



May 22, 2017

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 20, 2017 Board Meeting
FFY 2017 CWSRF IUP**

Dear Ms. Townsend;

I appreciate the opportunity to comment on the proposed Federal Fiscal Year 2017 Clean Water State Revolving Fund (CWSRF) Intended Use Plan (IUP). My comments pertain to the limitation on the maximum cost per household per project for septic to sewer projects as detailed in Table 4.c of the IUP. This table states that the "Maximum Cost per Household/Project" is \$50,000. I would like to make a couple points about this monetary limitation:

- 1) The currently adopted IUP sets the maximum cost per household per project at \$60,000. Conversation with SWRCB staff has indicated that the \$50,000 value in the proposed IUP is an error, and that the cost per household per project was intended to remain at \$60,000. I would request that at a minimum this value remain at the current value of \$60,000 per household per project.
- 2) The majority of septic to sewer projects occur in small, rural communities, and the value of \$60,000 per household per project is insufficient to fund most septic to sewer projects in these communities. As land use densities in the communities increase and/or old septic systems fail with no area available for the installation of new septic systems, these communities need to make the transition to traditional sewer collection and treatment systems. This is the exact type of problem that the CWSRF fund was established to address. However, these small, often disadvantaged communities do not have the population base to support the construction of a new sewer collection system and wastewater treatment plant. The cost to construct a new collection system and treatment plant is largely the same whether it is servicing 30 houses or 100 houses. A \$5 million wastewater treatment plant servicing 100 homes meets the \$50,000 cut off, but communities with less homes are unable to meet this threshold. There are 306 Very Small Towns & Villages in California with population less than 1,000 according to city-data.com. The majority of these small towns are in the 30 to 40 household range. I urge you to consider a larger cap of \$100,000 per household per project to help address this issue and assist these small, rural, disadvantaged communities.

I appreciate your consideration of my comments on the Draft IUP.

Sincerely,

A handwritten signature in black ink that reads "Nathan Stevens".

Nathan Stevens, PE