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May 10, 2018

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**Subject: Comment Letter – June 19, 2018 Board Meeting –
FFY 2018 CWSRF IUP**

John L. Sears
Director

Dear Ms. Townsend,

Lisa Ohlund
General Manager

On behalf of the East Orange County Water District (EOCWD), I would like to thank the State Water Resources Control Board for their continued efforts to help regulate and manage drinking water and wastewater in the State through Intended Use Plans (IUP). The grants and loans that the Division of Financial Assistance (DFA) provides communities across the State helps secure clean, safe, and affordable drinking water as well as responsible and effective wastewater infrastructure.

EOCWD firmly believes that the Clean Water State Revolving Fund (CWSRF) is a necessary and beneficial tool for local agencies to leverage funding in order to build critical infrastructure in their communities. The IUP that is adopted every year by the State Water Resources Control Board does a great job at describing how the CWSRF will be utilized in the upcoming year to meet the wastewater goals of the State. Although the CWSRF is useful, we believe that additional emphasis should be given to projects that seek funding or financing for septic to sewer conversions.

EOCWD still has several hundred septic tanks in our retail water zone as a result of unusual land-use planning practices in our surrounding cities. Closing these septic tanks and converting residential wastewater systems to join the local sewer system is a costly expense for these homeowners which can run between \$35,000-\$100,000. Additionally, many septic systems statewide are failing and pose a grave public health risk. In some areas, failing septic systems contaminate local groundwater supplies, further exacerbating the clean, safe, and affordable drinking water problem for some communities; in fact, this is occurring within our service area.



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Some homeowners are willing to cover the costs of conversion but need a financing mechanism to help make the purchase more pliable. Many of the homeowners in our District who have failing or old septic systems are retired and on a fixed income, therefore the cost of connecting to the local sewer system is out of the question without additional financing tools

We would like to request that the IUP change the way the DFA handles CWSRF requests for septic to sewer financing projects. Currently, these types of projects are funneled through existing CWSRF channels and do not compete well with larger wastewater infrastructure projects. Solutions to this problem could include: dedicated funding for septic to sewer projects, modified application processes to make review and award of septic to sewer applications easier, or priority scoring points for septic to sewer projects during CWSRF application review.

Thank you for taking the time to consider our input for the need of septic to sewer changes in the 2018/2019 CWSRF IUP. If you have any questions, please do not hesitate to call my office at (714) 538-5815.

Sincerely,



Lisa Ohlund
General Manager

C: Eric O'Donnell, TPA