



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

Dear Board Members,

I respectfully request that the Board consider changes to eligibility requirements for Small Community Wastewater Grants. The City of Big Bear Lake is a Severely Disadvantaged Community (DAC) because our median income is less than 60% of the State median income. We are rural bedroom community with no heavy industrial, high-tech, professional, or big box employment which limits employment opportunities and revenue generation. The majority of employment opportunities are related to food service, vacation rentals, summer lake activities, and winter sports activities.

Just a few years ago our small economically disadvantaged community was eligible to compete for grants (requiring matching funds) and principal forgiveness (no matching funds). We successfully completed two (2) sanitation projects with the help of the CWSRF in 2010. The eligibility requirements were subsequently changed and we were no longer eligible for grants or principal forgiveness. In particular, grants and principal forgiveness were no longer available to the community if its sewer rate was less than 1.5% of the median income or if the community occupancy is not greater than 50% using 2010 Census data.

Our city sewer rate is 1% of the median income. If we raise the sewer rate to 1.5% or 2.0% of the median income it will severely impact the segment of the population that is the least able to afford it. It does not make sense that we should raise rates to qualify for a grant when the median income is below 60% of the State median income level. Please consider allowing economically disadvantaged communities with sewer rates less than 1.5% to complete for grants but require 50% local funding participation. Local funding participation will allow the community leaders to fund needed sewer projects from General Funds or Hotel Taxes or other business sources without putting extra burden on the low income families by raising sewer rates.

Grant applications use 2010 Census data to establish community occupancy. Unfortunately, the Census data is only a snap shot and does not properly characterize our community occupancy. Also, the Census data did not capture our large winter migrant worker community. Census data claims we have a population of 5,019 with 10,680 sewer connections (assuming 2.4 occupants per residences = 19.6% occupancy). However, based on utilities usage (solid waste, wastewater, water, etc) and vacancy rates we can extrapolate that we have an average daily population of approximately 15,000 or 58.5% occupancy. Please consider allowing economically disadvantaged communities the option of using verifiable community utility usage data as an alternative to US Census data for determining community occupancy.

Due to the dissolution of the Redevelopment Agency, escalating NPDES and TMDL requirements, rural remoteness, and limited employment opportunities, our community is challenged to find funding for \$8.4M+ wastewater projects which include:

- Sewer collection generator replacement project (existing emergency back-up generators violate AQMD standards)
- Phase 1 Sewer collection network I&I repairs to protect groundwater supplies
- Phase 2 Sewer collection network smoke testing
- Rehabilitation of Sewer Lift Station #3
- Design 2.5 miles of new sewer force main
- Construction of 2.5 miles of new sewer force main
- Update sewer and stormwater drainage mapping

Thank you for your serious consideration.

Our community looks forward to once again being eligible to compete for Small Community Wastewater Grants.

Sincerely,

Joe

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