



Dear SWRCB Board members and staff:

Self-Help Enterprises commends the State Water Resources Control Board and Staff with their efforts to help Disadvantaged Communities (DAC) and Severely Disadvantaged Communities (SDAC).

Here are comments on some items in the "Third Annual Update on Efforts to Assist Small and/or Disadvantaged Communities in Meeting their Wastewater Needs".

Page 2, Item #2:

SHE supports the changes and asks the SWRCB to maintain funding and regulation flexibility for S/DAC as more S/DAC will be needing funds in the face of reduced Federal funding.

Page 2, Section 2. e. Exhibit A:

In future, suggest targeting and encouraging a higher percentage of Principal Forgiveness to small severely disadvantaged communities that are stand alone communities as opposed to a neighborhoods of a larger jurisdiction.

Page 3, Item #3:

As noted in the Report these funds are critical to S/DAC projects. We recommend the State provide an updated amount of the funds allocated to this account to be collected per AB2356 in these periods:

FY 2011-12

FY 2012-13;

FY 2013-14; and

July 1, 2014 to December 31, 2014

Page 4, Item #5:

Encourage retired operators to provide help to S/DAC

Page 4, Small Community Wastewater Improvement Workgroup

SHE requests to be added to this Workgroup.

Page 5, TA Contract

The State should also contract with regional TA providers. SHE has been excluded from much needed TA funding.

Page 6, Monitoring & Reporting

S/DAC monitoring should focus on effluent water quality. Monitoring already contaminated groundwater from old & replaced septic systems is wasteful and expensive. If required please reduce the WDP fees.

Page 7&8, Potential action 3a:

We strongly support planning loans with principal forgiveness to small severely disadvantaged communities. We also encourage use of Small community wastewater grants for planning work in these communities to cover predevelopment costs which are very difficult for these communities to cover on their own. This will allow such communities to get in line for later construction funding.

David A. Warner
Sr. Community Development Specialist
Self-Help Enterprises
P.O. Box 6520
Visalia, CA 93290
Tel: (559) 802-1682, Cell: (559) 731-9796
FAX: (559) 651-3634