



Technology in balance with nature

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October 23, 2012

Jeanine Townsend, Clerk to the Board
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Submitted via email: commentletters@waterboards.ca.gov

**SUBJECT: Comment Letter – November 20, 2012 Board Meeting –
2013 IUP (SRCSD/SASD)**

Dear Ms. Townsend:

The Sacramento Regional County Sanitation District (SRCSD) and the Sacramento Area Sewer District (SASD) appreciate the opportunity to provide comments on the Federal Fiscal Year (FFY) 2013 Intended Use Plan (IUP). SRCSD provides wastewater conveyance and treatment for over 1.4 million residents throughout the greater Sacramento region. SASD provides wastewater collection services to 1.2 million residents throughout the greater Sacramento area. Both SRCSD and SASD have upcoming projects that could potentially be funded through the Clean Water State Revolving Fund (CWSRF) Program.

The following comments are provided related to the 2013 IUP. Deleted text is shown in **red strikeout** and added text is shown in blue underline.

**Comment #1: Section III. Program Capabilities, C. Overall Funding
Approach, Item 4. Davis-Bacon Requirements, page 11**

The current text states:

“The 2013 federal appropriation will likely include a requirement that Davis-Bacon rules be applied. The State Water Board, therefore, will require that applicants comply with Davis- Bacon. Recipients of CWSRF financing must agree to provide information necessary to show compliance with Davis-Bacon requirements.”

The Davis-Bacon requirement adds additional financial costs and administration burdens to construction projects. A rewording of this text is

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Ms. Jeanine Townsend

October 23, 2012

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recommended as follows to allow a provision in the IUP and any SRF agreements that would allow for the elimination of the Davis-Bacon requirement if it is not a requirement of the federal appropriations process.

“The 2013 federal appropriation ~~will likely~~ may include a requirement that Davis-Bacon rules be applied. The State Water Board, ~~therefore,~~ will require that ~~applicants~~ financing agreements reflect requirements ~~comply with Davis-Bacon~~ of the current federal appropriations process. Recipients of CWSRF financing must agree to provide information necessary to show compliance with Davis-Bacon requirements if required.”

Comment #2: Section D. General Elements Applicable to CWSRF Funding, Item 2. Programmatic Assurances, page 13 states;

“On May 15, 2012, U.S. EPA approved the State Water Board’s request to offer extended term financing to projects that regionalize existing wastewater facilities. The State Water Board will begin offering extended term financing for regionalization during 2013.”

SRCSD and SASD appreciate the efforts of the State Water Board in seeking approval from U.S. EPA to offer extended term financing to regionalized projects. We encourage the use of financing terms that incentivize the use of the CWSRF funding program for improvements to wastewater treatment and collection facilities.

If you have questions or comments regarding the items above, please feel free to contact me at (916) 876-6092 or MitchellT@sacsewer.com or Lysa Voight at (916) 876-6038 or VoightL@sacsewer.com.

Sincerely,



Terrie Mitchell
Manager, Legislative and Regulatory Affairs

cc: Stan Dean, District Engineer
Prabhakar Somavarapu, Director of Policy and Planning
Ruben Robles, SRCSD Director of Operations
Christoph Dobson, SASD Director of Operations
Joe Maestretti, Chief Financial Officer
Lysa Voight, Senior Civil Engineer