



May 22, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



Via email to: [commentletters@waterboards.ca.gov](mailto: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 adoption of the Federal Fiscal Year 2017 Intended Use Plan for the Clean Water State Revolving Fund. My comment is related to the limitation on the Maximum Cost Per Household Per Project for Septic to Sewer Projects as detailed in *Table 4.c; SCG Construction Grant for Septic to Sewer and Regional Projects*. This table states that the "Maximum Cost Per Household/Project" is \$50,000. I would like to make a couple comments about this monetary limitation:

- 1) The currently adopted Intended Use Plan has that value at \$60,000 per Household/Project. It is my understanding from SWRCB staff that the \$50,000 value 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 to revised to the current value of \$60,000 Household/Project.
- 2) The value of \$60,000 Household/Project in and of itself is insufficient to fund most conversions from septic to sewer projects in small communities. Many of these types of projects occur in small rural communities that for decades have been able to operate using individual septic systems. As landuse densities in the communities increase, 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 exactly what this CWSRF fund was established to address. However, these small, often disadvantaged communities, do not have the population base to easily support the construction of a new sewer collection system and wastewater treatment plant, or they would have made the transition years ago. The cost to construct a wastewater treatment plant is largely the same, whether it is servicing 30 houses or 100 houses. A \$5M wastewater treatment plant servicing 100 homes meets the \$50,000 cut off, but for communities with 30, 40, or 99 households, they 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 and the opportunity to comment on the Draft Intended Use Plan.

Sincerely,

A handwritten signature in black ink, appearing to be "PK" with a stylized flourish.

Patrick Kaspari, P.E.

**GHD Inc.**

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