

**SFY 2010/2011 - Clean Water State Revolving Fund (CWSRF)  
Intended Use Plan (IUP) Public Comments  
June 24, 2010 to July 16, 2010**

Date Comment Rcvd.	Agency	Representative	Comments	Staff Recommendation
6/28/10	<a href="#">City of Paso Robles</a>	Matt Thompson Wastewater Manager	The Paso Robles WWTP upgrade will be ready to proceed to construction as early as March 1, 2011, and Matt Thompson, Wastewater Manager, for the City of Paso Robles would like to add the Paso Robles WWTP upgrade to the project list.	Division of Financial Assistance has received an application from the City, and a project manager is assigned to the project. The project was added to Table 2 of the IUP for planning purposes.
6/29/10	<a href="#">Placer County Public Works Department</a>	Peter Kraatz Deputy Director	Placer County's comments related to the five project applications submitted for consideration in the 10/11 IUP. Placer County recommends that the Brockway project be considered the first choice for SRF funding of all of five applications.	Staff acknowledges receipt of the comment. The IUP is a planning document that attempts to forecast which projects will be financed over the 2010/11 fiscal year. The IUP is not a commitment to fund projects, though, and Table 2 does not determine the order in which projects will be funded. Table 2 is only an estimate of when a project may be funded. In addition, projects are not required to be listed in the IUP to be funded. An eligible project is funded when it has a complete application that is reviewed and approved by Division of Financial Assistance staff.
7/7/10	<a href="#">Los Angeles Department of Water and Power</a>	Clayton Yoshida	On Table 4, page 31, of the IUP, what does "DAC" mean? The IUP has no description of this acronym.	The acronym for Disadvantaged Community (DAC) was added to the IUP index of acronyms.
7/7/10	N/A	Ezrah J. Chaaban	I received an email entitled "Announcement - 2010/11 CWSRF Intended Use Plan (IUP)" in connection with my inclusion on a Prop. 84 storm water grant program mailing list. As far as I can tell this is not connected to the Prop. 84 grant program. Is that correct? I am just making sure that I am not missing something.	The "Announcement - 2010/11 CWSRF Intended Use Plan (IUP)" was sent to a broad range of the funding related email lists administered by the State Water Resources Control Board (State Water Board). Although the announcement did not specifically relate to the Proposition 84 Storm Water Grant Program (SWGP), the Clean Water State Revolving Fund program is another potential funding source for storm water projects.  If you are interested in finding out more about the CWSRF Program and how it might help finance storm water projects, please visit the CWSRF Program webpage at: <a href="http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml">http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml</a> .
7/8/10	<a href="#">California Land Stewardship Institute</a>	Laurel Marcus Executive Director	I am writing to correct the listing of our project in Table 2 of SFY 2010/2011 IUP for the CWSRF Program. Table 2 lists project # 6429-110 by the California Land Stewardship Institute named the Northern California Wine Country Agricultural Water Quality Program. This project is located in Regional Board 1, not 4 as listed.	Table 2 of the draft SFY 2010/2011 IUP for the CWSRF Program was updated to reflect that this project is located in Region 1.
7/9/10	<a href="#">City of Modesto</a>	Will Wong Senior Civil Engineer	The City of Modesto application for Tertiary Treatment Phase 2 (Project # 5175-210) should be listed with an estimated cost of \$120,000,000, not \$32,000,000.	Table 2 of the draft SFY 2010/2011 IUP for the CWSRF Program was updated to reflect that the estimated project cost is \$120,000,000.

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7/15/10	<a href="#">Pacific Coast Fish. Wildlife &amp; Wetlands Restoration Association</a>	Mitch Farro Executive Director	<p>We are writing to express support for designating a reasonable portion of CWSRF funding for rural disadvantaged community expanded use projects.</p> <p>Additionally, because rural non-point source pollution projects were effectively excluded from competing for ARRA CWSRF funds last year, many could benefit from funding this year and further in the future. As stated in the Intended Use Plan, Congress and US EPA believe that subsidies should be given to projects in communities that could not otherwise afford the project.</p>	Thank you for your comment.
7/15/10	<a href="#">San Francisco Public Utilities Commission</a>	Ed Harrington General Manager	<p>We support the goal of financing infrastructure to benefit the health of California's environment and local communities.</p> <p>We support the new language of these guidelines (Pg. 30, Table 4, Category 2) that expands the eligible CWSRF criteria for grants to "Disadvantaged Communities" to include projects in "Disadvantaged Areas" in any jurisdiction of the state. The category of "Disadvantaged Area" is an important category that if applied as we interpret it, should create broader opportunities for funding projects in all areas of the state to specifically benefit disadvantaged households.</p>	Thank you for your comment.

