



A Nonprofit Housing and Community Development Organization

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 Clerk and Members of the Board:

Thank you for the opportunity to comment on the 2017/18 CWSRF IUP. Since 1974, Self-Help Enterprises (SHE) has been helping small, rural low-income communities to evaluate their infrastructure needs and options and access funding to improve over one hundred and eighty drinking water and wastewater projects serving over two hundred 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. Well suited and affordable infrastructure is critical to improving the quality of life for disadvantaged and severely disadvantaged rural communities. The 2017/18 CWSRF IUP is evidence of the State's commitment to provide essential and affordable infrastructure to low-income communities in the State.

Comments referring to Tables 4a, 4b, and 4c: (Draft CWSRF/Prop 1 IUP pages 43 to 45)

We thank the Board for continuing to maintain the funding offered to severely disadvantaged and disadvantaged communities under the earlier 2016/17 Intended Use Plan. 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.

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.

State funding for septic system abandonment and connection to sewer

We recommend State grant funding for onsite septic system abandonment and connection to sewer system for disadvantaged and severely disadvantaged communities involved in a septic to sewer project. Residents of low-income communities need help covering from \$2,000 to \$4,000 for this on-site work and it can be the only remaining barrier to solving a family's septic system problems.

Per-connection limits described in Table 4c

Individual septic systems continue to have environmental impacts ranging from groundwater and stream contamination to disease from exposure to surfacing raw sewage. We therefore support the higher grant caps and higher per-connection limits described in Table 4c for septic-to-sewer projects and regional projects.

Comments referring to Table 4d:

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.

We recommend that 75-100% grant or PF funding be available to disadvantaged or severely disadvantaged communities to pursue green projects as described in Table 4d. 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.

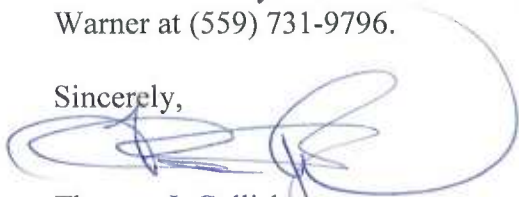
Emergency grant funding recommendation:

The 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. 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.

We thank the State Board and staff for their thoughtful use of funds and their continued commitment to helping California's poor residents obtain high-quality wastewater infrastructure, preserving our 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