



October 19, 2018

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

Submitted via email to [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**Subject: Comment Letter – November 27, 2018 Board Meeting –  
CWSRF Policy Amendment**

Dear Ms. Townsend:

Thank you for the opportunity to review and provide comments on the Draft 2018 Policy for Implementing the CWSRF (CWSRF Policy) Program. The Sacramento Regional County Sanitation District (Regional San) provides wastewater collection and treatment services to 1.4 million residents, businesses, and industry in the greater Sacramento region and has applied for and received CWSRF financing in the past.

Regional San appreciates the efforts of the State Water Resources Control Board in developing a new process to prioritize the many projects that will receive CWSRF and Complementary funding each year.

In general, Regional San supports the comments submitted by the California Association of Sanitation Agencies (CASA). In addition, we are also providing the following three comments to help improve clarity. For those instances where we are proposing specific language changes, the original draft CWSRF Policy text is shown in black, while Regional San's additions are shown in blue-underline text, and deletions are shown in ~~red-strikeout~~.

**1. New Definition of “Eligible Start Date”.**

*““Eligible Start Date” means the date established by the Division upon approval of the financing application. Construction costs incurred after this date are eligible for financing. For project financing the eligible start date may not be earlier than a fundable project’s notice to proceed date or the start of project implementation.”*

Regional San strongly supports the intended CWSRF Policy change to allow reimbursement of construction costs starting with the notice to proceed date. However, as currently written, it appears that the proposed definition may be problematic for requesting reimbursement of planning and design costs due to the “Eligible Start Date” not being earlier than the notice to proceed date. We would recommend including clarifying language to this definition.

**2. Consider Adding a definition for “Fundable Year”.**

The CWSRF Policy refers to the “fundable year” in several places and it would be helpful to have a clear definition of the fundable year period.

As an example: [“Fundable Year” means the State Fiscal Year, which is between June 30 and July 1.](#)

**3. The following change to Section IV.B.1.b. is suggested for consistency with sub-section c.**

*“b. All projects<sup>1</sup> submitted to the Division for CWSRF and its complementary funding sources will be evaluated for placement on the Fundable List. Annually all applications, with the exception of small SDAC, small DAC, and public health<sup>2</sup> projects, will receive a priority score as described below in Section IV.B.2 of this Policy.”*

*“c. Small SDAC, small DAC, and public health projects are Fundable at any time provided they meet all eligibility requirements, and will automatically be added and remain on the Fundable List until:”.*

We appreciate the opportunity to provide comments on the proposed CWSRF Policy amendments. If you have questions or comments regarding the items above, please contact me at (916) 876-6092 or [MitchellT@sacsewer.com](mailto:MitchellT@sacsewer.com) or Nanette Bailey at (916) 876-4003 or [BaileyN@sacsewer.com](mailto:BaileyN@sacsewer.com).

Sincerely,



Terrie Mitchell  
Manager, Legislative and Regulatory Affairs

cc: Heidi Oriol, Senior Civil Engineer  
Nanette Bailey, Associate Civil Engineer