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7/16/2010	<a href="#">East Palo Alto Sanitary District</a>	Richard J. Laureta, P.E. District Engineer	<p>We are concerned with the Board's definition of disadvantaged communities. Small, rural communities are given principal forgiveness/grants, whereas, urban areas, like the areas that the East Palo Alto Sanitary District serve, continue to struggle and are misrepresented.</p> <p>We have the following comments regarding the Project List for SFY 2010/11 listed below:</p> <p>1) Our agency name should be changed from City of East Palo Alto to East Palo Alto Sanitary District.</p> <p>2) The estimated dates of construction should be pushed back to first quarter 2011.</p> <p>3) With the strong hopes the Board finds the areas our Sanitary District serves to be disadvantaged, we would like to be considered for the 50-50 program. We believe 50 percent of the project costs for our projects should be principal forgiveness. Thus the Estimated Total Financing value in the table should be placed in the Principal Forgiveness column with no CWRSF loan financing needed.</p>	<p>Table 2 of the draft SFY 2010/2011 IUP for the CWSRF Program was updated to change the name of the applicant.</p> <p>Staff did not update the estimated construction dates. The IUP is a planning document that attempts to forecast which projects will be financed over the 2010/11 fiscal year. The IUP is not a commitment to fund projects, though, and Table 2 does not determine the order in which projects will be funded. Table 2 is only an estimate of when a project may be funded. An eligible project is funded when it has a complete application that is reviewed and approved by Division of Financial Assistance staff.</p> <p>The draft IUP proposes to make principal forgiveness available to disadvantaged communities in two categories. The second category allows for principal forgiveness for projects that serve a disadvantaged area of a larger community (see Table 4, Category 2.b). Although the City of East Palo Alto (City) itself does not qualify as a disadvantaged community because the City's Median Household Income [MHI] is more than 80 percent of the statewide MHI, portions of a project, or individual projects, serving disadvantaged areas (MHI less than 80 percent of the statewide MHI) could be eligible for principal forgiveness/grants. Portions of the project that serve a disadvantaged area may receive principal forgiveness/grants of 50 percent of the eligible project costs, not to exceed \$3 million in principal forgiveness/grants. Based on a staff's preliminary review of census data, approximately 25 to 30 percent of the City's population resides in disadvantaged census areas. A project, or projects, serving these disadvantaged portions of the City could be eligible for 50 percent principal forgiveness/grants. Final determinations regarding the eligibility for principal forgiveness/grants are made during review and approval of a financing application. Division of Financial Assistance staff will continue to work with the applicant to determine its eligibility for principal forgiveness/grants.</p>
7/16/2010	<a href="#">Pacific Watershed Associates Inc.</a>	William Weaver Principal and CEO	We support designating a significant portion of CWSRF funding for rural disadvantaged community expanded use projects.	Thank you for your comment.

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7/16/2010	<a href="#">The Los Angeles &amp; San Gabriel Rivers Watershed Council</a>	Nancy L. C. Steele, D.Env. Executive Director	<ol style="list-style-type: none"> <li>1) Principal forgiveness for non-point source expanded use program should be fully funded at the \$72 million dollar level as supported by the recommendations of EPA for disadvantaged communities.</li> <li>2) Non-profit organizations should continue to be able to receive funds through the CWSRF for expanded use and non-point source projects.</li> <li>3) Local contribution match for construction and implementation should not be limited to cost after October 1, 2009. We recommend that the Board allow all construction/implementation costs related to the project to count toward the local contribution regardless of date.</li> <li>4) For the Sun Valley Neighborhood Demonstration Retrofit Phase II, number 6406-110, all \$480,000 should be listed in the column Capitalization Funds Federal Year 2010 (Principal Forgiveness). This project could not be built if any of the funds were received as a loan without principal forgiveness.</li> </ol>	<ol style="list-style-type: none"> <li>1) Thank you for your comment.</li> <li>2) Non-profit organizations remain eligible for CWSRF funds for expanded use and non-point source projects.</li> <li>3) Staff recommends the date stay the same. These funds were appropriated by Congress as part of the Federal Fiscal Year 2010 Budget (October 1, 2009 - September 30, 2010), and can only be used for financing agreements executed after October 1, 2009. Since the funds were not available until October 1, 2009, staff recommended this as the most logical date for eligibility of construction or implementation costs toward the local contribution. Since planning and design can be lengthy, staff recommended that those costs be counted toward the local contribution consistent with its historic practice of reimbursing past planning and design costs.</li> <li>4) Staff continues to recommend that local agencies contribute to their projects to ensure successful completion of the projects.</li> </ol>