schedule for the review of the application materials. We plan projects to be constructed during dry weather months so timely review and approval of the application is critical. We've had problems in the past with delaying our projects because the SRF applications were not approved. There needs to be some accountability on the SWRCB to provide timely reviews and approvals.
8. If the SWRCB re-prioritizes the projects in review, it needs to inform applicants of those projects that have been put on a lower priority and provide an explanation. It shouldn't be arbitrary.
9. Will the SWRCB provide more streamlined and updated contract requirements that we can include in the contractor's bid documents? This would help tremendously in the implementation of the various requirements and enforcement during bidding and construction phases of projects.
10. Please include some information on Single Audit, such as definition, triggers/requirements, etc. Providing timely draw reports (see attachment) every month or quarter would be helpful in our planning of hiring an accountant to conduct the audit. Informing us of the Single Audit requirement at the end of our fiscal year is very late for us. Here are a couple of concerns with the Single Audit:
  - a. A qualified Single Audit opinion becomes public information, and could adversely affect an agency's credit rating.
  - b. A Single Audit requires internal resources, and adds time and expense to an agency's already-established budget.

Thank you for the opportunity to comment on the draft CWSRF Policy.

Raymond Chau, P.E.  
Principal Engineer  
Union Sanitary District  
5072 Benson Road  
Union City, CA 94587  
*Office (510) 477-7606*  
[Raymond\\_chau@unionsanitary.com](mailto:Raymond_chau@unionsanitary.com)

