



You state:

DEFINITIONS

(b) "Applicant" means, for the purpose of a publicly owned treatment works project, a city, town, district, state agency, or other public body (including an intermunicipal agency of two or more of the foregoing entities) created under state law, having jurisdiction over disposal of sewage, industrial wastes or other waste, an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the federal CWA applying for CWSRF funding. For the purpose of an expanded use project, "applicant" includes the foregoing, as well as a 501 (c)(3) nonprofit organization.

Comments:

We disagree with the inclusion of a 501 (c)(3) non-profit organization in this description. All other bodies listed have a form of representation for Due Process. There is no requirement that a 501(C)(3) have meetings and processes open to the Public.

This is especially critical in Disadvantaged Communities. Citizens' voices are even more suppressed as they have no Vote to have non-profit organizations represent them.

Mission Statements do not always encompass the needs of its Citizens as a Public Benefit Corporation. There is little oversight as to the execution of missions.

Open Public Meetings are not required. We cannot petition a non-profit organization. They do not always issue Audited Financial Statements with GAAP Principles.

Indian Tribes are separate Nations if Federally recognized as a tribe. Other tribes may be non-profit membership organizations under State corporation law. We disagree than ANY non-profit organization be included even if titled as "Indian". In California, there are tribes who are not Federally recognized and operate under State corporation law.

Do you mean to include Joint Powers Authorities.

You state:

DEFINITIONS

(ak) "Storm water Project" means any program, device, method, or system used to prevent, abate, reduce, transport, separate, store, treat, recycle, or dispose of pollutants arising or flowing in storm drainage that is transported in pipes, culverts, tunnels, ditches, wells, channels, conduits, from urban or rural areas to surface or groundwaters

of the state and the reuse or disposal of storm water determined acceptable for reuse or disposal.

Comments:

This definition does not define “determined acceptable for reuse or disposal” or the agency qualified to make such a determination.

Where does the agencies whose jurisdiction over Public Health fit into this definition.

You state:

IV. PROGRAM MANAGEMENT

A. Project List

3. Sustainability

A project that supports or incorporates one or more of the following sustainability goals receives one priority point for each area addressed:

- a. The project supports infill development or results in the reuse or redevelopment of land in an area presently served by transit, streets, water, sewer, and other essential services.*
- b. The applicant maintains a capital improvement plan, an asset management plan, or has performed a full-cost pricing analysis.*
- c. The project protects environmental or agricultural resources such as farm, range and forest lands; wetlands and wildlife habitats; recreational lands such as parks, trails, and greenbelts; or landscapes with locally unique features or areas identified by the state as deserving special protection.*
- d. The project is cited in one or more regional environmental management plans.*
- e. The project incorporates wastewater or storm water/urban runoff recycling, water conservation, energy conservation, low impact development, or reduced use of other vital resources*
- f. The project uses low-impact treatment for lower lifecycle operating costs through reduced energy, chemical, or other inputs.*

Comments:

There are no requirements for Operations and Maintenance as a form of Sustainability.

There is no definition of “regional environmental management plans.”

There is no reference as to the Geology and Soils as a viable resource for this section, if qualified. Not all Geology and Soils warrant a beneficial use for sustainability.

General Comments:

Conflict of Interest Codes are not addressed.

Are you addressed Gray Water or Rainwater Harvesting in this document. The State definition from other agencies does not include Storm Water.

You have not addressed non-adjudicated groundwaters.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA. 90031