A Public Agency

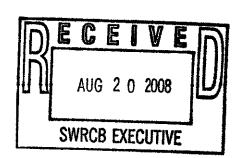


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August 13, 2008

Ms. Jeanine Townsend, Clerk to the Board State Water Resources Control Board 1001 "I" Street, 24<sup>th</sup> Floor Sacramento, CA 95814



Re: Amendment to the Policy for Implementing the CWSRF

The Amador Water Agency appreciates the opportunity to comment on the Proposed Amendment to the Policy for Implementing Clean Water State Revolving Fund (CWSRF) for the Construction of Wastewater Treatment Facilities. The Agency has the following comments:

The definition for "Disadvantaged Community includes" (a) community sewer rate of more than four percent (4%) of the community's MHI. That means in most cases, a sewer bill for customers of almost \$100.00 per month. The Agency recommends changing the definition to 2% to make it more affordable for customers.

The term of the repayment period is 20 years. The Agency requests extending that repayment period up to 30 years for "disadvantaged communities".

The Agency supports the refinancing of debt for "disadvantaged communities".

Finally, the adoption of this policy is a good first step in implementing CWSRF for the construction of wastewater facilities. The Agency has several small "disadvantaged community" systems that need financial support to meet the Clean Water Standards. The engineering solutions have been identified, and in some cases, completed. To implement the construction of these improvements the Agency recommends that the State implement a Wastewater Bond to generate the needed funds to be allocated to small communities to make needed improvements.

Thank you for the opportunity to comment on this policy.

Jirn Abercrombie

General Manager, Amador Water Agency

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**AWA Board of Directors** Kathy Mannion, RCRC Senator Dave Cox Assemblyman Alan Nakanishi